

Number: WG18072



Llywodraeth Cymru
Welsh Government

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Consultation responses

Vibrant & Viable Places

New Regeneration Framework

Vibrant and Viable Places – A New Regeneration Framework Consultation Responses

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59. Jane Hutt AM
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69. Industrial Communities Alliance Wales
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144. Planning Aid Wales

1. Welsh Sports Association

Response to consultation

Vibrant & Viable Places – New Regeneration Framework

The potential contribution of sport, outdoor pursuits and physical recreation to regeneration of communities

Sport (by which term throughout this paper we mean to include outdoor pursuits and physical recreation generally) is a vital component in helping to establish:

Healthier Communities, (National Outcome 4 - 3 - (iii) - (p12)

The impact that sport can have on both physical and mental health is well established through research. Obesity in both adults and children has become of greater and greater concern – particularly in disadvantaged communities. Sports encourage feelings of well-being and positive character-building in young people. They develop individual responsibility, team working, powers of concentration and social skills. Anti-social behaviour is rare amongst those involved regularly in sport. In addition sport provides an environment in which diversity and equality can flourish.

Prosperous Communities, (National Outcome 4 - 3 - (i) - (p12)

It has been estimated that sport, physical recreation and outdoor pursuits contribute nearly three quarters of a billion pounds to the Welsh economy, providing many thousands of jobs. Furthermore a healthier population will self-evidently mean less financial pressure on health service budgets. The profile of Wales as an excellent destination for inward investment is enhanced by sporting success and/or the hosting of major events. The soft skills acquired by young people through sport - such as self-discipline, focus and the like - make them more attractive to employers. Sport also provides an opportunity for adults to learn new skills through coaching or volunteering in sport, that can then be used in future employment in the community.

Learning Communities (National Outcome 4 - 3 - (ii) - (p12)

Sport has helped some children and young people who have become disengaged from school to return and begin to reintegrate into school. Providing new skills and inspiring children and young people, sport can be a powerful vehicle to improve educational attainment and skill levels.

Bearing in mind the above we suggest that the following topics need to be considered when considering a comprehensive regeneration strategy

Local Authority Duty

Currently Local Authorities have no legal obligation to provide sport/leisure services. Consideration should be given to legislation to provide that they have a legal obligation to so provide. This is not with a view to seeking more money – it is well accepted that Local Authorities will have less resource going forward- but it would at least compel them to consider this area properly - and not merely to cut it simply because it is the easiest target. We agree that partnerships are vital. Should Local Authorities cut their sport & leisure departments then the opportunities for public/voluntary sector partnerships which often produce excellent outcomes will be diminished

Inculcating the habit of sport at school

There needs to be significant progress in regard to schools sports provision and voluntary sector links so as to create a habit of sport - particularly at primary school level - and to open greater community access to school facilities. This is critical in

disadvantaged areas where sometimes parental support is weak and facility use is prohibitively expensive

Volunteering

Coaches inspire and recruit as well as providing coaching itself. As state resource diminishes It is clear that going forward there needs to be greater numbers of voluntary community-based coaches. There should be ready access to support for voluntary coach recruitment training and up-skilling especially in disadvantaged areas. Generally every effort must be made to support and encourage local volunteering

Leverage via the private sector

There should be a detailed examination of practical ways to leverage private sector partnerships and support for sports in communities. Simple and inexpensive ideas such as creating an information hub where local needs can be matched to potential donors/partners can be examined. Procurement processes could be encouraged to give even greater weighting to community benefits of this kind

Removing barriers

It is vital that legislation does not create barriers to voluntary opportunities. By way of example we have some concerns in this regard relating to the proposed application of the Welsh Language Standards on the ability of small organisations to access support

The Welsh Sports Association

The Welsh Sports Association (WSA) is the recognised independent voice for sport, physical recreation and outdoor pursuits in Wales Since its foundation in 1972 the WSA has been the 'umbrella' organisation for National Governing Bodies (NGBs) of sport in Wales, providing them with representation and support. Currently over 60 NGBs are members of the WSA with an estimated 500,000 plus individual members under their banner. As well as being the voice for the sector the WSA offers a wide range of services to its members including guidance, training, information, governance support, financial management, development support and other services

Philip Avery/Welsh Sports Association October 2012

2. ABC

Dear Committee,

Below are our responses in bold to the consultation on the Regeneration bill:

Adfer Ban a Chwm (ABC) is a Building Preservation Trust whose aim is to restore derelict vernacular buildings in rural Wales,
with a subsidiary purpose of providing affordable housing in the first instance, or some other community use should this be more appropriate.

1. What is your feedback on lessons learnt from delivery to date? The focus seems to be mainly urban - towns and settlements, with little specifically addressing rural needs/regeneration.

2. Should other national outcomes or principles be considered? OK as is

3. What more can be done to achieve greater coherence and cross cutting action across departments? It is good to see a move towards longer programme cycles away from short termism. It is good to see the emphasis on working with 3rd sector organisations, though often the small ones which typically address more challenging needs in potentially more innovative ways are overlooked due to limited resources. Under 6.1.iv, it is critical that existing buildings are considered for affordable housing: empty properties and also derelict vernacular properties, especially in rural areas. Under Planning, it is crucial that there is flexibility to enable, encourage and incentivise the reuse of derelict buildings for affordable housing. Under Natural Environment, the embodied energy in existing buildings must not be overlooked. In addition, the use of local materials, locally sourced and supplied must be seen as an important aspect of regeneration

4. Do you agree with the national, regional and local approach set out? Yes

5. Do you have any comments on our proposals for how we will target and direct our funding? There is no mention of the Rural Housing Enablers as partners. These are the key agents working with local rural communities, identifying and addressing a need which is often hidden because there is nothing on offer or because people don't realise they qualify for affordable housing. Also, there needs to be a mapping of all rural assets/resources (empty properties, derelict properties etc), which together naturally address all three issues: housing, regeneration and heritage. In 6.3.iii, the significance of Place Based is so important for rural needs – another reason to target derelict buildings in the countryside as one approach to providing affordable housing.

6. We want to ensure effective monitoring and evaluation of regeneration activities, will the approach set out achieve this? It looks promising

Yours, Joanie Speers

3. Dave Price, Capita Symonds

I am in total agreement with the aspirations of this new framework and the need to engage with the private sector in creating sustainable regeneration, but this is much more difficult to achieve in practice as there are very few inducements for the private sector to engage with the public / third sector presently other than through BITC. I am attending the summit on the 15th and would like this topic explored.

4. RCT People First

Q 1. What can we learn from the things we have already done?

- * Involve people to make it better
- * Include everybody
- * Everybody should know what is going on
- * Public meetings should be held

Q 2. Our Vision : Are there other things we should do?

- * We need jobs for everybody who wants to work that includes people with learning disabilities
- * Encourage businesses to come to the valleys to create jobs
- * Support businesses to create jobs

Q 3. Are there other things we could do to work with others?

- * Make everything accessible
- * Make things simple language
- * Provide funding to third sector to continue to work with communities
- * Stop educational cuts in order to improve learning as this makes people more employable
- * Stop health cuts and increase funding to support health and well being as this improves confidence and self esteem and enables people to join in community activities, volunteering and eventually join the labour market.

Q 4. Do you think having 3 regions is a good idea?

Can you think of other things we could do?

Yes these groups should feed into each other

Q 5. What do you think about our ideas about what projects to fund??

Can you think of other things we could do?

- * Make sure that you involve people with learning disabilities and that information is easy read
- * Ok if the money there
- * Funding is needed to support self advocacy as this helps communities to advocate for others to ensure they have their voices heard

Q 6. What do you think about the way we want to check the results?

Are there other things we could do?

- * Will everybody get to see a report?
- * Will everybody get a chance to give their views?

Will it be in easy read?

Will all versions be released at the same time to allow the same time scale for consultation?

Will you consider people with learning disabilities from the beginning?

Please add any other comments. We look forward to hearing from you.

Please can you ensure that when you release future consultations that easy read versions are released at the same time to allow the same time scale for those with learning disabilities to voice their opinions.

There were 6 people with learning disabilities taking part in this consultation document it could have been a lot more.

Thanks

RCT People First Limited

5. Welsh Pharmaceutical Committee

The Welsh Pharmaceutical Committee are a statutory advisory committee whose main task is to provide expert professional advice to Welsh Ministers and Welsh Government officials on all matters relating to the Pharmaceutical profession. The committee has reviewed the consultation document and although there are no specific pharmacy issues the committee would be supportive of the proposals as set out in the consultation document.

6. Swansea Council for Voluntary Action

Response to the Vibrant and Viable Places New Regeneration Framework Consultation

The current Swansea Regeneration Area is made up of a small targeted geographic area of Swansea which includes the City Centre and the Communities 1st areas that ring the City. From its inception it has attempted to link its activities to the poorer areas and forge opportunities that, over time, will bring opportunities to the more disadvantaged citizens of the City.

In this respect, and compared to what we understand has happened in other regeneration areas, Swansea may well be the blueprint for the new approach suggested within the consultation of making much stronger linkages between designated regeneration areas and C1st areas.

For us at SCVS it is a no-brainer to design in tighter links between C1st activities and regeneration area activities.

Closer alignment will however not happen by default.

Should the City and County of Swansea be granted regeneration area funding for targeted projects in future, it will be very important to get the alignment right. A cross agency group must be established locally to drive the co-terminosity nature of both initiatives.

In a real sense, C1st staff etc ought to be the revenue funding resource of what is primarily a capital regeneration area fund. A problem with that, however, could be the skills and abilities of C1st staff – will they have the right ones??

No-one can argue with the proposed national outcomes of Prosperous, Learning and Healthier Communities. Some may however observe that the experience of C1st in relation to delivering such aspirational outcomes has perhaps been limited.

And also consideration needs to be given to our ability to use Outcomes Fund monies to establish and drive projects/initiatives that are demonstrably linking C1st activities to regeneration area activities. Can there be a fast track link between WG C1st and WG RA depts. to facilitate?

When the current Swansea Regeneration Area was established, SCVS was consulted very early on in the process by the WG delivery team and invited to be a partner in the strategic delivery process and also to provide advice and guidance about involving 3rd sector organisations in activities. A senior staff member has sat on the Steering Group throughout and the Director is on the SRA Board.

We believe that this has worked well and also believe that our City and County of Swansea colleagues and our WG BETS colleagues would agree that we have added value to the regeneration area both strategically and operationally. And we would hope that we would continue to be seen as a key partner.

Clearly a very key 3rd sector partner currently and in future must also be the housing associations / rsl's.

For example, Swansea Regeneration Area is working very closely with COASTAL Housing Association as a designer and deliverer of physical regeneration activities. Such relationships are critical for the future of regeneration activities in Swansea. It is laudable that more efficient ways of the WG working better together across all its departments to deliver joined up outcomes is being worked on. There is probably no easy answer to getting this right is there? Other than physically establishing multi-disciplinary delivery teams.

It should probably be noted though that at local levels partners in local government, the broader public sector and the 3rd sector do pull together on initiatives and do talk to each other about them. The Swansea Regeneration Area team are also easy to engage with.

We would note that key people from WG Directorates are often absent from local meetings. This is however also true in relation to other economic regeneration arena locally.

The regeneration activities that the Vibrant and Viable Places consultation is designed to address are a very small part of the regeneration agenda within our South West Wales region (and indeed Wales as a whole). Whilst the extra resource is welcome, the activities and accompanying cash resource must be closely linked to the much larger drivers for regional growth and wealth creation.

Where City Region status is likely to be granted – Swansea Bay City Region in our case – then the small budget available for strategic regeneration areas needs to be segued into the much larger potential budgets which will accompany that initiative. And any block grants to the area from Cohesion/post Convergence funding.

Indeed one of the best uses for any SRA monies may be as a match funding pot.

Whilst recognising that it is as yet unclear about delivery arrangements for the proposed city region or the regional regeneration strategy, such arrangements as they evolve may present opportunities for better joining up from local through to regional. They will certainly be a key forum for bringing forward projects for the proposed targeted regeneration area funding allocations.

Will a separate and potentially top heavy South West and Mid Regional Regeneration Board as proposed be necessary? Why not sit it within the regional structures that will probably exist by then? Indeed the RA staff could be physically sat within delivery teams for city region/regional regeneration strategy too.

And finally – RBA has yet to prove itself as an efficient and effective monitoring and evaluation tool within Wales. There may be a temptation to set low level, lowest common denominator targets that can be achieved under this regime, rather than aspirational and stretching targets which will need to be worked hard at.

7. Carmarthenshire County Borough Council Economic Development Department

The paper is generally well received by Carmarthenshire County Council as Welsh Government has set out a clear direction in which it sees Regeneration moving forward in Wales over the coming years. It welcomes the context in which the paper is set i.e. the current economic crisis, the current failure of retail and property led regeneration and the questioning of what the future role of town centres will have within society, as these are realistic and important factors that need serious consideration in determining how regeneration could or should function in the future in Wales. The definition of regeneration is also seen positively in that integration, lasting improvement and the targeting of market failure are each seen as essential in any type of regeneration.

Reference is made to have a 10/15 year programme cycles which move away from short term political cycles is very welcomed as it enables projects to be able to deliver

over longer periods which are often needed to experience the true impact of regeneration programmes. However caution should also be given to this approach as without proper review periods during its delivery, programmes could become out of touch, as its original purpose and the economic climate in which it operates could change over time. If such cycles are adopted then regular reviews would be required. Carmarthenshire County Council has assessed the paper and offers the following comments in relation to each of the questions presented:

Question 1: What is the feedback on lessons learnt from delivery to date?

- In relation to our experience with Welsh Government on the Western Valleys Regeneration area we offer the following comments:

Positives

- Steering group worked well in that it brought senior level of personnel together from across the area to tackle the issues facing the area.
- The programme was relatively flexible in that it tackled strategic and local issues.
- Relationships between WG officers and council officers worked well with both organisations working towards shared goals.
- The programme has ensured that the area has benefitted from significant investment from WG, for CCC and this has enabled further funding to be secured and therefore bringing better value for the public pound

Negatives

- The VARP element of the programme lacked structure with all local authorities involved taking slightly different routes with differing outcomes. The message at the outset on how this was to work, was not particularly clear, and the VARP raised expectations in areas which in reality could not ever be fully delivered due to limited budgets. Clear direction and measurable targets should have been agreed at the outset of the programme. There are opportunities here to integrate with future C1st clusters/partnerships.
- Grant awards were often very late within a financial year and this did not assist in the delivery of projects which often were restricted to be delivered by end of financial year deadlines, creating unnecessary pressures.
- Roles and responsibilities of what was expected of the local authorities and Welsh Government officers were unclear at the outset – this should be improved and be clearly defined in the forthcoming programmes.
- Confusion arose throughout the programme as to whether or not there was revenue funding available under the programme – again mixed messages were received by Forums and this needs to be clear going forward.
- The use of private sector as a worthwhile partner to deliver regeneration was not fully utilised. Private sector need to have a stronger role in the future.
- Outputs from the programme seemed to emerge very late in the programme and seemed to be retrospectively applied to the process.
- The approval of projects seemed to be very piecemeal – the overall strategic approach needs strengthening. Baseline data has been prepared previously

and the issues still remain – if funding is to be targeted at the same areas as previously then a formal review of this information already prepared may prove useful moving forward. We do not need to re invent the wheel as much work was done.

- The Ministerial role for future programme needs to be examined in that local decision making is vital for engagement and efficient delivery structures.
- Budgets inflexible and set – need to change this format.

Question 2: Should other national outcomes or principles be considered?

- Outcomes aligned with Communities First objectives – these outcomes are wide reaching and there is an opportunity that any project could be hooked on some part of these objectives.
- In South West Wales there is need to refer back to the emerging South West Wales Regional Economic Development Strategy and its objectives to ensure there is alignment at National and regional level. As a region this document will identify regional outcomes/ objectives and consideration of the regional objectives is needed by the national level policy before it is finalised.
- Consideration must be made of the emerging City Regions model and future RDP and Convergence structures.
- Alignment of Ministerial Portfolios, Policies and outcomes would be welcomed.
- Question whether or not there should be reference in outcomes as to how projects would have a positive impact upon GVA and improve an area's productivity.

Question 3: What more can be done to achieve greater coherence and cross-cutting actions across Departments?

- Programmes need to be more flexible and have more autonomy.
- With multi Ministerial portfolios, there is a need to ensure policies emerging from WG are not conflicting and they are aligned.
- Need to be more radical thinking and have a special purpose-led vehicle to assist the process across WG.
- Be more flexible and take more risk on projects. Need to take some calculated risks on projects to get things moving/failure in some areas is not a weakness.
- Need strong leadership at both national and regional level to secure buy in across Departments at WG and LA level.
- WG Officers need to be seconded out and be at the “coal-face” in the delivery of Regeneration projects across Wales it will give better understanding of the need to work across departments and organisations.

Question 4: Do you agree with the national, regional and local approach set out?

- The overall approach is welcomed but duplication of existing forums should be avoided – use existing vehicles which are already established where possible.
- Clarity and exact terms of reference required for each of the tiers proposed needs to be set at the outset to avoid any confusion.

Question 5: Do you have any comments on our proposals for how we will target and direct our funding?

- We welcome evidence based targeting of resources based upon plans which have been built up locally but there is a wish that the process does not become too burdensome compared to the outcome that is trying to be achieved i.e. process outweighs the outcome.
- We also welcome both people based and placed based regeneration as the both go hand in hand.
- Reference is made to “continued funding will be dependent on well evidenced achievement of outcomes”. We believe that this needs to be flexible as often in Regeneration projects original targets are not always achieved or the achievements could take a number of years to materialise. Project sponsors should not be punished if original planned outcomes are not achieved if reasonable evidence is provided as to why certain outcomes are not achieved.
- Resource invested should have a positive impact on improving GDP and GVA, so we need to ensure that all investment has an economic impact.
- Clarity is required over the “other specific regeneration outcomes (to be determined)” – it seems that they have not all been defined yet?
- It’s good to see that funding will be allocated in the first instance to the regions and the local area to develop baseline evidence to provide evidence for business cases for investment in the regions. However as mentioned previously much work has already been done here on the previous RA areas, local regeneration plans, City Region business cases and the South West Wales Economic Regeneration Strategy.
- The 7 areas identified under the successful places heading are supported fully.
- There is a question whether or not the coastal Communities Fund, Homes and Places Community Innovation Grant and RIFW could be amalgamated and a central fund be established which can be dipped into to achieve the national outcomes suggested?
- Clear interpretation regarding Local Growth Zones required and what it means potentially for region.
- The design and criteria proposals suggest that location and proximity to Communities First is going to be a key consideration then there are likely to be large gaps across Wales with little Regeneration activity. How will this be filled?
- If the Treasury Green Book approach to regeneration is to be followed then projects will take some time to develop and prepare. This fact needs to be reflected in the deadlines set in WG for bids to be submitted.
- The 13/14 transitional year is to be welcomed – Carmarthenshire would possibly like to be considered for BID funding if an opportunity arises.
- How does the report on rates review fit, where is this reflected in the report - how does this influence targeted areas?

Question 6: WG want to ensure effective monitoring and evaluation of regeneration activities, will the approach set out achieve this?

- WG need to be clear at the outset what is required and be prescriptive.

- Clarity on what is expected of us in terms of input into the monitoring and evaluation process.
- Need guidance on process and possible training/ workshops together with support from WG officers to work with us from the outset.
- Clarity on baseline information and economic impact and jobs

I trust the above provides sufficient feedback on the draft consultation document. However, should you require any further feedback or clarification on any of the issues raised then please do not hesitate to contact the authority.

Economic Development
Carmarthenshire County Council
18th December 2012

8. Merthyr Tydfil County Borough Council

VIBRANT AND VIABLE PLACES: NEW REGENERATION FRAMEWORK: WELSH GOVERNMENT

1. What is your feedback on lessons learnt from delivery to date?

Response:

Community First - To make a significant impact within CF areas there needs to be a strategic approach adopted by WG across all of Wales - with a clear outcomes framework similar to Families First. Adopting this approach will mean that outcomes that clearly contribute to the regeneration agenda can be measured and compared across Wales. The inconsistent approach to communication between WG, Local Authorities and community groups has created confusion amongst all key stakeholders. There is a need to ensure WG adopt an approach which has been implemented by WEFO where communication is only progressed through the Grant Recipient Body (GRB) to ensure progress is coordinated and impact monitoring information is gathered and analysed.

Structural Funds – Consideration is needed to ensure how the structural funds are maximised to benefit those individuals and communities in most need. The Welsh interpretation of the structural funds and the link to mainstream DWP funding has been a major barrier to ensuring an integrated approach between mainstream provision and services funded through ESF to maximise the full potential of the programmes.

WG approach to policy development and project implementation has been inconsistent. WG should not be directly involved in coordinating and managing projects, this should be left to other organisations. Thus the liabilities for implementation and achieving outcomes are with other organisations not with WG. There is a need to ensure a clearer definition for roles and responsibilities of key stakeholders in terms of national and local structures, eg. Welsh Government responsible for policy and local government developing systems and structures for implementation. In projects such as job match there was complete confusion where liabilities lie and who was actually managing staff.

Flying Start – There is a need to ensure the Flying Start developments are integrated within the wider strategic local plans of CF and Family First and mainstream services such as Social Services. Operating Flying Start as a standalone national project

limits the impact of a 'THINK FAMILY' approach to addressing economic inactivity rates and child poverty and the specific needs of local communities. It is vital for local people and communities not only to participate and buy into programmes such as Flying Start, CF and Families First and therefore it is critical to be driven by local needs not one national project.

There is a linked and wider issue to add here too which is about how all funding streams are co-ordinated both nationally and locally in a complementary rather than conflicting way and also that they are evaluated in a way that allows us to see how they are impacting on outcomes across a range of needs. This will be particularly so as we move towards the Wellbeing Bill agenda and the need to ensure that funding streams are actually impacting on those most in need. This is as applicable to economic re-generation schemes as it is to other funding streams.

Housing led regeneration – There is a need to ensure local authorities establish measurable long term strategies that demonstrates links to local, regional and national policies.

- Broad objectives v Flexible funding: Broad objectives had benefits and has supported the strength of the model in enabling flexible local delivery which enabled each area to deliver tailored solution to meet local needs, e.g. Merthyr had a heritage led focus and the funding has enabled this to be delivered, whereas other areas had other focuses
- Application process: Consistency and clear guidance across funding applications – EU, HOV, TMF and a need to have one application process using the five case business model with clear criteria for assessment which needs to be made clear from the outset.
- Funding: funding for project development/R&D is needed to help with scoping of project and more accurate programming and budget, funding to be allocated be for the entire projects/programme of work as opposed to annual allocation, funding from different arms of WG to be coordinated and managed by one team i.e. HOV, TMF, EU all managed by same WG contact
- Private Sector involvement: market failure has made this difficult, along with a lack of a mechanism to engage with private sector, other than at a local level. BID & Town Centre Partnerships help locally but there is a need to improve coordination regionally and nationally. RIFW has also not proved to have a significant impact.
- Collaborative working: This is seen as positive. Key examples include the Valley's Renaissance Group and the VRP model. These have brought people together who would not otherwise have interacted and encouraged learning to be shared across borders and sectors.
- Strategic planning across areas: This has not worked as well as it could do and needs strengthening, particularly to support collaborative working across town centre regeneration, broadband and transport connectivity to support town centre economic regeneration through making the physical environment more attractive, improving transport connections and broadband connectivity. This will support town centre's roles as transport hubs, which with better ICT connections will draw inward investment and generate demand for office space to fill the gaps generated by the decline of retail on the high street.

- Local level delivery: This worked well. LA's have a good understanding of local need, but the changes to the CF programme will impact on this for the next programme.
- Levering in of additional funding: This worked well and HOV money was used to lever in a range of funding from other sources including: HLF, BLF, ERDF.
- Rigid Boundaries: using Rural, WIMD or CF areas as criteria for funding meant that cross area working which would have been beneficial to deprived areas was not possible. For example in the Taff Bargoed Valley Bedlinog Ward is rural whereas Treharris is not. This prevented cross area working where projects, for example a venue to sell products made in the rural area could have been in an urban area and still benefit people living in the rural area. Similarly areas of high unemployment were not able to link with areas of opportunity. For example ESF funding could have been used to generate training opportunities outside of Merthyr in more affluent areas which have different opportunities. For example people being trained in hospitality could be supported to access employment opportunities in Cardiff at high quality hotels through investment in transport infrastructure across boundaries.

2. Should other national outcomes or principles be considered?

Response:

There is a need to ensure quality employment opportunities are created. This should mean competitive salaries that will ensure a reduction in child poverty. It is not enough for WG to specify increasing employment particularly when in work poverty is on the rise. There is also a need to ensure to link with the apprenticeship agenda to provide a range of apprenticeship opportunities ranging from housing maintenance to housing management.

Also need to consider an additional outcome measure 'Sustainable Families'. This outcome provides a strategic focus for strategic policies such as Family First and Flying Start and is consistent with the Welsh Government's approach to integrated family support services. There also needs to be a clear connection to the emerging priorities set out in WG's Social Care & Wellbeing Bill.

Outcome One: Prosperous Communities

- Improved levels of economic activity.
- Strong and diverse local economies with private, public and third sectors working together.
- Well-connected communities supported by transport and broadband connections.
- Sustainable use of the natural environment to establish local energy and food production.
- A thriving private sector and social enterprise.
- Successful town centres and seaside towns.
- A well managed historic and natural environment contributing to the distinctive character of Wales' landscape and towns with heritage conserved.
- Increase the Salary income levels.
- Increase apprenticeships.

Outcome Two: Learning Communities:

- A skilled and confident existing and future workforce.
- A high aspiration local culture.
- Engagement with school, post 16 and adult learning opportunities.

- Clear opportunities for development of social and cultural capital.
- A belief in a better future.
- Good quality childcare.

Outcome Three: Healthier communities

- Healthy communities able to grow and work together.
- Safe and secure locality.
- Communities that safeguard their most vulnerable members from significant harm.
- Good housing which is affordable and provides tenure choice.
- Sustainable and quality local environment.
- Positive and cohesive local identities.
- Well planned, appropriately used and good standard buildings, amenities and facilities.

Outcome Four: Sustainable Families

- Independent Families
 - Safeguarding.
 - Employment.
 - Wellbeing.
- Well connected communities should include reference to sustainable transport and green infrastructure to enable development of cycling and walking routes linked to public transport, the standard of public transport should be improved, along with its convenience and ability to connect people to employment

3. What more can be done to achieve greater coherence and cross cutting action across departments?

Response:

Establish a national regeneration Framework for key performance indicators which covers all programmes. Each programme on a national and local basis should demonstrate how they plan against the overall framework under either a Physical Regeneration Framework or a Social Regeneration Framework.

This could be a requirement to embed these developments into the Strategic Integrated Plan. (SIP)

WG also need to enforce all funding streams to both Public and 3rd sector organisations are reference in local SIPs and the expected outcomes are monitored against the local strategic planning framework. This will require a local structure for performance management arrangements for data collection, analysis and reporting.

Whilst the document sets out a list of relevant departments/organisations/sectors little is said as to how this will be achieved. Previous experience has shown that organisations from different sectors have different agendas and cultures. This often leads to culture clash, breakdowns in communication and ineffective working. People just can't understand each other.

Questions are raised over the effectiveness of partnering arrangements. There is a basic clash between public and private – public seeks best value, private seeks highest profits.

Alignment of priorities needs to take account of retail and housing which have been difficult to support under the current programme and which as a result tends to not support joint working in these areas beyond coordination at a local level. This has also made working with private investors on mixed use developments difficult as RIFW shows and also at a local level the implementation of a building enhancement scheme.

Cross working and coherence needs to be developed at a local level to push this agenda. Without this it will be hard to develop at regional and national level. Coordination across areas needs to be supported by mechanism and systems to reduce duplication and encourage joint working. This section needs more detail on how this can work in practice across departments and ministerial areas.

4. Do you agree with the national, regional and local approach set out?

Response:

There is a clear danger that a regional approach is seen as the answer to all regeneration issues, and when dealing with people and communities issues this is clearly not the case. Whilst physical and social regeneration are interrelated there is a distinct difference in approach to development. Whilst a regional/all Wales policy could be driven for the development of buildings/houses, it is not the case for people issues. The people side to regeneration often involves other service areas such as local 3rd sector providers, children and adult social services where local decisions are made. Governance arrangements on a regional basis must be clearly understood before any agreements are reached. Until this is understood and approached consistently the developments will only progress as fast as the slowest partner. There is the potential that one partner may prevent progress due to conflicting priorities operationally, which would jeopardise the overall regional approach.

Welsh Government Policies need to be realigned as the first step to any regional developments to reduce the confusion and conflict. Currently there is a drive to ensure local LSBs are a driving force for development and coordination of key areas, there needs to be further consultation on their roles vis a vis a regional approach. Setting up a structure which does not directly include the LSBs could potentially result in duplication of effort and limit the impact of the proposed policies.

There needs to be clarity whether Welsh Government is to focus on policy development and monitoring or also include a role for delivery. Local delivery should clearly rest with Local Authorities and the third sector. The Jobmatch Model is a prime example where Policy through HOV was compromised due to WG officers seeking to develop policy and manage implementation.

We agree with the proposed approach but have the following comments/questions:

- The proposal to include Bridgend in two areas is confusing
- Will this create an additional layer of bureaucracy
- How will the regions work with existing boards in health, Education and social regeneration (CF)
- Mapping is a good idea, we need data and look forward to the results
- Links between areas need to be developed e.g. Merthyr is accessible from a wide area to the north, south, west and east. The regional approach needs

to set out how links with areas or opportunity can be developed. The role of each tier needs to be explicit in the document.

5. Do you have any comments on our proposals for how we will target and direct our funding?

Response:

It is unclear what the formulae approach will be based upon to know whether this is right or wrong for the area.

There is a need for WG to really consider the implementation and removal of procurement red tape especially when leverage of EU funding. A number of the issues in terms of EU funding and collaboration is clearly left to interpretation. We want to ensure effective monitoring and evaluation of regeneration activities; will the approach set out achieve this?

Response:

Result Based Accountability is key for managing and monitoring impact; however the population outcome measures need to be relevant. For example, the impact of these activities will need to be monitored on the basis of new and sustainable jobs created, new businesses developed, economic inactivity rates, income levels increased etc. – otherwise pointless measurements. A number of national programmes are still struggling to establish national outcome monitoring measures which would restrict the monitoring of impact across a regional strategic plan.

Funding streams should be developed for the following:

- Green infrastructure – trails linked to transport hubs and town centres, development of open spaces
- Low carbon economy – support for integrated schemes which support access to employment, green jobs, green energy
- Connectivity, broadband and transport – earlier in the text reference is made to the need to support these but no funding stream is allocated
- Heritage led regeneration
- Housing renewal should be strategically linked with physical infrastructure and not on its own

Strategic Frameworks: focus on town centres

Physical Regeneration of town centres in deprived areas has demonstrated, through the impacts of previous investment, to be an effective means of regenerating communities where their poor appearance acts as an inhibitor to residential, tourism, and commercial investment.

Improving the quality of local townscapes has a beneficial affect on perceptions of an area which linked to Local Development Plans, economic development and social regeneration strategies can induce inward investment.

Town centre improvements enable actions which support sustainable economic and social development to create sustainable communities. As physical regeneration supports a wide range of development activity it is important that this is reflected in the frameworks.

Sustainable communities meet the diverse needs of existing and future residents, their children and other users, contribute to a high quality of life and provide opportunity and choice. They achieve this in ways that make effective use of natural resources, enhance the environment, promote social cohesion and inclusion and strengthen economic prosperity.

The built environment is identified in the review as a key component for creating a sustainable community. It is necessary to create a sense of place, a place with a positive 'feeling' for people, and local distinctiveness with well-maintained, local, user-friendly public and green spaces with facilities for everyone including children and older people. Along with a high quality, well-designed built environment of appropriate size, scale, density, design and layout that complements the distinctive local character of the community, and high quality, mixed-use, durable, flexible and adaptable buildings that meet community needs.

The frameworks could include criteria to ensure that town/village centre regeneration supports the development of sustainable communities which are measured on the following:

Economy: attracts businesses to the area which strengthen the local business community that has been weakened by years of decline.

Services: supports the provision of range of accessible, affordable public, community, voluntary and private services (eg retail, food, commercial, utilities).

Social & Cultural: creating the places and environments in which local heritage and culture can thrive.

Equitable: where people have a sense of community identity and belonging, with opportunities for outdoor cultural and leisure activities and reduced levels of anti-social behaviour.

Transport & Connectivity: enhancing access to transport, making it more appealing to pedestrians. A more pedestrian friendly environment in town should assist people to make greener transport choices. Physical improvements linked to the transport infrastructure (particularly public, pedestrian and cycle routes) can lead to the regeneration of communities with revitalised bus/railways stations, safer more attractive pedestrian and cycle links, thriving local shopping and service areas and opportunities for further developments.

Environment: use materials which fit the local character and methods which will reduce the carbon footprint of the project and create a public realm which is sustainable and long lasting.

The hard outcomes of physical regeneration can be measured in the short term but the impact on economic and social regeneration can take some time to realize. For example projects implemented under Objective One and completed in 2008, and taking account of the economic downturn, are only just now starting to have an effect with footfall increasing and new businesses opening, as is happening in Merthyr Tydfil's café quarter. This delay in the impacts being realized is reinforced by research undertaken in England:

'...many of these projects will not realize their full benefits for many years, and independent evaluation suggests a potential return over their full lives of £8 for every pound spent. Evaluation also shows that RDA intervention involving more direct support to business represents a better return both in the short term (£7.30 per pound spent) and long-term (£11.60 per pound spent). Physical regeneration projects generate other social, economic and environmental benefits that are more difficult to measure, such as building investor confidence and tackling squalor and deprivation.

Regional Development Agencies' support to physical regeneration projects, REPORT BY THE COMPTROLLER AND AUDITOR GENERAL, HC 214, SESSION 2009–2010, 30 MARCH 2010

There was limited evaluation carried out under Objective One in Wales, but under the convergence programme more robust data is being produced, this is supported by the work being carried out under the review of the SRA's in Wales commissioned by the Welsh Government, and should by 2015 provide a robust picture of the impact of town centre regeneration on the Welsh economy. However there is a need to capture this data more consistently and for longer periods to fully demonstrate the impact of physical regeneration as the quote above illustrates.

6. We want to ensure effective monitoring and evaluation of regeneration activities, will the approach set out achieve this?

We support the use of RBA and an outcomes approach to evaluation but it should be complimented by a formative process which enables learning and capture of data which is less tangible. Whilst much of what we are trying to achieve can be measured in terms of quantitative data still more can be gained by using softer approaches to measure changing perceptions. The local community should also be more involved and evaluation should be underpinned by a set of values to ensure inclusion by all relevant groups in the process of setting outcomes and the process of measuring progress towards them. There is a concern that this will become a prescriptive process and not a true learning process.

9. Aberystwyth Regeneration Area Workshop

What is your feedback on lessons learnt from delivery to date?

- Starting point is a strong one – no need for much change.
- The Regeneration Area governance structure has worked well in Aberystwyth; it has been good to have decisions made at the local level.
- Partnership Board approach well received – consensus on action plan and projects supported. Collaboration is key.
- The third level in hierarchy (local) is key, there needs to be local engagement and consultation.
- Local delivery is vital; this can then feed up to the regional level.
- Aberystwyth has benefitted from a long term plan and funding approved from the outset giving confidence to plan ahead and lead-in time for developing projects.

What more can be done to achieve greater coherence and cross cutting action across departments?

- More needs to be done to ensure that work across Ministerial portfolios are joined up e.g. Enterprise Zones, Communities First. How are you going to achieve this?
- What are the links between the Enterprise Minister's approach and the Regeneration Minister's approach?
- Consideration needed on greater coherence across areas. Is it practical to work collaboratively across such a large area? Distance is difficult, time-consuming, unmanageable.
- Consideration needed regarding collaboration across boundaries and with areas in England. Travel to work area is more important than local authority boundaries.

Do you agree with the national, regional and local approach set out?

- How will the three regional partnerships work? More detail needed...
- How does this approach link in with the Wales Spatial Plan approach? Isn't what is being proposed the same thing? Is the WSP influencing this approach?
- This approach will need to link in with the Communities First clusters being taken forward.
- Struggle to see how mid Wales can be lumped in with Swansea. People need to remember that mid Wales is not the desert between north and south Wales.
- Concerns regarding rural areas being forgotten in the face of a strong voice for urban regeneration. A lot of rural deprivation is hidden amongst the most commonly used measures of deprivation (e.g. WIMD). What has Powys in common with Swansea and Neath Port Talbot?
- Rural dimension isn't reflected. Although rural Wales doesn't feature highly in combined deprivation indices, it does suffer from specific / individual measures such as accessibility, health, housing etc.
- Travel to work areas are not considered in the document.
- Will the three new WLGA Boards be moved gently towards Regeneration?
- Add the private and third sectors to these Boards and it becomes a huge board and very cumbersome when it comes to decision making. Are the Local Authorities considered inept when it comes to making decisions?
- For example, south east could have 10 LA members, add the WG representatives, private sector and voluntary sector. It becomes a very large Board.
- A local delivery board is needed to feed in to the regional Boards – that is very useful.
- Agreement from all at the meeting that mid Wales was being 'lumped in' with someone else.
- Discussion regarding physical connectivity between mid and the south West.
- The local and national seem to already be coming together but there are issues surrounding the regional suggestions. What will be the powers of these boards? Will they be elected?

We want to ensure effective monitoring and evaluation of regeneration activities; will the approach set out achieve this?

- What is the starting point for Prosperous, Learning and Healthy Communities? The focus should be on the most deprived within those categories, but there are issues with proving deprivation in rural communities.
- Need to reflect 'areas of need' and 'areas of opportunity'. How do you measure each one? Two separate set of criteria?
- What are the statistics that show what we need to be doing?
- More detail needed over statistics – this needs to drive our focus and proposed activity / interventions.

Do you have any comments on our proposals for how we will target and direct our funding?

- Local business plans – how are they going to be created? A mid and south Wales plan would not be local. Who will write these plans? Will it be the WG Regeneration Team? Will this mean more bureaucrats?

- Some of North Wales' population can commute to work to Manchester and Liverpool; South Wales' to Bristol, Aberystwyth is too far and too inconvenient to be able to travel to a large urban centre where there is more economic inactivity.
- Should all the money be spent on infrastructure that would assist the economy of the area, more than anything else?
- There needs to be an hourly train service to Aberystwyth, that would assist in the town becoming an economic hub for a much wider area (e.g. you can get a train from Machynlleth to Aberystwyth before 9am but not from Newtown)
- Consider the Simpson Report on non-geographical collaboration.
- Huge issues regarding connectivity in mid Wales, not just distances but the time it takes to travel those distances. Some areas only have buses once a week.
- When economic, social and physical regeneration are considered there are gaps in the seven aspects mentioned.
- Results Based Accountability needs to be considered and integral to the process.
- Potential University Spin-Outs need to be considered to make the most of and retain the talent Ceredigion has.
- How will regeneration address the areas where data shows there are failures?
- Place regeneration, people regeneration or 'bringing' in regeneration – which are often in conflict, what is done where?

Should other national outcomes or principles be considered?

- Issues around Carbon footprint explicitly need to be included as well as sustainability.
- In view of recent census results the Welsh language needs to be considered and a cross-cutting theme.
- The creative industries are an important income generator in this area.

10. Wrexham County Borough Council

Question 1:

What is your feedback on the lessons learnt to date?

The case studies presented in this section provide a wide spread of examples in regeneration practice across Wales, however the recent review of City Regions highlighted the importance of cross-border relationships between Wrexham County Borough and Flintshire and Cheshire West and Chester, in particular. The regeneration priorities for Wales need to reflect the importance of this relationship for the economic property of North East Wales and consequently the creation of opportunities for this part of Wales to prosper (this is further emphasised in the response to the answer Question 4). Further more, whilst the lessons learnt to date do focus on the seven Regeneration Areas there are lessons learnt from the Communities First programme that could further add value and insight into the proposed Regeneration Framework.

Question 2:

Should other national outcomes or principles be considered?

Consistency with other Welsh Government programmes is welcomed. However we would like to make the following points:

1. there needs to be clarity regarding the direct and indirect outcomes of the regeneration framework; there are clearly outcomes described that will directly result from the range of activity described in section 6.5 of the consultation document and there are a number of indirect outcomes that can be achieved. To assist with the clarity regarding priorities funded through this Regeneration Framework we recommend that this distinction is made. It is also important that there is sufficient between Welsh Government programmes in order to avoid duplication clarity of focus or misunderstanding in funding activities between each of the Programmes;
2. we understand that further detail will be provided with regard to how each of the outcomes will be measured. However there is general inconsistency across Wales on this kind of information being collected across the suggested outcomes. In order to measure the success of the Regeneration Framework, clear measures, a robust baseline and a coordinated approach to the collation of information is essential;
3. we would emphasise the need for a greater focus on sustainability, especially in light of Welsh Government's forthcoming Sustainable Bill, which will place a duty on the public sector to plan for the long term by clearly integrating social economic and environmental outcomes;
4. we are concerned that important issues such as affordable housing and choice of tenure may get lost amongst a wider regeneration agenda and therefore be considered of 'less importance'; and
5. we agree that it is imperative that the outcomes are aligned to the Welsh Government's Programme for Government.

Question 3:

What more can be done to achieve greater coherence and cross cutting action across departments?

The consultation document does not make it clear how Welsh Government will achieve greater coherence and cross cutting action across departments. Further information is required. However we would commend the commitment from WG that there is going to be a whole Government approach to this agenda and that all departments will "sign up to" the regeneration approach. It is very important that regeneration is not just seen as important to this particular ministerial portfolio.

We welcome the recognition of the links between regeneration and the wider determinants of health, such as transport, housing and work and the use of Health Impact assessments is supported. Regeneration can play a significant role in creating leptogenic environments, thus supporting physical activity and promoting good mental well-being. Whilst the regeneration role is recognised, we are unclear as to what role regeneration will play in terms of the specific references to healthy eating and smoking cessation. Smoking cessation in particular is, we would suggest, a more operational role and one that on the whole, is lead by our colleagues in the Smoking Cessation service. Whilst we welcome the opportunities to work closer with partners we are concerned that some of these more service specific statements are not helpful in terms of obtaining clarity in terms of role and responsibility.

Within the consultation document reference is made to a number of other Government programmes and priorities that exist under existing governance arrangements. Reference at one point is made to 'tackling physical and mental health problems will continue to be an essential component of our regeneration

activity, with incentives to encourage more active lifestyles, healthy eating and smoking cessation'. Whilst we welcome the joining up of programmes, this activity is clearly the focus of the Health and Social Care activity ongoing under the legacy of the Health Social Care and Wellbeing Strategy. Clarity is required in establishing whose responsibility this is, in order to establish accountability in this area.

Over the last nine months, we have worked closely with Welsh Government to pilot how deprived urban communities can become more resilient to future long term challenges. This has involved bringing together a range of stakeholders, and different parts of the local community. We would like to see this model of integrated working developed further across Wales in the future, and welcome the fact that the Climate Change Pathfinders across Wales will become Place Co-ordinators from January 2012 to help to facilitate this.

We recommend that Welsh Government clarify the mechanisms that will be put in place to achieve greater coherence and cross cutting actions; how bureaucracy can be reduced; and confirm that by bringing together a number of key strategic areas into one document WG will not lose sight of key priorities within each of theme for example, the economy, culture and housing agendas.

Question 4:

Do you agree with the national, regional and local approach set out?

Consideration of a local, regional and national approach to regeneration is helpful in that regeneration as defined within the consultation document is influenced by local, regional and national activities, policies and strategies. However, in order to achieve useful connections between the three layers effective conversations and co-ordination within the three layers will be essential.

The need for a cohesive regional approach is acknowledged. However, the creation of new Regional Boards is questioned. It seems more sensible to review and adapt existing structures than to create more. This would otherwise add further bureaucracy, which is unnecessary. In North Wales, the new "Economic Ambition Board (comprising the 6 North Wales LAs), working with the North Wales Economic Forum (in its new guise) could provide the basis of the "Regional Board" for the delivery of the regeneration priorities for North Wales – although it is accepted that further work is required to ensure that any Board is representative of the whole region.

As referred to in the document the economy does not limit itself to local boundaries or indeed to any administrative boundaries. However there is acceptance that for administrative purposes boundaries do need to be drawn. However there is concern that the three regions identified within the document are inconsistent with a number of other regional approaches that have been identified by Welsh Government, for example Communities First will be operating within the Health Board regional boundaries; and there are different boundaries again within the skills sector and for the Police Authorities. Consistency with regards to a regional map of Wales is welcomed.

Furthermore, whilst recognising that regeneration is not limited to regional boundaries there is no mention in the document of any cross border relationship with England. In

North East Wales we recognise the interdependence between NE Wales and the Cheshire West and Chester in particular, in terms of transport infrastructure, employment and skills, leisure; recreation and retail opportunities and access to health care, to name but a few. This is recognised in the sub region through a partnership between neighbouring authorities referred to as the Mersey Dee Alliance.

We recommend that the Regeneration Framework acknowledges the potential of the North Wales Economic Ambition Board and recognises the economic linkages defined by the Mersey Dee Alliance; seeks some consistency of Wales's regional boundaries; and reduces duplication in partnership structures.

With reference to the Governance of such arrangements further information is required as follows:

- (i) More detailed information regarding the processes which would allow elected Members and officers from each local authority to input into determining the regional/national outcomes.
- (ii) Who would be represented on the Board[s]?
- (iii) What safeguards would be put in place to ensure equal involvement of all parties and agencies who would be working together?
- (iv) How would the different governance arrangements of the various partners be successfully merged to ensure successful accountability, sustainability and effective scrutiny of the proposals once they were established?

Question 5:

Do you have any comments on our proposals for how we will target and direct our funding?

The document remains silent on the level of funding across Wales and specifically the formula that will be used to allocate funding to the regions and indeed whether it is additional funding or existing funding repackaged. Therefore, the comments in relation to this question can only be given in relation to the seven points listed in section 6.5i. Neither can we comment on the governance of such funding decisions until further information regarding the role of the Regional Partnership Board is made available.

We welcome more information on this and further time to comment upon the level of funding and the formula to be used for allocations; particularly details regarding which existing funding streams will form the overall allocation to the Regional Board and how further funding for schemes such as Housing Renewal will operate. We recommend that there is a balanced approach to this formula and that it should be based on a per capita approach.

In terms of the seven focal areas for investment:

Investment in Town Centres is a key priority for Wrexham Council and additional funding to invest in town centre management, meanwhile uses of town centre premises and development of a Business Improvement District are welcomed and directly support our local priorities.

Destination management is equally a matter of high priority for the Council and one where further investment linking into the tourism development agenda is welcomed.

Enhanced marketing both in terms of tourism and particularly inward investment are recognised as key priorities as part of our ongoing regional work under the auspice of the Economic Ambition Board again further investment and linkage to national policies are welcomed.

Housing

The links between housing and regeneration are clear as is the contribution that housing development, regeneration and renewal can make to improving health, quality of life and communities.

The draft regeneration framework and the recent Welsh Government White Paper ‘Homes for Wales’ need to work together to deliver appropriate outcomes e.g.:

- Clear joining up of funding streams available to support housing and regeneration both at a strategic and individual property level
- Streamlining of mechanisms and departments distributing funding to avoid duplication
- Links to other national initiatives such as the Green Deal
- Both need to ensure sustainable outcomes also meet the long term challenge of adapting to climate change
- Affordable housing and affordability is a key agenda both for the Welsh Government and Wrexham County Borough and the Housing white Papers makes a commitment to increasing the supply of affordable housing in Wales by 7,500 during the lifetime of this government. Affordable housing can play a key role in town centre regeneration and the need to consider future social housing grant allocation in the context of wider regeneration initiatives may be appropriate e.g. Wrexham’s Affordable Housing Project (supported by £7.2m Social Housing Grant and of which the Welsh Government is a partner) is contributing to the wider regeneration agenda by bringing town centre brown field sites back into use by providing 226 new affordable homes, along with providing new community centre and clinic facilities as a partnership between the Local Authority, registered social Landlords and the Local Health Board to include Hightown Communities First. Training and employment, along with local supply chains is a key element of the project and demonstrates how provision of affordable homes can support neighbourhood and town centre regeneration within a partnership agenda.
- Bringing empty homes back into use can positively contribute to community regeneration and the funding recently made available under the Houses into Homes scheme along with the Welsh Governments Housing white paper commitment to bring 5,000 empty properties back into use is welcome.
- We support the proposed acceleration of Welsh Government land release that will contribute to providing more affordable homes and town centre regeneration – this needs to be extended to include release of surplus land in the ownership of other statutory authorities and agencies.
- The benefits of housing led regeneration are proven, not least in the success of renewal areas. We acknowledge that grant funding is limited and likely to reduce further in forthcoming years with a shift to recyclable loan funding and are keen to

explore opportunities to develop either a local or regional or contribute to the development of a national loan scheme.

- Accessing private sector funding and developing innovative financial models to support regeneration will also be critical and the current progress in developing the Welsh government sponsored housing revenue grant to support affordable housing provides a good example of how private funding may be levered in when supported by the Welsh Government.

Areas of Opportunity

We also request that there is an increased emphasis and clarity of understanding with regard to the investment into the physical development of sites and wider areas. For example the Council was successful in gaining World Heritage Status for a key site of historical industrial importance in the Pontcysyllte Aqueduct and Canal. This offers a wealth of opportunities to attract visitors to North Wales, yet without investment into the physical infrastructure the potential cannot be realised.

There are areas of opportunity within North Wales (as is the case across Wales) where investment in key sites can open up economic benefits across the region such as key employment, retail and tourism sites such as Pontcysyllte Aqueduct, Wrexham Industrial Estate, and Wrexham Town Centre. We suggest that there is more emphasis in the strategy on investment being targeted at these areas of opportunity, especially areas that do not benefit from existing structural funds programmes.

Furthermore, whilst there is considerable emphasis on collecting information and evidence at the local level, it is not clear that this will be undertaken when the priorities will be set at a regional level. Will local areas compete for regional support or will the priorities be agreed at regional levels prior to local area work being undertaken?

Question 6:

We want to ensure effective monitoring and evaluation of regeneration activities; will the approach set out achieve this?

We agree that an effective monitoring and evaluation process should be embedded into both the Regeneration Framework and into all activities that are delivered within it at the stage of inception. Using an RBA approach is helpful in providing the consistency now becoming embedded in other programmes such as Communities First, and especially for Wrexham Council as we have adopted this system for measuring the impact of the Council's Economic Prosperity Strategy (which essentially describes the same outcomes as those within this Regeneration Framework). We would however emphasise here the importance of investing in a robust and consistent data collection system across Wales to ensure effective and comparable measures of success.

11. Carol Smith, Project Manager

Having been involved with grant programmes for 12 years with mixed success, my comments relate to my experience rather than the questions specifically.

Delivery to Date

The Strategic Regeneration Areas which have operated/are operating tend to focus funding in small areas, leaving the remaining parts of the country without any means of providing public funding - this has proved difficult where reliance on the former Town Improvement Grants, for example, underpinned Townscape Heritage Initiatives, and which, when withdrawn, reduced anticipated budgets significantly. As the SRA funding (as with many such schemes) is offered for a fixed term, and building up momentum in the early stages is always difficult, there is a tendency to go for quick wins or easy projects initially to ensure expenditure, but these do not necessarily provide the most valuable, necessary or desired outcomes. Similarly, at the end, projects can be rushed through or not considered due to lack of time and resources.

It is essential to identify the problems and long term solutions before embarking on projects that cure the symptom but not the disease - this is acknowledged later in the document. For example, improvement of sub-standard housing stock and removal of HMOs, which may be seen as the most urgent need to regenerate a deprived area, cannot be carried out in isolation without addressing issues such as education and employment opportunities, meeting the needs of existing residents, and the provision of means to prevent the area reverting once the scheme has ended.

The expectation that leverage of other income should be maximised can determine the priority of projects, and more useful or necessary projects may be sidelined if they cannot attract such levels of match funding, especially if outcomes are measured in terms of inward investment. My experience of small third party repair/improvement projects shows that private funding has been slashed since 2008 because banks have become extremely risk-averse, and now refuse to lend on projects even if a substantial percentage of the costs will be grant-aided. Other loan facilities may not be available to these small private projects, although a number of these grouped together can have a real impact on appearance, physical condition and economic activity; the loss of some of the other grant schemes previously available, such as Town Improvement Grants, or reduction in budgets towards ones such as the Townscape Heritage Initiatives, has limited the availability of funding for these small private projects.

12. Welsh Nursing and Midwifery Council

The Welsh Nursing and Midwifery Committee are a statutory advisory committee whose main task is to provide expert professional advice to Welsh Ministers and Welsh Government officials on all matters relating to the Nursing and Midwifery profession. The committee has reviewed the consultation document and although there are no specific nursing or midwifery issues the committee would be supportive of the proposals as set out in the consultation document.

13. Mark Barry

I would like to offer some comments re: the Cardiff LDP Consultation, in relation to where and how we might expand the city and enhance transport connectivity.

Economic Profile

Cardiff has a population, based on Census data for 2011, of 346,000 (13% higher than the 305,000 recorded in 2001) within a wider Cardiff City Region population of over 1.4 million. This population is expected to grow significantly over the next 25

years, especially in Cardiff², which the Welsh Government has projected to reach ~460,000 by 2033³. These figures have though been disputed; however, even using a growth trend from 2001-2011 of 13%, Cardiff's population would still increase by over 80,000 in the next 20 years. The reality is that there will continue to be, considerable population growth in Cardiff. A key consideration for the LDP, aside from providing effective transport options for existing communities, is to ensure that any new housing developments include adequate transport links to places of work, education, leisure, etc.

1 ONS/WG 2011 Census Data

2 ONS/ Welsh Government 2009 Population Projections for Welsh local authorities.

3 ONS/WG 2008 based Population projections to 2033

4 Regional, sub-regional and local Gross Value Added 2010 Date: 14 December 2011

5 Regional Economic & Labour Market Profile – South East Wales – November 2012

SB 113/2012 29 November 2012

In parallel with population growth, according to Stats Wales, to 2011 there was an increase of over 30,000 in Cardiff's workplace employment, or about 17%, from the ~180,000 in 2001. This is over 80% of the net total increase for all of SE Wales. This is reflected in the GVA/Capita of Cardiff and the Vale which, at 104% of the UK average, is clearly some way ahead of many valley communities where a GVA/head of ~60% of the UK average is more typical.

However, we must also be cognisant of the fact that in UK terms, Cardiff's GVA/capita Vs. UK average still falls a long way behind places like Belfast (149.1), Nottingham (125.8) Edinburgh (174.8) and Bristol (126.1)⁴. Cardiff's GDHI is also low in UK terms at only 91% of the UK average⁵. In fact when compared to other parts of the UK it seems the major economic challenge for SE Wales is as much to do with Cardiff's underperformance when compared to leading towns/cities of the other regions of the UK (See Figure 1) as it is to do with economic inactivity in some Valley communities.

Recent Planning History

Over the last 10 years Cardiff planning policy has restricted developments of family houses in the city and instead encouraged the development of one/two bedroom flats, mainly around the bay. This lack of supply for family homes has distorted the market and increased the price of such houses putting them even further out of reach of young families. The intention of persuading developers to build more family homes out of Cardiff (which they have done to a small degree) has backfired to some extent as developers, because of the higher prices in Cardiff, now actually only want to build major new developments in Cardiff!

As regards apartments, too often, we have seen developers “throw up” poorly designed, gated, developments completely unsuited to family living and without any consideration of mixed use or integrating with the existing community. These add nothing to the urban grain and create ghettos for the future as the initial value of these developments falls away.

All this leaves us with a challenge

It seems to me that planning in Cardiff has been stymied in recent years – not helped by developers lack of imagination, delays with the LDP and the lack of a mechanism able to address strategic issues like transport and housing at a truly city region level. I am a supporter of the South Wales Metro concept, a city region approach and actively campaigned for Valley Lines Electrification (VLE). However, these projects will have an impact in the 2020s and not in the next 8 years. Cardiff cannot wait for a regional transport network to allow housing demand to be more regionally shared with neighbouring authorities. It has to act now.

Unavoidably, Cardiff is going to have to support well over 50,000 more people in the next 10~15 years and yes some will be in new family houses in NW and N/NE Cardiff. However, some families could be accommodated in well-designed, mixed use, apartment developments in central Cardiff.

City Centre Living

Cardiff, like most UK cities, is not densely populated when compared to many European cities that seem to have mastered the ability to build city centre family apartments. We need to challenge house builders, housing associations and developers to learn from Europe where city centres have strong urban patterns, high populations with building heights typically of 4-10 stories, which provides the critical mass population for mixed-use activity in the ground floor. 6

6 <http://m.theatlanticcities.com/design/2012/11/6-ideas-every-city-should-steal-barcelona/3998/>

7 <http://www.theatlanticcities.com/jobs-and-economy/2012/11/cities-denser-cores-do-better/3911/>

There is clear evidence that higher density cities deliver clear economic advantages⁷. It is less costly to deliver public services and the greater proximity and interaction between the resident population and its workers leads to agglomerative economic activity. This approach also reduces the impact of greenfield development at the edge of the city.

Principles for Urban Development in Cardiff

Therefore, I propose that some “European” principles for urban city development are applied in central Cardiff (including Roath, Adamsdown, Cathays, Butetown, Canton and Grangetown). These would include:

□ Residential densities to increase to levels more akin the centre of major European cities

□ All central flat/apartment based Cardiff residential development should typically be in buildings of 4-10 stories and provide sufficient size for family living (heights to reflect local narrative)

Building Up and Moving Cardiff A response to the Cardiff LDP Consultation, On-line submission as "barrymd" Mark Barry, 14 Boverton St CF23 5ES, December 2nd 2012, Version 1.0

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□ Ground floors to be set aside, where appropriate, for other uses to create a truly mixed-use environment

□ All buildings set on street front and not set back or hidden behind gates or car parks

□ Any car parking to be at the rear or underneath developments

□ Developments to include public spaces in scale with surrounding buildings

Applying these principles to regeneration in Central Cardiff

It is no secret that the current configuration of Lloyd George Avenue (LGA) is a design disaster. The original concept was for buildings of at least six stories supporting mixed use, combined with the removal of the heavy rail. However, we ended up with a compromise of a "motorway" and an old rail line separating a low-density housing development from Butetown.

A combination of transport solutions and the adoption of European style mixed use city living could facilitate the removal of the Bute Street rail embankment (by re-routing using light rail down one of the LGA carriageways, Canal Park or Dumballs Rd). This offers the prospect of high quality, high density, commercial and residential developments along part of LGA (which does not need two road carriageways) and help integrate Butetown into the fabric of the city. *I set out some ideas along these lines in the 2011 "A Metro for Wales' Capital City Region" report. (See Figure 2)*

Figure 2 - Illustrative Masterplan for Cardiff EZ and Butetown

The development of the Enterprise Zone and Conference/Convention centre should be included in a Masterplan to cover the area between Cardiff Central and the Bay and from the river to the Bute East dock. It will embrace the above principles in block/grid street patterns, some new north to south and east to west routes, active street frontages, building heights of four to ten storeys, and generally a mixed urban pattern including affordable housing. The objective should be to create the look and feel of urban centres of leading European cities such as Amsterdam and Barcelona.

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Transport Opportunities

Cardiff's transport network was designed for a city with less than 300,000 people; it now needs to plan and develop a network for one with more than 400,000 at the heart of a city region of 1.4M.

With valley lines electrification and the maturity of technologies such as tram-train, a range of previously unrealistic options are now available to the city. With VLE as the backbone of the South Wales Metro, the local Cardiff rail network can be enhanced to provide higher quality and more frequent services and begin address the issue of poor rail connectivity for the east of the city and down to Cardiff Bay. Rail can also support plans for 40,000 new dwellings, Commercial development and Park & Ride - especially at places like St Mellons, Waterhall and J33/Creigiau. New/enhanced stations in Cardiff (eg Ely Bridge, Crwys Rd, St Mellons, Splott, Rover Way, Waterhall) can all be used to encourage regeneration and facilitate more "urban" and denser mixed-use development.

The recently published "Planning Policy Wales"⁸ as regards Transport included the following statements, which are relevant to Cardiff's LDP:

⁸ Planning Policy Wales, November 2012, Chapter 8

...Near major public transport interchanges in city, town and district centres, planning authorities should allocate available sites for uses that maximise the accessibility potential of the site, including high density residential development, employment, shopping and leisure uses. Local authorities should identify in development plans and RTPs the need for additional interchange sites and improvements to existing interchanges....

Development plans should also encourage higher density and mixed-use development near public transport nodes, or near corridors well served by public transport

Given this policy, some of the primary transport led regeneration opportunities include:

Cardiff Crossrail

By adopting tram-train technology and leveraging the electrification of the valley lines, Cardiff can develop its own 4tph Crossrail system – east/west and north/south. (See *Figure 3*)

E-W: This would see a service from St Mellons in the east (using the relief lines) out to J33/Creigiau using the City Line and extending along the old line from Fairwater.

N-S: This would see the Coryton line link to a new light rail line to the bay from Queen St and Cardiff Central

The E-W and N-S Crossrail lines would interchange at Callaghan Sq. ensuring services from peripheral locations (St Mellons, J33/Creigiau & Coryton) can access Cardiff Bay

Key stations on the Crossrail network will provide interchange with local bus and valley lines rail services

These are all proposals that can realistically be developed and implemented once the electrification of the valley lines is complete by 2019/2020 – so in the latter half of the LDP period to 2026. In the period to 2020, Bus Rapid Transit (BRT) solutions will be more practical.

Cardiff Central Transport Hub

It will also be necessary to implement a major upgrade of Cardiff Central station so that it becomes a “gateway” to Cardiff, the wider city region and Wales. By 2022, VLE will generate above trend flows on the valley lines and the new IEP services to London, combined with a westward rail link to Heathrow, will increase patronage on the GWML. Cardiff Central will therefore need to be reconfigured and upgraded to handle >20M entries/exits per year (vs ~11.5M in 2011) and provide a 21st Century, multi modal interchange that integrates intercity services, valley lines, tram-train, BRT, coach, local bus, river bus, pedestrians, taxis and cyclist. *Building Up and Moving Cardiff* A response to the Cardiff LDP Consultation, *On-line submission as “barrymd” Mark Barry, 14 Boverton St CF23 5ES, December 2nd 2012, Version 1.0* MBarry_Cardiff LDP Submission V1.0.docx Page 5 02/12/2012

The current proposals presented by NR as part of CASR do not seem sufficient to address the above demand or deliver the high quality and strategic gateway the city needs. Cardiff Central is often the first part of Cardiff an inward investor sees. I have personal experience of the bad impression the current facility presents to those from outside the region arriving by train in the city.

Figure 3 - Potential Cardiff Crossrail....

☐ Regeneration/Increased Commercial Activity in/around Crwys Rd Station

A new station on the N-S Cardiff Crossrail would enable further denser development in/around City Rd/Crwys Rd/Albany Rd and connect this growing part of Cardiff to the regional transport network. The retail offer in the area would also be stimulated by increasing its regional catchment area.

☐ Development at Rover Way Station

On the E-W Crossrail, a new station at Rover Way could serve the residential areas south of the railway, provide an interchange to bus services and more importantly, enable more mixed use and denser development in/around Newport Rd retail park (which is currently dominated by 6 lanes of traffic and car parks separating "shed" based retail).

☐ Enhance Development at Ely Bridge

Public transport access to the new Ely Bridge development can be significantly enhanced by the development of new station on the E-W Crossrail line. This can also better connect Victoria Park. Consideration of even higher densities could then be considered for Ely Bridge? *Building Up and Moving Cardiff A response to the Cardiff LDP Consultation, On-line submission as "barrymd" Mark Barry, 14 Boverton St CF23 5ES, December 2nd 2012, Version 1.0*

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The proposals for >10,000 houses from Waterhall and out to J33 & Creigiau can only proceed once public transport to this part of Cardiff is significantly improved. The E-W Crossrail proposal does this and will also enable P&R and commercial development at J33.

☐ Enable Development at St Mellons

In the same way as J33, a rail station at St Mellons will underpin further commercial development at St Mellons business park, provide a location for a park and ride and improve public transport connectivity to the St Mellons estate.

☐ Park & Ride at J32/Coryton

An extension of the current Coryton line to J32 could serve a park and ride and provide vastly improved public transport access to Forest Farm and Green Meadow Springs business parks.

☐ Connecting Cardiff Bay and City Centre

Finally, a high quality link between the city centre and the bay can be realised. Tram-train and the conversion of the City and Coryton line can be linked to a re-aligned route to the bay that links Cardiff Central, Queen St and penetrates the Cardiff bay area more effectively than the current Butetown station. The routing of the line (see options in *Figure 2 - Illustrative Masterplan for Cardiff EZ and Butetown*) could also link/connect Dumballs Rd, Butetown estate and the final chosen location for a

Conference/Convention centre. It may be possible to progress this component of the “Cardiff Crossrail” as a pilot and in advance of VLE.

The scale of these transport proposals is significant and require £000Ms of investment to deliver. However, when one considers that 40,000 new homes in Cardiff could secure a sales value of £6Bn (at £150k per residence) then it would not appear unreasonable or unrealistic to secure a proportion of this value to contribute to the overall costs of these transport proposals. Exploring other innovative funding mechanisms (eg road pricing) alongside more traditional sources, then over a period of 10-15 years this network could be delivered.

To Conclude

In my view, the LDP provides an opportunity for Cardiff.

We can and have to, build modern homes on some greenfield land, but in a way that is sensitive to the environment and supportive of sustainable, connected communities. The proposed Ely Bridge development shows what current planning/thinking can achieve.

We also have to develop the centre of Cardiff and encourage more family city living to provide a greater concentration of people nearer existing/new services and transport nodes to help create a more European style cityscape.

We can also use a radical enhancement of the rail network using tram-train technology, to provide the foundation for the development of a modern rapid transit network for Cardiff and the wider region. This network can direct/enable future development/economic regeneration and help increase the density of the existing cityscape.

14. Kinmel Bay Church Board of Trustees

WELSH GOVERNMENT CONSULTATION DOCUMENT

Vibrant & Viable Places - New Regeneration Framework

We understand from local elected members that though your deadline of 14 January makes full local consultation on the above topic impractical you are happy to consider incoming letters, to which end we hope that the following paragraphs may be helpful. This Church sees itself as one of several foci for a ‘vibrant and viable’ Kinmel Bay. Other locations would include the Infant & Junior Schools, Y Morfa Leisure Centre, Tir Llwyd Industrial Estate, the Community Resource Centre & Library complex, the Medical Centre, and ASDA supermarket.

On reading your consultation document we were encouraged by your vision that *everybody in Wales should live in vibrant, viable and sustainable communities*, by your emphasis on partnership and by your recognition of the role the Third Sector can play, particularly the importance of their social capital and their closeness to local communities. We were also impressed with the bottom-up approach and the desire to be people-based as well as place-based. Can we encourage you to maintain your intention to involve local people in regenerative planning in the future?

One massive concern of local (= Kinmel Bay & Towyn) people is the community blight driven by anxiety over flooding (marine and/or riverine). A combination of problems such as difficulty in obtaining property insurance and planning restrictions of various types drives these fears and concerns and it is vitally important that local residents believe that local and Assembly governments have not abandoned them. By overcoming the challenges and providing initiatives and facilities to establish flood-resilience as a permanent feature of our community the health and well-being of Kinmel Bay will improve, and Kinmel Bay Church believes it has a central role in holistically providing a focus for such well-being. Certainly, a community discouraged

from first making itself viably and safely habitable seems unlikely to be motivated to succeed in becoming truly vibrant!

This Church has been involved with the Morfa Rhuddlan Flood Partnership for the past three years, and sees itself as potentially having a helpful role in facilitating communication between the local authority and the community at large concerning such matters as flood warning responses and resilience - ultimately involving facing up to the serious underlying coastal risks for such a low-lying area, rather than hiding away from them. /over.

2. One of the issues that has cropped up repeatedly in both local community discussions and at the Flood Partnership is the need to adopt the two storey principle, and the need for designated two-storey refuges for the vulnerable. The potential for disaster if this principle is not embraced was highlighted recently in the St Asaph floods when a frail old lady who might, at the warning stage, have agreed to move to a local 'safe refuge' had it been available, appears instead to have been fatally trapped in her bungalow. As the Church has recently put its own two-storey extension plans into the planning system, and as its position on St Asaph Avenue is a very strategic one, it would seem useful to use this opportunity to moot the idea of offering it up as a potential two-storey refuge for the vulnerable. (Perhaps via the Welsh Government's 'Pathfinder' Programme.)

Such a suggestion assumes that, from a Welsh Government and local authority position, coastal communities' adaptation needs could and should be looked at actively as part of the wider climate change solution, rather than as a problem that is easier to keep in the 'too difficult to deal with' file. (qv Wales Audit Office Report 2009 quoted in North Wales Weekly News 29th Oct. 2009)

We note that the terms of the Coastal Communities Fund assume that local authorities will work in partnership with leading community agencies (such as ourselves) to try to work towards solutions to climate change adaptation, rather than shy away from them, and two-storey refuges seem to be one obvious solution to this adaptation, thus improving community viability and vibrancy. However, there needs to be 'official sanction' of such community refuges and serious authority-led discussion with other players in the community which could provide similar structures.

In addition to having an upper floor, such refuges could perhaps store flat-bottomed boats in either collapsible or stackable form. Learning to use such boats from time to time as an emergency drill that doubles as a supervised pleasure activity could be a welcome challenge for younger members of the church and community.

We trust this response - ideally alongside those from Kinmel Bay's other community foci, and those of our neighbouring towns - will help you propose positive ways forward to the very real blight we experience, based on practical projects which recognise that our coastal communities are living entities that do not want to be just left behind and swamped.

..... [Rev. Gwyn Parry. Minister]

..... [Dr. Eric Coulton. Chair of Trustees]

15. Caerphilly County Borough Council

Vibrant & Viable Places – A Regeneration Framework
Consultation by Welsh Government

The definition of Regeneration contained within Section 4 of the document is appropriate.

The overall vision in terms of regeneration should address or make reference to the quality of life as a lasting improvement or legacy of regeneration as this is a key economic driver for attracting new investment in terms of people and jobs into Wales.

Section 3 What has changed and where are we now?

Q What is your feedback on lessons learnt from delivery to date?

It is encouraging to note what has worked well, as well as an honest assessment of what has not worked well, in particular recognising the limitations of the existing approach to regeneration.

There needs to be greater emphasis on continuity of programmes and initiatives to be identified in the proposed business plan and less restrictions on programme delivery in a financial year. In addition boundaries need to reflect economic geographies. This should help with a regional approach to regeneration. Development opportunities missed by narrow spatial targeting in deprived areas only. Perhaps a package of proposals that cumulatively would have a more significant impact might be the way forward, for example complimentary regeneration schemes within development corridors along public transport routes.

There should be sufficient flexibility to allow grant programmes to work together across themes and geographic areas.

It is reassuring to see that WG recognise that there is no diminished need to invest as problems have not been overcome. Generally the targeting of the current system is felt to meet priorities. Care needs to be taken if moving away from the existing model. In some cases it is felt that an intermediate party has been brought in to administer part programmes, eg cycleways when it may have been more appropriate for Local Authorities or WG to undertake the role.

It should be recognised that there are significant costs associated with monitoring, particularly over the longer term, which are not met through current programmes. It should be recognised that many outcomes will take many years to come to fruition and this time scale should be considered. Monitoring outputs should reflect this. The long term objective is to achieve sustainable communities and this takes time so short term targets are not necessarily appropriate.

Q Should other national outcomes or principles be considered?

The following changes to the national outcomes are suggested:

National outcome 1 Prosperous Communities

Consider including:

Provision of appropriate land for development within Adopted Local Development Plans to accommodate sustainable levels of population and employment growth.

There should be recognition that having a very good and accessible natural environment is a significant factor in encouraging investment.

Consider amending:

Well-connected communities supported by excellent integrated public transport systems and superfast broadband connections to form the bedrock of the City-Region approach.

Consider including

A high quality, well maintained, transportation network that serves the needs of business, industry and the economic needs of the Country.

Outcome 2

Consider including

Engender a better understanding of heritage, appreciation of local culture and the urban and natural environment

National outcome 3 Healthier communities

Consider including:

Well planned, accessible open space and accessible natural green space.

Should make reference to the Come Outside Model being developed by CCW, which is a multi agency approach aimed at tackling health issues by encouraging communities to use their local accessible open space and natural environment / green space for activities which improve health and well being. This also has the effect of increasing understanding and appreciation of green areas and local heritage.

Section 5 Key Principles - Strategy

Partnership – Whilst seeking innovation it should be recognised that good working and established models exist and there is no need to reinvent the wheel in many cases.

Spatial Planning

The recognition that spatial planning should be a major element in terms of the approach to planning and investment at the national, regional and local levels is welcomed. It has long been recognised by the Council that sound spatial planning provides certainty for investment decisions and thus inward investment and is therefore a pre-requisite for investment and sustainable development.

With regard to added value, this can be the key as to what proves successful or indeed even gets out of the blocks. It should be recognised that value is far more than monetary issues and the value of programmes that contribute to improvements to the environment should not be underestimated.

Further the WG should more fully identify the strategic role they play in determining/moulding grant programmes and settlements both internally and beyond Wales eg EU.

5.2.iii Sustainability

The suggestion that the current short-term approach to regeneration investment should be replaced by a longer term ‘regeneration business plan’ is supported. The move towards 10-15 year cycles is applauded.

Delete the following bullet point:

“Enable investment and delivery by private and voluntary sectors rather than inadvertently creating barriers through public sector intervention.”

Consider replacing with:

‘Public sector intervention should enable investment and delivery by the private and voluntary sectors and avoid inadvertently creating unnecessary barriers’

Supportive of long term initiatives as this is often what the environment requires. WG should seek to include establishment/maintenance costs for projects within which they have invested so as to secure longevity of schemes and encourage good schemes to come forward.

Section 6 Joined up Delivery

The private sector should be encouraged to include social clauses within their own procurement processes in order to provide work for local people. This could be further encouraged where private sector initiatives are in part reliant on grant aid. This requirement could form part of the sustainability appraisal that is contained within the Design & Access Statement that accompanies new development schemes.

Q What more can be done to achieve greater coherence and cross cutting action across departments?

6.1i – could introduce a sentence on Meanwhile Uses.

6.1.iii) Public Sector – amend to include:

‘It is recognised that the public sector will always have a strong role to play, particularly in areas that the other sectors maybe unwilling to provide or indeed where it may not be in the wider public interest for them to do so.’

6.1.iv Housing Regeneration & Heritage

The power of social procurement and the role of housing regeneration in some of the most disadvantaged communities is recognised in terms of its potential impact on the community as a whole. This is an important concept and one that the Council recognises in its own regeneration work, particularly in relation to the current WHQS work streams and ongoing Renewal Area programmes.

The new regeneration framework encourages people to think a little differently about heritage so that its potential can be harnessed. The use of heritage as a regenerative concept is very much supported and utilising good examples such as Hanbury Chapel in Bargoed and the Newbridge Memo as exemplars can serve to demonstrate what can be achieved through this process. Heritage is much more than the built environment it also encompasses the natural environment, which has been shaped and is being shaped by human activities. A better appreciation of our natural heritage can help in overcoming a lot of anti social activities and engender support for those who manage the accessible natural green space. The natural environment can play a major part in regeneration.

It is important to encourage and acknowledge the reuse of heritage assets to secure their longevity. It is interesting that VAT is payable on restoration projects, this should be reconsidered.

6.1.v Other Government areas:

A general point is that greater coherence can only be achieved by collaboration, communication and partnership. There also needs to be a recognition that innovative proposals can be risky.

Business Rates

It is imperative that the Welsh Government review the business rates policies in Wales to help stimulate investment on our industrial estates and also importantly as a package of measures designed to stimulate investment in our towns and villages which are under attack from out of town retailers and the internet. It is also important that existing properties are re-evaluated as a matter of urgency to provide a more realistic valuation that reflects the current economic climate.

Transport

The importance of affordable, accessible and frequent public transport cannot be over-estimated when consideration is given to the availability and accessibility of employment to people from deprived areas. The Welsh Government should actively consider the merits of the South Wales Metro Strategy and take a long-term policy decision to support transport interventions, which deliver economic growth across the region.

A long term view should be taken to make provisions to enable LA's to secure the necessary land bank to implement workable schemes e.g. the use of disused railways.

Education and Skills

Greater emphasis should be placed on aligning the education system to meet the requirements of business, enterprise and industry. In addition more emphasis should be given to the provision of vocational qualifications that provide people with the skills and knowledge necessary to enter into the workforce. There needs to be recognition that tradesmen and tradeswomen are crucial to our economy and a re-emphasis on ensuring that people leave the education system with a high quality of basic essential skills, particularly in terms of literacy, numeracy and IT. It should be recognised that maintaining and managing the urban and natural environment offers a wide range of training opportunities.

Whilst it is possible to support and assist those digitally excluded with skills and equipment, there is a huge divide in communities in respect of the affordability of broadband. Families that live in poverty cannot afford broadband even when it is available, creating a significant divide between them and their peers. This needs to be addressed if we are to close the educational attainment gap.

Tackling Poverty Action Plan

The importance of affordable, accessible, childcare provision should be given greater consideration in initiatives to tackle poverty. The ability to access employment opportunities can be severely reduced and indeed prevented if affordable childcare is not available for those who need it.

Environment

The Local Development Plan (LDP) is the statutory framework for the development and use of land, it seeks to reconcile the development needs of the population with the wider environmental concerns for the conservation of the manmade and natural environment. The LDP also aims to ensure that the most efficient use is made of limited land resources whilst at the same time stimulating the local economy for the benefit of present and future generations.

The Rural Development Plan and the local authority play an important part in the wider protection and regeneration of the environment, and are very important mechanisms for delivering Welsh Government's objectives in terms of rural development and sustaining rural communities. There is a need to ensure that there is continuity between the current RDP round and that proposed for 2015.

It should be clear that we need to protect the quality environment that we have and also make better use of it.

Whilst agreeing that in some cases grants should be developed in conjunction with others it should not be viewed as a pre requisite, particularly in environmental terms.

The same should be said for all programmes if this were the case.

Again, too much emphasis is placed on urban rather than the wider environment.

The quality of landscape and what it contains, particularly in supporting well being, is what is important as well as the issues identified.

Health

The importance of free access to natural and open green space and play facilities (both formal and informal) should be recognised here. Such areas are coming under increasing pressure as a consequence of the current austerity measures being imposed on local authorities and other public bodies. Increasingly land is either being sold off in order to realise capital receipts, or transferred to other organisations to manage, in order to reduce the cost burden to the public purse. As a consequence, access to natural and open space is increasingly being reduced. This in turn could have unintended consequences on the health and well being of the community.

It is also the case that the quality of natural and open green space and play facilities have a positive impact on the quality of life of an area, both in terms of their value as leisure and recreation facilities, but also importantly for their intrinsic value. The quality of life in an area is often an important consideration when companies are determining in which areas to invest.

There are many ways in which regeneration policy can contribute to the retention and creation of such valued spaces, and this will in turn have a positive impact on the environment as a whole and importantly on the mental and physical health of the population.

The NHS needs to be more proactive in taking action to tackle the causes of illness instead of reacting and treating the illness. Accessing the natural environment has proven health benefits, enabling and encouraging access is fairly low cost.

Community Benefits in Procurement.

Buy for Wales often works against the use of small local businesses whose involvement in local regeneration could help to directly stimulate the local economy.

Q Do you agree with the national, regional and local approach set out?

Greater clarity needed in terms of 'top down and bottom up' interventions.

Bottom up is working successfully as evidenced through Rural Development Plan initiatives as it encourages a greater 'buy in' by the communities we are trying to regenerate. Too much of a strategic approach could well alienate the people we are trying to help.

6.3 Key approaches for the Regeneration Framework

The new regeneration model, which recognises the importance of people, place and evidence, is welcomed.

In terms of other government areas in the regeneration framework, there needs to be recognition of the role that Local Authorities play in helping local businesses. There are a number of local economic development initiatives that are specifically aimed at helping local businesses which form an integral part of any regeneration strategy.

The main problem is trying to square the circle in terms of 'top down - bottom up' approaches to regeneration. The danger is that regeneration will become too regionalised with the emphasis on City Regions with the inherent danger that the Valleys will become Cardiff Centric with the introduction of City Regions. This will then eliminate the opportunity of local solutions to local problems that politically we are forced to address.

The current European Convergence Programme is very much focused on strategic initiatives, which preclude against local interventions that have tangible results in terms of outcomes of physical economic and social improvements. It appears that the new frameworks evidence based approach to investment having the greatest impact could be moving in the same direction.

Whilst rhetoric reflects a local agenda concern is expressed that this will not be the case. The ability to determine priorities and activities at a local level should not be overly constrained by the superstructure from above. Flexibility is needed for local distinctiveness.

Finally it would be interesting if more detail could have been given to how the Rural Development Plan could form part of the Regeneration process bearing in mind the lack of continuity between 2013 and 2015.

There is a need to recognise that it is not just the settlements but also their settings, which are key to regeneration. This is particularly true in the South Wales Valleys

where the urban fringe and close countryside forms the infrastructure to support the communities themselves. This in its own right brings problems and these should be recognised.

6.3.iii) line 3 should read 'settlements and their setting'

6.3.iii) para 1 final sentence – remove final sentence/

6.4 Governance structure

National

A new Ministerial Advisory Panel is proposed to advise, scrutinise and comment on proposals generated at the regional level. This is a framework for certainty and transparency that was previously lacking and is to be welcomed. However care will need to be taken to ensure that that decision making is not slowed down unnecessarily as a result of overly bureaucratic reporting procedures.

Regional

There seems to be a very real willingness to join up all of the key players in the region to achieve better outcomes for our communities in terms of the economy, but also for social and environmental reasons. However, there is a very real danger that various regional groups/boards with overlapping remits will be set up which will result in duplication of effort, inefficiency and poor outcomes.

The New Regeneration Framework (October 2012) proposes that: “regional regeneration boards are set up to provide oversight, planning and policy for the area and advise on how indicative funding could be spent....” . This is notwithstanding the fact that the City Region Report (July 2012) recommends that: “an over-arching city region strategic planning tier to ensure city region hinterlands benefit from the growth of their cities and have a voice in cross-boundary development. This should provide a clear hierarchy of decision making as in Scotland.”

Separately the planning Independent Advisory Group Report (June 2012) recommends that:

“Recommendations 8-11

8. The Planning Bill provides a statutory framework to enable the introduction of strategic planning.
9. The Welsh Government consults on the areas where strategic planning is required and the details of a statutory framework for plan making to ensure it is fit for purpose in Wales.
10. The Welsh Government puts in place a national support structure to ensure delivery of the proposed regional strategic planning arrangements.
11. The Welsh Government encourages voluntary strategic planning arrangements in advance of any legislative changes, using tools available across all Government departments to ensure such work is democratic, consistent, accountable, transparent and inclusive.”

The planning system is a delivery mechanism with application across several Ministerial portfolios and if the Welsh Government is to realise its ambition to create conditions for growth and regeneration in current difficult economic circumstances, it is vital that co-ordination of initiatives and investment takes place at the highest level of Government. The WG is therefore urged to outline clear governance arrangements to deliver on the recommendations of all three reports that avoids duplication, provides transparency, accountability and consistency and provides the framework for the work streams necessary to deliver on Government Objectives for the region.

Local

The above structures should have strong regard to the local context.

Recognition that the local authority is critical to the delivery of successful regeneration initiatives on the ground is welcomed.

Local should also include reference to the need that to have sustainable communities there must be a strong emphasis on the 'bottom up' approach so that there is sufficient ownership.

Q Do you have any comments on our proposals for how we will target and direct our funding?

6.5.i Our proposals for directing targeted funding

It is proposed that indicative funding allocations are made to the three regions on a formula basis. Local Authorities should be consulted on the proposed formula in due course. However the move away from selecting places towards concentrating on areas of opportunity is welcomed.

The 5 case business model advocated in the report is time consuming, difficult for officers to understand let alone master and adds another layer of unnecessary bureaucracy.

The bullet point on supporting interventions should include the environment. The proposed model may limit local intervention on the ground, and the type of funding those local authorities and their partners can lever in.

Evidence, mapping & business cases

Local authorities are continually gathering large amounts of information and intelligence about their areas. Along with other available evidence this is fed into detailed forward planning, linked to the requirements to prepare Single Integrated Plans and Local Development Plans covering their entire areas. Any further work should draw from and build on existing baseline evidence and should supplement this to provide evidence to fill any relevant data gaps. Some of this work can be achieved at the regional level whilst other data will be more relevant to the local level.

Successful Places

The strategy should make provision for the provision of funding to enable the regeneration of brownfield sites in order to bring them back into beneficial use. This is particularly important for prominent sites within towns and villages where the redevelopment of those sites would serve to improve the physical attractiveness of the urban area but where the land values may not facilitate the redevelopment of the land due to issues of financial viability.

Investment.

Pleasing to note the recognition of additional funding for specific interventions particularly 'successful' places.

However the report then goes on to highlight the need for a holistic approach, which negates against genuine local interventions.

The environment should be identified as an individual point and identified as a stand alone issue along with the 7 shown. It is not sufficient to hide behind 'not limited to the following'. The examples are siloed. This may prove critical in terms of the alignment of funding.

Town Centre Management

Caerphilly County Borough Council operates the 'Unique Places' model of Town Centre Management in 4 of our principal town centres - Caerphilly, Blackwood, Bargoed and Risca (refer to attached document). Unique Places aims to focus existing council resources on the town centres at no additional charge to businesses, this makes this model of town centre management a viable alternative to the BIDs process as a way to manage small town centres. This model is deliverable in any town centre that a local authority is committed to support.

Jobs and growth are a key priority and any measure that seeks to create stronger local economies must be seriously considered. Enabling local authorities to retain a set proportion of the income they generate from business rates to fund town centre management schemes would go some way to providing the necessary resources to facilitate this work. It is also critical that Town Centres are regarded as Hubs for Enterprise.

Joint ESF and ERDF projects, will be particularly demanding to develop, manage and monitor, however the principle of this approach is welcomed.

Housing renewal funding should be used to tackle environmental and social problems and not just targeted at the built fabric. This also needs to look at the wider environment in which the 'successful places' sit.

Q We want to ensure effective monitoring and evaluation of regeneration activities, will the approach set out achieve this?

Project Evaluation

There is a sharper focus on programme evaluation so that activities can be measured. This is to be welcomed. Traditionally regeneration has been evaluated by describing the amount of money spent, rather than by a detailed consideration of the impact that the funding has created. A move toward more transparent programme evaluation will enable local authorities to demonstrate quantifiable benefits derived from investment decisions where it is practical to do so.

It must be noted that the positive impacts of projects often happen well after implementation is complete. This is particularly true of physical improvement schemes. Often it is immediate outputs that are measured rather than longer-term outcomes. Post-activity timescales should be extended to allow wider impacts to be measured.

Evaluation and monitoring needs to be proportionate, reasonable and costed into initiatives over the long term. Meaningful data can prove very expensive to gather in many cases. Care must be taken to ensure it does not work against some schemes. The sharing of data will also be of importance.

The development of a series of comparable indicators that can be used to monitor and evaluate change over time is crucial.

General points

The document needs to:

1. Offer a clear and specific strategy that can be easily understood by Members and the public with clear and specific outcomes;
2. Set clear strategic priorities that explain what will be achieved and how;

3. Clearly explain which matters are national, regional and local and provide an explanation in terms of the parties involved and the delivery mechanisms for the same (utilising existing structures where possible);
4. Explain how it links to other WG areas (e.g. WIIP, City Regions etc.);
5. Explain how the Strategy links together other key WG policy areas (e.g. sustainability) and what this means in terms of delivery;
6. Provide a clear action plan that illustrates what will be done, when and how;
7. Clearly outline the governance structures across all WG departments/initiatives and the capacity of local authorities to support this.
8. Explore the potential for rationalisation and collaboration at this level further;

Finally a review of the various funding sources should be undertaken to consider how these can best be pooled for greatest impact across Ministerial Portfolios.

16. Environment Agency Wales

Environment Agency Wales Response to Welsh Government Consultation
Vibrant & Viable Places: New Regeneration Framework (October 2012)

1.0 Introduction

1.1 The Environment Agency welcomes the opportunity to respond to the Welsh Government Vibrant & Viable Places: New Regeneration Framework consultation.

1.2 The Environment Agency is the principal environmental regulator in Wales and England, with a range of responsibilities including the protection of soil, air and water. Within the context of sustainable development, we have a lead role in the integrated protection and enhancement of natural resources, the management of waste, the management of flood risk, fisheries and water related conservation and recreation. We share the common vision of contributing to sustainable development and achieving a better quality of life.

1.3 Our comments on consultation proposals are based on the potential implications and opportunities for the environment in line with paragraph 1.2 above.

1.4 Our key comments are set out below, and our detailed response is attached in Annex 1.

2.0 Key Comments

- We are pleased that the proposed framework recognises that regeneration should reflect sustainable development as the Welsh Government's central organising principle.
- The proposed framework could better articulate the potential contribution from environmental regeneration, improvement and risk management towards sustainable economic and social regeneration, including multiple long-term benefits to communities.
- The Vision for, and definition of, regeneration should be amended to recognise the environment's contribution towards place-making and the regeneration process.
- The proposed national outcomes should better recognise opportunities to improve communities' resilience, for example to the impacts of climate change, and support the transition to a low carbon resource efficient economy.
- Environment Agency Wales can make an important contribution to regeneration by identifying environmental risks, for example flood risks, and

advising on how to integrate green infrastructure, such as water sustainable urban design and water related recreation and biodiversity elements, into schemes to mitigate impacts and achieve wider economic and social benefits.

Our detailed comments on are set out in Annex 1.

From 1st April 2013, the functions of Environment Agency Wales, alongside the functions of the Countryside Council for Wales and Forestry Commission Wales will be combined under Natural Resources Wales. As a new body with responsibilities to maintain, enhance and manage the sustainable use of Wales' natural resources, we look forward to work closely with Welsh Government and other potential partners to help deliver sustainable regeneration initiatives.

Chris Mills
Director Wales
Environment Agency Wales
21st December 2012

Annex 1

Q1. What is your feedback on lessons learnt from delivery to date?

From our involvement in regeneration initiatives we consider the following as common features in delivering successful schemes:

- strong strategic leadership where the people involved are committed to the outcomes agreed;
- operational delivery is supported or led by multi-agency teams or projects;
- funds are available to stimulate action; and
- best practice is sought and applied.

An example of where this approach has been applied successfully is the Valleys Regional Park Project.

However, in other cases we believe there has been a lack of recognition by regeneration scheme managers of how environmental improvement can support the delivery of regeneration aims and sustainable development outcomes have been missed. For example, a recent waterfront regeneration scheme in South Wales failed to recognise the good water quality of the area, and the potential for maximising water recreation opportunities. An opportunity to incorporate surface water run-off management into planned initiatives to improve the urban townscape was also missed by not effectively engaging with relevant stakeholders.

Environmental constraints and opportunities should be identified early in the regeneration process to help identify cost effective measures in delivering sustainable outcomes. As part of a recent scheme in North Wales, investment to reduce the risk of coastal erosion enabled improvements to be made to a promenade and the construction of a watersports centre. Collaborative working between different bodies also ensured that around £2 million cost savings was achieved.

We note the recognition that rural settlements are experiencing acute problems which require bespoke programmes to address these. We welcome the intention therefore to do more to integrate activities across programmes for such areas, particularly in recognition of the high level of dependency on the CAP support mechanism in rural Wales. The Single Farm Payment itself currently accounts for around 80% of all farm income¹. Recognition of the economic and social value of ecosystem services

¹

delivered by land managers and rural communities, may form an important component of regeneration programmes for rural communities.

Recommendation: The review of the regeneration process should recognise and highlight the need to consider and identify environmental constraints and opportunities as part of any regeneration scheme. The natural resource management planning framework, as described in *Sustaining a Living Wales* (Welsh Government, January 2012), may help to identify environmental considerations for different locations. This would help identification of the most appropriate forms of regeneration activity for sites. Early engagement with relevant stakeholders, including Environment Agency Wales, can ensure that appropriate environmental opportunities inform the design of a scheme, to deliver social, environmental and economic benefits.

Q2. Should other national outcomes or principles be considered?

We generally welcome the community focus in the three strategic outcomes identified in the consultation document. The natural environment, and the services it provides, can make an important contribution towards the delivery of all three strategic outcomes, as well as underpinning the delivery of many of the social and economic supporting outcomes identified in the consultation document. For example green and blue infrastructure (e.g. woodlands, parks, ponds, lakes, rivers and canals) make an important contribution towards supporting healthier communities through the provision of recreational, and health and wellbeing opportunities as well as managing water and air quality. Various reports have also recognised the environment's valuable contribution to the economy, supporting jobs², as well as improving climate change resilience.

The regeneration process should therefore adopt an integrated approach where connections between environmental, social and economic outcomes are identified and implemented alongside each other to achieve synergistic benefits. We therefore welcome the clarification that the regeneration approach must reflect sustainable development as the Welsh Government's central organising principle.

We are concerned however, that, whilst there is reference to environmental decline and environmental objectives in the supporting text that expands on the terms used in the definition (p10), the important role of the environment in place-making and in the regeneration process is not clearly articulated within the Vision or Definition as currently drafted.

We believe the vision would be strengthened and better reflect sustainable development, if it included "and a high quality natural and built environment" at its end.

Whilst the definition of regeneration refers to seeking to reverse physical decline, there is no specific reflection of the social and economic benefits that can be achieved from managing environmental risk, and reversing decline in the local natural environment. For example regeneration which incorporates reversing heritage decline, or addressing a lack of access to high quality recreational or green spaces can contribute towards attaining health and wellbeing benefits. These provisions also require management and ongoing maintenance which could lend themselves to social enterprise or other employment opportunities.

We therefore believe that the definition would be strengthened by including a specific reference to the environment. We also believe that the definition would benefit by

clarifying that “lasting improvement” includes recognising and addressing environmental risks, and living within environmental limits.

Recommendation: The vision in the consultation document should be amended by inserting: “, and a high quality natural and built environment” at its end.

Recommendation: The definition for regeneration should be amended by:

- inserting “, environmental” after “social” so that it reads “an integrated set of activities that seek to reverse economic, social, physical and environmental decline...”; and
- inserting “whilst taking account of future risks and uncertainties” after “environmental decline”.

We also consider that additional supporting outcomes should be considered which reflect the multiple benefits that can be achieved by delivering environmental improvements as part of the regeneration process:

Outcome One: Prosperous Communities

(i) We consider that there should be an additional outcome for ensuring climate change resilience. It can be expected that climate change will have social and economic impacts. Regeneration can provide a unique opportunity to integrate measures that increase the resilience of communities against such impacts, for example flood risk.

Many existing Welsh towns and cities have historically evolved on floodplains by rivers or the sea. Many of those communities are currently at risk of flooding and we expect flood risk to increase as climate change influences rainfall patterns, leads to sea level rise and increased coastal erosion. Regeneration offers an important opportunity to address existing problems associated with flooding and help communities become more resilient against increased levels of flood risk as a result of climate change through appropriate masterplanning and building design. Reducing the risks from flooding can help maintain thriving communities and create attractive places for business investment.

(ii) We consider that there should also be a clear outcome in relation to resource efficiency. Maximising energy and water efficiency should inform the location, layout and design of any new development which forms part of a regeneration scheme. The integration of sustainable drainage systems (SUDS) into a regeneration scheme can reduce surface water run-off thereby minimising adverse impacts from heavy rainfall events. Where the rainwater is harvested on-site, it can be used for multiple uses, including household uses, which can reduce the demand for potable water and therefore reduce household water bills. Where SUDS are integrated into open and public spaces, they can reduce heat island effects, offer an amenity resource, enhance the attractiveness of the local environment and provide habitat for local wildlife. We are currently working with Valleys to Coast Housing Association and Dŵr Cymru Welsh Water to pilot a water sensitive urban design approach to improve household water efficiency and, address surface water and sewer flooding for a housing estate in Maesteg. An illustration of the site before and after is presented in the figure below:



(iii) We support the objective of ensuring well-connected communities. However, we consider that these should be supported by sustainable transport options, including intermodal options. There should therefore be a clear emphasis on improving the provision and access to sustainable transport modes.

(iv) We support the recognition of the need to improve levels of economic activity as a specific supporting outcome in delivering prosperous communities. However, we suggest that the outcome should also include an explicit focus on stimulating green jobs to support the transition to a low carbon, resource efficient sustainable economy.

Outcome Two: Learning Communities

We welcome the identified supporting outcomes. However, we believe there should be greater recognition of the various opportunities for learning and skills development in the outdoors which can be supported or stimulated as part of heritage regeneration. Regeneration also offers the opportunity to raise communities' awareness of the natural environment and the services it provides.

Outcome Three: Healthier Communities

We support the inclusion of an outcome relating to sustainable and quality local environment. However, we recommend that this outcome should also incorporate an objective to provide, protect and improve the accessibility of high quality green environments.

Recommendation: We recommend that the following should be considered as additional supporting outcomes in:

1. Delivering prosperous communities:

- Improving climate change resilience;
- Maximising resource efficiency; and
- Improving access to and the provision of sustainable transport modes.

2. Delivering healthy communities:

- improved access to natural green environments; and
- reduced incidents of environmental crime e.g. fly tipping.

Q3. What more can be done to achieve greater coherence and cross cutting action across departments?

We welcome the promotion of cross-cutting action to achieve targeted outcomes. Any integrated approach towards policy development should be based on a set of key principles of sustainable development, currently set out in the WG's SD Scheme One Planet: One Wales and any refinement set out through the proposed SD Bill. However it is not clear from the consultation document whether a policy integration process has, or will be adopted to reflect the need to achieve sustainable development.

The consultation document refers to a number of existing Welsh Government policies and programmes with which the new regeneration framework will be closely aligned. It will be important that these policies and programmes are based on sustainable development principles to ensure delivery of the strategic outcomes for regeneration. We have concerns however, that the new Communities First programme has no specific environmental element or indicators, and therefore seemingly fails to recognise the environment's potential contribution in achieving, prosperous, learning and healthier communities.

The consultation document also states that there will be close alignment with the Wales Infrastructure Investment Plan. Using environmental data and adopting the ecosystem approach will be key to ensure that investment is directed to locations that can be appropriate for the proposed type of activity or development.

It will be important to understand, if relying on existing plans, programmes and policies developed before this framework, whether there are any gaps in their ability to deliver multi-benefits and over the long term. This framework may then have to plug those gaps.

We also note that the consultation document does not include a reference to the Welsh Government's waste strategy for Wales, Towards Zero Waste (2010). We believe that this represents a missed opportunity. The strategy demonstrates how actions on resource efficiency can support the development of a sustainable, resource efficient economy through stimulating more high value 'green' jobs, and improving economic resilience against the rising costs of, and security of supply of material resources. In supporting sustainable communities, we should ensure that these communities are able to reuse and recycle the material resources available to them rather than discard materials in an unsustainable way.

It will also be important to understand the relationship and role of the proposed new independent sustainable development body as described in the Welsh Government's Sustainable Development Bill – White Paper (December 2012), in supporting delivery of this framework. The new SD Body will have an important role in supporting organisations to embed sustainable development as their central organising principle and facilitate joint working and collaboration within the public service and wider Welsh society.

Recommendation: There will be a need to develop and adopt an integrated policy approach that is based on sustainable development principles.

Recommendation: the framework should clarify the role and relationship of the proposed SD Body for Wales and delivery of this regeneration framework.

Q4. Do you agree with the national, regional and local approach set out?

We agree with that the regeneration process requires participation at the local, regional and national levels. We welcome the recognition that there will be a need to engage communities as part of any regeneration programme, and that the LDP

process offers an opportunity to inform and be informed by regeneration programmes. We support the recognition that certain issues may cross administrative boundaries and will therefore require collaboration at a regional or sub-regional level to ensure that regeneration activity is directed to the most appropriate location. We believe it will be essential to link regeneration to spatial planning. A national spatial planning framework (as recommended in Towards a Welsh Planning Act: Ensuring the Planning System Delivers (June 2012)) informed by the proposed Natural Resource Management Planning framework, would be key to help steer at national, regional and local levels where development proposals which form part regeneration can be appropriately located for current and future generations. We welcome the reference to some of these key emerging agendas in Section 3.3, but are unclear how they will be taken forward through the new regeneration framework.

The emergence of thinking around a city region approach to planning will be key to influencing the final regeneration framework. Wales needs to be clear what is appropriate to have where, taking account of future opportunities, risks and uncertainties, e.g. population growth, climate change, resource scarcity and fuel and food poverty. This may require some hard choices and tough decisions.

We also welcome the intention to develop a multi-agency approach. This should ensure that the knowledge and skills from different bodies are utilised in the regeneration process. As part of this approach, we recommend that the proposed regional boards should include representation from the three sectors required for sustainable development decision making and delivery: social, economic and environmental (the latter including expertise on natural resources/resource efficiency).

The Environment Agency and, in future, Natural Resources Wales can help identify flood risk and other environmental issues that should be considered as part of a regeneration scheme, including relevant legislative requirements. By involving us at an early stage in any regeneration scheme, we can advise on the environmental opportunities and risks that could affect the design and outcomes of a regeneration scheme. This can also avoid potentially costly delays later in the regeneration process.

Recommendation: The regeneration framework will need to be closely aligned with emerging national, regional, local spatial planning frameworks.

Recommendation: The proposed regional boards should have multi-agency and multi-sector representation to enable sustainable development decision making and delivery.

Q5. Do you have any comments on our proposals for how we will target and direct our funding?

As part of targeting investment into 'Successful Places' we consider that there should be a clear intention to deliver benefits for the long-term including improving communities' resilience to climate change impacts, in particular flood risk.

For example, EU funding should be used to support infrastructure provision including environmental infrastructure, such as flood risk management and sewerage infrastructure. Such investment can address potential limitations to development and regeneration and ensure schemes remain viable for the long-term.

Funding decisions should be based on robust environmental evidence to ensure the investment delivers benefits for current and future generations.

Environment Agency Wales has already undertaken extensive analysis of the future levels of flood risk to every major community in Wales, incorporating the potential

effects of rising sea levels and more intense rainfall events that are predicted as a result of climate change. We have also recently undertaken an analysis of the risk of coastal erosion to every coastal community in Wales. We can therefore provide advice to ensure that regeneration proposals will remain viable, and continue to deliver their socio-economic objectives in the long term.

The Natural Resources Management Planning Framework (NRMP) proposed in Sustaining a Living Wales (January 2012) could be used as an important and consistent evidence base to identify environmental constraints and opportunities which can inform decisions on regeneration activity and the location of new development. Whilst the status and nature of such a framework has yet to be defined, it could help ensure that investment in new infrastructure is based on a clear understanding of the environmental capacity of an area, whilst also identifying the type of infrastructure which should be protected or enhanced to support the delivery of regeneration goals. We therefore recommend that the emerging NRMP should be used to inform decisions on the location of new development that form part of regeneration schemes.

Regeneration schemes should also consider the whole-life costs of proposals, including the maintenance, environmental, and social costs for current residents and future generations from implementing a particular proposal.

Early engagement with utility providers will also be required to ensure that existing or planned infrastructure can accommodate a proposed regeneration scheme.

Recommendation: Funding for regeneration should reflect aspirations for the long-term including improving communities' resilience to climate change and other future risks.

Recommendation: Regeneration schemes should consider the whole-life costs of proposals, including the maintenance, environmental, and social costs for current residents and future generations from implementing a particular proposal.

Recommendation: The natural resources management planning framework (NRMP) should be used to inform future development which form part of regeneration initiatives.

Q6. We want to ensure effective monitoring and evaluation of regeneration activities, will the approach set out achieve this?

We generally welcome the proposal to monitor regeneration programmes by using a Results Based Accountability approach. The programme should also be aligned to monitor and report on its contribution to the wider sustainable development of Wales. The headline and supporting Indicators in the current SD Scheme: "One planet: One Wales" and any future reporting requirements under the SD Bill, should be incorporated into the monitoring and reporting of this framework.

17. Jayne Smith

Dear Sirs

Your aims are laudable. But until you give people the opportunity to get a real job - not the oversubsidised, grant-maintained, short-termism that Wales invests in then - regeneration in Wales is a laughable objective.

You should come to Pontypridd and my village Taffs Well, traditional Labour strongholds, to see the devastating manner in which Welsh Government money is spent by Rhondda Cynon Taf Council, Arriva Trains and the like:

Pontypridd Railway station no toilet facilities once staff have gone home

chewing gum and drainage problems on footpaths accessing the station rubbish on the pathways a lift that is not fit for human use gutters pouring water onto the platform after a so-called refurbishment by Contractors Murphy the town centre the demolition of the local outdoor swimming pool the lack of appropriate pedestrian access to the new Sainsburys store making it only viable for use using public transport and in Taffs Well the tearing down of the local library to make room for a car-park the flooding of the footpath to the station that has never been resolved the lack of parking restrictions in the village, so pushing a pram or wheelchair is proved impossible without going onto the road.

These are 'small fry' comments, but this is what regeneration should be spent on. You give big money to some of these contracts but like Awetu you do not inspect and evaluate how it is spent.

Come and have a look for yourself.....

It's a comfortable life as civil servants running a little consultation exercise. Come and see the reality of your inaction.

Jayne Smith
Local resident
Taffs Well and Pontypridd district

18. ACPO

Mae Cymdeithas Prif Swyddogion Heddlu Cymru (ACPO) yn gorff strategol annibynnol sy'n darparu'r llais proffesiynol ar gyfer arweinyddiaeth yr heddlu yng Nghymru. Er budd y cyhoedd ac mewn partneriaeth â'r Llywodraeth a Chymdeithas Awdurdodau'r Heddlu, mae ACPO Cymru yn arwain ac yn cydgysylltu'r broses o gyfeirio a datblygu gwasanaeth yr heddlu yng Nghymru. Pan fo'r wlad mewn angen, ar ran pob un o'r Prif Gwnstablaid yng Nghymru, bydd ACPO Cymru yn cydgysylltu'r ymateb plismona strategol. The Association of Chief Police Officers (ACPO) Cymru is an independent, strategic body which provides the professional voice of police leadership in Wales. In the public interest and, in partnership with Government and the Association of Police Authorities, ACPO Cymru leads and co-ordinates the direction and development of the police service in Wales. In times of national need, on behalf of all the Chief Constables in Wales, ACPO Cymru, coordinates the strategic policing response.

Mark Polin QMP MBA Prif Gwnstabl Pencadlys Heddlu Gogledd Cymru Glan-y-Don Ffordd Abergele Bae Colwyn LL29 8AW Ffon. 029 20801016 ACPO Cymru Mark Polin QMP MBA Chief Constable North Wales Police Headquarters Glan-y-Don Abergele Road Colwyn Bay LL29 8AW Tel. 029 20801016 "Llais Proffesiynol Arweinyddiaeth yr Heddlu yng Nghymru" "The Professional Voice of Police Leadership in Wales"

HEB FARC GWARCHOD - NOT PROTECTIVELY MARKED

3 Ionawr/ January 2013

Regeneration Policy Team 2nd Floor Welsh Government Cathays Park Cardiff CF10 3NQ

regenerationpolicy@wales.gsi.gov.uk

Vibrant and Viable Places - NEW REGENERATION FRAMEWORK

Date of issue - 22nd of October 2012

Responses required by - 14th January 2013

Prepared by Superintendent Jon Burley Police Liaison Office Welsh Government
Thank you for the opportunity to comment on the proposed new regeneration framework; I offer the following observations on behalf of ACPO Cymru (Wales).

Key Questions and Responses

What is your feedback on lessons learned from delivery to date?

We feel it is vital to join up the front-end service delivery for tackling poverty with the community safety and crime reduction arrangements that are in place locally. The introduction of the single integrated plans by April 2013 provides an excellent opportunity to share boundaries beyond those of local authorities. We would suggest that any strategic boundaries mirror those outlined within the Simpson review, i.e. they should be based on, broadly speaking, Health Board areas.

Should other national outcomes principles be considered?

The strategy complements "Local to Global: Reducing the risk from Organised Crime" produced by the Home Office. The strategy recognises that organised crime takes root in deprived communities where legitimate opportunities are reduced. Poverty breeds alternative criminal networks where business enterprises are based on illegal activity such as counterfeiting, people trafficking and drugs. Once organised crime takes place within the community it can damage their fabric and have a negative impact on local legitimate business. *Mae Cymdeithas Prif Swyddogion Heddlu Cymru (ACPO) yn gorff strategol annibynnol sy'n darparu'r llais proffesiynol ar gyfer arweinyddiaeth yr heddlu yng Nghymru. Er budd y cyhoedd ac mewn partneriaeth â'r Llywodraeth a Chymdeithas Awdurdodau'r Heddlu, mae ACPO Cymru yn arwain ac yn cydgysylltu'r broses o gyfeirio a datblygu gwasanaeth yr heddlu yng Nghymru. Pan fo'r wlad mewn angen, ar ran pob un o'r Prif Gwnstabiliaid yng Nghymru, bydd ACPO Cymru yn cydgysylltu'r ymateb plismona strategol. The Association of Chief Police Officers (ACPO) Cymru is an independent, strategic body which provides the professional voice of police leadership in Wales. In the public interest and, in partnership with Government and the Association of Police Authorities, ACPO Cymru leads and co-ordinates the direction and development of the police service in Wales. In times of national need, on behalf of all the Chief Constables in Wales, ACPO Cymru, coordinates the strategic policing response. 2*

HEB FARC GWARDHOD - NOT PROTECTIVELY MARKED

Strategies based around strengthening families and achieving educational attainment are welcome and where issues arise, multi-agency interventions such as teams around the family and/or child should be applied in line with the Families First agenda.

What more can be done to achieve greater coherence across cutting action across departments?

Better recognition of the impact of criminality within deprived communities. For example, cheap stolen or counterfeit goods undermine legitimate sales and are often used to fund other criminal activity such as prostitution and the sale of illegal drugs. Furthermore, individuals become powerful within the community and create criminal networks that generate other crime and poverty.

We believe that the licensing arrangements within town centres require careful consideration and whilst alcohol can be part of a successful town centre strategy the involvement of the regulatory authorities at an early stage to prevent "saturation" of licensed premises is important and will provide a more sustainable basis for vibrant town centres in the future.

Do you agree with the national, regional and local approach set out?

Yes in general terms, but the consistency of regional boundaries is critical to success and they should be harmonised across the single integrated plans and other strategic imperatives. The strategic impact of crime and disorder on poverty is often not made out. However, areas that experience poverty are more likely to experience crime.

Information sharing can be seen as difficult as it can be culturally unacceptable and/or is seen to put vulnerable people at greater risk. This can lead to a safe environment for organised criminals to undertake illicit enterprises such as the illicit trading of DVDs and sexual exploitation.

Do you have any comments on our proposals for how we would target indirect funding?

No, but these should be focused on very clear outcomes

We want to ensure effective monitoring and evaluation of regeneration activities does the approach set out achieve this?

In addition to monitoring activities and projects it is key to involve the police and crime reduction partnerships within the planning process so crime can be designed out at an early stage. The establishment of an infrastructure to prevent crime is as equally important as the activity. Therefore information sharing and joint working is critical to preventing organised crime taking hold and to divert young people from an aspiration of becoming a criminal success or a sense of hopelessness mitigated by illegal drugs.

Yours sincerely

Mark Polin

Prif Gwnstabl Heddlu Gogledd Cymru

Chief Constable North Wales Police

19. Flintshire County Borough Council

Flintshire County Council response to Welsh Government Consultation Document – Vibrant and Viable Places: New Regeneration Framework

December 2012

Flintshire County Council welcomes the consultation on the new Framework for Regeneration in Wales and the recognition it gives to the importance of regeneration in the current difficult economic climate.

The Council identifies that there are a number of improvements that can be made in the approach to regeneration taken to date by the Welsh Government and its partners in local government:

- At a time of great pressure on resources, more and better co-ordination is needed between the different programmes of work undertaken across the Welsh Government programme, in order to achieve value for money. Whilst it is recognised that, in part, the requirements of external funders, such as the European Commission, do bring in pressures, there are still very wide areas of discretion within which the Welsh Government can facilitate integration between programmes. For example, a strong commitment to jobs, investment, training and support for young people can form 'golden threads' linking all programmes delivered by, and through, Welsh Government.
- A clearer focus on outcomes is needed through the whole regeneration process. In some cases, the Structural Funds, Communities First and the Rural Development Plan programmes have been more driven by process and on collecting output data, rather than making meaningful contributions towards strategic outcomes. The revised outcome framework for the Communities First programme, for example, is much welcomed in leading activity towards a strategic direction of travel whilst allowing locally determined flexibility for delivery.
- In some areas, for example, the Rural Development Plan programme, there is a level of bureaucracy which is beyond what should be expected with the relatively modest outcomes produced. The RDP has wasted scarce resources and created structures that are insufficiently flexible to meet changing local needs or are little integrated with other regeneration initiatives.

The Council sees the key priorities for regeneration as:

- raising levels of employment, particularly for young people, by addressing barriers to employment and increasing the range and quality of work opportunities available, including apprenticeships;
- creating the right conditions to attract new investment into Wales;
- making the best use of the Enterprise Zones opportunity to drive employment growth and to facilitate wider regeneration;
- meeting the skills needs of employers, especially for higher quality jobs;
- town centre regeneration and helping towns to develop new roles in a changing environment;
- supporting entrepreneurial activity, including developing the social business sector;

It is gratifying to see that many of these priorities already feature in the draft Framework.

The Council has developed a strategic and successful approach to regeneration including the following elements:

- Deeside Regeneration Area. The Council has established the Deeside Regeneration Area to integrate a range of WG and FCC programmes of work to address the largest concentration of deprivation in the County and to use the opportunity presented by the Enterprise Zone to facilitate wider regeneration in the local area and given that Deeside is a regional employment centre,

neighbouring areas of North Wales.

- Deeside Enterprise Zone. Deeside with 20,000 jobs, mostly in the manufacturing sector, is a strategic regional employment location. The ambition of the DEZ Board is that the area can generate 7,000 net new jobs and, with the right approach, most of these job benefits can be captured for North Wales. However, this will require a new approach towards strategic regional investment.
- Development of the Enterprise Zone has progressed at a rapid pace and the Board, supported by Flintshire County Council, has ambitions to generate significant added-value alongside the planned investments. The Advanced Manufacturing Centre concept, recently highlighted by the Minister, is an example of the kind of innovative approach being developed in Deeside.
- Mersey Dee Alliance. This partnership of public sector bodies has contributed significantly to the strategic planning landscape of the North East Wales / West Cheshire area and has enabled a co-ordinated approach towards economic development in an economically powerful region. There is a strong view that this area should be declared as a city region, both to drive forward economic development in North Wales and, given the declaration of two city regions in South Wales, to allow development to take place in a balanced way across Wales.
- Flintshire Regeneration Partnership. This partnership was formed in 2005 and brings together representatives from the public, private and voluntary sectors to lead regeneration in the County. The Partnership engages with a broad range of stakeholders each year through an annual conference to review progress and refresh priorities. The experience of this Partnership is that partnership working enables projects to be delivered that might otherwise not be addressed and that limited resources need not be a barrier to success.
- Communities First. The Council has worked closely with the Partnership Boards to shift the emphasis of the programme more closely to end outcomes, including job creation and entrepreneurship development. Jobs fairs, jobs clubs and pre-employment support for unemployed people all form part of this approach, delivered in conjunction with both businesses and support providers. Since April 2012, this approach has supported 200 local people and helped 140 to enter employment.
- Flintshire Business Week. This annual event is led and funded by the private sector and provides opportunities for businesses across the sub-region to network, to learn and raise awareness of the products and services available across North Wales and promotes investment in the County. In 2012 Flintshire Business Week attracted nearly 2,000 business representatives, £90,000 cash sponsorship, but with even greater benefits in the form of goodwill and networks.
- Town Action Plans. This programme was established in 2007 to help local town centres fight back against the twin threats posed by out of town shopping and internet retailing. Private sector-led partnerships have been established in eight towns and these are developing locally-based programmes for their own towns.

The Council feels that there are valuable lessons from this approach that could be learned in developing the future approach to regeneration. In the absence of wider regeneration resources, many of these approaches have been developed with limited public funding, but have succeeded in engaging wide sections of the community and in drawing down significant support in both cash and kind. This is viewed as a model

that can be rolled out elsewhere. The Council hopes that the future approach to regeneration outlined in the draft Framework will enable these initiatives to further increase their impact.

In responding to the draft Framework Flintshire County Council recommends that:

- In a period of unprecedented pressure on public sector budgets, there needs to be a greatly increased focus on co-ordinating programmes of work to deliver meaningful change against a more limited number of strategic priorities. Spreading resources too thinly or allocating them to projects with limited real impact must be avoided.
- There is significant consensus on the main priorities for regeneration across the sub-region, but different circumstances for delivery in each area. Sub-regional structures are best placed to set the main strategic direction for regeneration but should then rely on local partnership and governance to deliver against the strategic outcomes. Wherever possible, effective existing structures should be used, such as the North Wales Economic Ambition Board.
- Flintshire County Council has carefully assembled the disparate programmes of work arising from the Welsh Government into innovative and effective regeneration programmes locally. Future programmes from the Welsh Government should be integrated together around the strategic priorities and outcomes for the region and should enable a place based approach to regeneration by local structures. The Town Action Plan and Deeside Regeneration Area partnerships will be ideally placed to make rapid and effective progress if they are given the opportunity to do so.
- There needs to be better integration of the Rural Development Plan into wider regeneration. There needs to be stronger focus on aligning the resources of the programme to a smaller number of strategic priorities and outcomes and on using the LEADER element of the programme to contribute meaningfully towards these. A more flexible programme management approach at Welsh Government is needed to enable local activities to shift in response to external influences.
- Harnessing the energy of local communities has been proven, through the Town Action Plan programme, to offer a great deal of added value to the regeneration process, improving governance and enabling a more cost-effective approach to be taken. This should, though, be directed towards delivering the agreed strategic priorities for the area.
- The draft Framework needs to give stronger recognition to the role of housing, including the WG housing renewal programmes, in regeneration. Although the supply-chain benefits are noted the role of the physical investment itself, particularly in town centres needs greater prominence. The Deeside Regeneration Area, for example, is well placed to target housing investment alongside other programmes as part of the wider regeneration approach.
- That the learning from the evaluation of area-based projects across the UK is reviewed. The evidence base calls for a much clearer approach by policy makers in deciding the appropriate geographical scale for intervention and for ensuring that activity is linked meaningfully to desired outcomes. Failure to do so will result in wasted resources.
- It is crucial that projects and programmes are clear on the logic chain between their activities and the outcomes that they are seeking to improve and that they can be measured effectively against this. The Rural Development Plan, for

example, has used an indicator structure that focuses too strongly on achieving a rather limited range of outputs from the Welsh Government framework rather than focussing on meeting high level outcomes. This is an extremely bureaucratic process which can be significantly refocused, for example, do we need six rural development companies in North Wales?

In summary, Flintshire County Council welcomes the opportunity to comment on the draft Framework for Regeneration and sees it as a crucial refocusing of the sector at a critical time of economic difficulty and public sector constraint. There are important lessons to be learnt from the past in developing the new approach that could lead to a more co-ordinated and effective approach in the future. A clear focus on outcomes throughout the regeneration process is imperative. There is a strong foundation of success and innovation in Flintshire which the future Welsh Government programmes will be able to build upon.

20. Tourism Partnership North Wales

TOURISM PARTNERSHIP NORTH WALES – PARTNERIAETH TWRISTIAETH
GOGLEDD CYMRU

WELSH GOVERNMENT CONSULTATION DOCUMENT: VIBRANT & VIABLE
PLACES NEW REGENERATION FRAMEWORK

RESPONSE TO THE KEY QUESTIONS

1. What is your feedback on lessons learnt from delivery to date?

There is a need to recognise the changing role of town centres and accept that we have moved away from interrupted growth in retail, to retail peak, and that the heart of our towns will involve regeneration through much increased public spaces, mixed housing regeneration not just social housing, and accessible integrated transport hubs, so as to make them desirable places for people.

Regional collaboration will be essential but any plan for a region must be owned by the region and its partners. The embryonic Economic Ambition Board in North Wales is a step in that direction. However there must be recognition of sub-regional variations as in North West and North East Wales - akin to the former Spatial Plan. This will enable greater focus and agreement being more easily achieved by three as opposed to six partners.

It will remain dependent on local delivery structure delivered by the local authority as the project instigator.

Ideas on how to direct targeted investment must be still substantially based on job created opportunities, but also focus on projects that will make the difference and with the capacity of being measured as making a breakthrough and having a satisfaction index based on people and places.

Structural funds in recent times have been dominated by public sector-led investment and some of these leave a legacy of future public sector revenue support requirement. There should be increased emphasis on private sector regeneration investment.

Rural Development Plans have had different degrees of success, but have spawned many non-sustainable interventions and in future require to be joined-up in their approach, this on a sub-regional basis. In the case of North Wales overseen by a regional structure but with two sub-regional deliveries in North West and North East Wales, so that a more meaningful, sustainable and integrated activity takes place. Equally the programmes are required to be on a longer time scale, rather than through the 3-year peak and troughs.

Sustainable and resilient communities – places, should remain as a focus.

Housing led regeneration – this will remain one of our key tools and the greatest priority must be to identify the location for regeneration projects which can impact upon a place and its desirability as a place to live, play and work.

Enterprise Zones are an equally key component of the regeneration programme, but their success will depend on integrating transport connectivity especially with ‘park and share’ opportunities on key routes, eg. A55, to these new work hubs. Equally their promotion should be integrated into the wider investment promotion of the region.

Re North Wales example projects – these should be looked at in the round and looked at critically in the context of what has made the difference; what is the number of jobs generated and sustained; along with the cost of the job. The examples should be considered in terms of the North West and North East Wales sub-regional areas, not just North West Wales as highlighted.

2. Should other national outcomes or principles be considered?

The broad national outcomes scheduled do not illustrate specific numeric targets and values that will be measured – this may be a background proposal that is not stated but is important to provide so as to give focus.

While there must be national outcomes there must be regional outcomes as well so as to drive focus and ownership.

Thos outcomes should reflect not just our own internal objectives but how we will benchmark our outcomes against our competitor communities in other regions of the United Kingdom.

Within prosperous communities we would welcome preference to Destination Management of places by each local authority measured in terms of outcomes of customer satisfaction index.

3. What more can be done to achieve greater coherence and cross cutting action across departments?

The people and place approach is endorsed.

Spatial planning will continue to be a major element that will require the inclusion of sub-regional to the national, regional and local levels: this to reflect sub-regional variations between North West and North East Wales, and achieve speedier cohesion on some elements. This more speedily achieved between three local authorities as opposed to six local authorities on some issues.

The private sector must be engaged at the regional and sub-regional level, and in particular to ensure that there are high levels of private sector investment and ownership in the solutions.

Planning – the evolution of the planning system in order to secure a less parochial and speedier solution to accelerate investment must be a highest priority.

4. Do you agree with the national, regional and local approach set out?

The new delivery framework and key roles should include reference to sub-regional as well as local, regional and national basis. The local basis should have strong focus upon local delivery.

The local basis should also really have strong integration of local development plans with neighbouring areas.

The regional basis should include reference to sub-regional level so as to recognise the spatial differences between opportunities and challenges in North West and North East Wales, for instance, tourism will be a higher priority in North West Wales, inward investment a higher priority in North East Wales.

The regional approach places greater emphasis on cross-boundary cooperation which is essential.

There is opportunity to acknowledge that certain local authorities will become lead specialists on areas of work, regionally or sub-regionally.

The North region footprint is welcomed, i.e. the inclusion of Meirionnydd will certainly make things operationally easier for Gwynedd Council.

Montgomeryshire in northern Powys may be less comfortable in the south west and mid region, having established ties to the north for example in housing association footprint, and stronger economic orientation to North East Wales.

The establishment at national level of National Regeneration Ministerial Advisory Group would be a positive step especially in looking at what investments are taking place that will make Wales benchmark nationally against other regions of the UK and increase our competitive position as the place of Wales.

5. Do you have any comments on our proposals for how we will target and direct our funding?

The business plans should include reference to overarching vision for rural areas.

The place-based approach is welcomed.

The deprivation characteristics (section 6.iii) would benefit from the inclusion of a further bullet point: 'places where people do not wish to visit'.

The government structure of regional board is welcomed, and as the visitor economy remains a key component in North Wales, representation for Destination Management and the place of visitation should be a key consideration. This would reflect on point 5 on page 32 in terms of the competitiveness of an area for investment and visitation.

Inward investment and visitor marketing investment should share common brand values, characteristics. Local delivery will remain very much focused on the local authority.

6. We want to ensure effective monitoring and evaluation of regeneration activities, will the approach set out achieve this?

The RDA model is welcomed, but this should not be looked at in terms of isolation as we must compare with our neighbour regions within the UK, and establish at what levels we intend to strive and make progress to achieve parity against these other communities.

Dewi Davies

Regional Strategy Director, Tourism Partnership North Wales

4 January 2013

21. Alan Brown Associates

Vibrant and Viable Places

New Regeneration Framework

Consultation Response

By Alan Brown, MRICS 2

1. What is the feedback on lessons learnt from delivery to-date?

One of the most disappointing features of the Vibrant and Viable Places, Consultation Document is that it does not draw any conclusions from the substantial pieces of work that were undertaken as part of the review process i.e.

- The Evaluations of Town Centre and Seaside Town activities – Miller / Wave Hill
- A survey of International Best Practice - CREW
- A Summary of Key Economic Evidence – WG

If it did and the principles of Results Based Accountability were applied the inevitable conclusion to be drawn is that no matter how well intentioned regeneration activities have been over the last 30 years they have largely failed to improve the economic well being of Wales and increase personal prosperity.

Whilst there have been an impressive list of outputs (listed in the above reports) and some excellent examples of best practice the key question largely unanswered is whether the people of Wales are actually any better off?

The allocation of yet another round of European Structural Funds, the continued presence of Wales at the bottom of the UK, GVA, Health and Education league tables and circa 300,000 Welsh households requiring rate subsidy suggest that past and current Regeneration policies and strategies have largely failed.

It is accepted that in a worldwide economy Wales is not a master of its own destiny and the legacy of heavy industrial decline still remains. However, this is the reality of the situation so perhaps now is time to face facts and think afresh.

For these reasons I hoped that the Vibrant and Viable Places Consultation document would take a bolder and more “game changing approach” to the future support and delivery of Regeneration In Wales.

Unfortunately the document fails to do this and instead adopts a somewhat cautious and mediocre stance being mainly concerned about how Regeneration is to be controlled and delivered via a new proposed governance framework.

By avoiding the evidence and not applying Results Based Accounting suggests that what has gone to-date is largely okay and with some slight modifications and tweaks it will be business as usual under a new governance structure.

What the Consultation document and supporting information fails to articulate and explore is how the “spark” of successful regeneration projects actually catch fire and then make significant differences to local communities and wider Wales.

As a regeneration practitioner of some 30 years standing I have found that it is usually people, communities or companies who create the spark and light the fire of regeneration. Having done so it should then be the role of the public sector to support and encourage rather than lead. There are plenty of practical examples of this at both at the macro and micro level such as Coed Darcy, Mold Cillaslow, Abergavenny Food Fair, Blue Stone National Park Resort, Celtic Manor, Glyncoch Community Regeneration, Cwmni Tref Initiative, Caernarfon and Hay on Wye Book Town. The tone of the current Consultation document suggests the Public Sector is the primary stimulant for Regeneration across Wales but based on my experience this is a flawed assumption.

Dig into the supporting evidence base and it is clear that Regeneration in Wales has been very much a “top down” not “bottom up” approach. The failure to engage or excite people and communities at a local level could perhaps be a reason why activities to-date has not brought about increased prosperity, sustainable communities or transformational change.

Interestingly the current approach in England has been for Government to throw out challenges to local communities, cities and regions to bid for regeneration funds. In going forward with decreasing public expenditure perhaps WG should direct their efforts at supporting innovative regeneration proposals and challenge the people and communities of Wales to become more “hands on” and directly involved. This form of “X” Factor regeneration whilst creating some winners and losers could create a real buzz across Wales similar to the Mary Portas Initiative in England. Whilst Portas has had its critics it has at least got whole Towns talking to one another about their future thereby moving the impetus for regeneration to a much broader community base. Whilst some of the above words may seem harsh it is interesting that Wales is not alone in experiencing regeneration failure.

A review carried out in September 2012 by the Work Foundation (part of Lancaster University) entitled “People or Place” Urban Policy in an Age of Austerity looked critically at the last decade of English Urban and Regional Policy and in particular the work of Regional Development Agencies and New Deals for Communities.

The key findings for this comprehensive piece of work were that:

- In the case of RDA’s regional economic disparities actually increased.
- The New Deal for Community Areas achieved significant improvements in relation to place but saw limited improvements to people based outcomes.

There is now a growing view from private sector regeneration practitioners that what we knew as Regeneration is in fact dead and the new agenda must move towards a focus on resilience and re-fitting which has more to do with localised, people based strategies than grand projects and strategic delivery bodies. 5

This would seem to fit with some of the themes and commentary within the current consultation document so although I am critical about what we have learnt from delivery to-date I leave this section on a positive note.

However it is apparent that some hard decisions now have to be made about current delivery structures, allocation of budgets and the future direction of travel if we are not to perpetuate the mistakes of the past.

2. Should other national outcomes and principles be considered?

There is a stated objective to align the New Regeneration Framework with the Welsh Governments Programme for:

- Prosperous Communities
- Learning Communities
- Healthier Communities

In addition outcomes from the following emerging WG government programmes also have a direct impact on the proposed New Regeneration Framework:

- The Wales Infrastructure Investment Plan
- City Regions
- Local Growth Zones
- Sustaining a Living Wales
- European Structural Funds

This recognises that Regeneration cannot be viewed or delivered as a standalone activity as it embraces most aspects of day to day life in Wales and impacts on the activities and budgets of most WG departments.

3. What can be done to achieve greater coherence and cross cutting across departments?

Starting at the top it is confusing and unnecessary to have two separate WG Ministers dealing with Regeneration matters.

A number of key Regeneration issues such as Enterprise Zones, City Regions and Local Growth Zones all sit outside the current portfolio of Huw Lewis. As the consultation document is silent on this issue it is assumed that the current split responsibilities will remain which is disappointing.

The current twin track approach is confusing to the private sector and particularly external investors who are not familiar with the inner workings of WG.

The economy and population of Wales is neither large nor complex enough to justify the current dual Minister approach and the current split responsibilities suggest a duplication of activity with 6

Two departments working separately with budgets and programmes delivered at differing timescales and levels of priority.

To achieve greater cross cutting and financial coherency WG could possibly adopt a “Total Place” approach thereby looking at the totality of combined WG, Local Government and quasi public spending across Wales. The “Total Place” approach previously pioneered in England by the last Labour administration showed that by mapping and targeting the totality of public spending across selected areas brought about significant savings and improved delivery of services.

The concept of “Total Place” also starts from a citizen or community viewpoint thereby helping to break down organisational and service silos which sits well with aspirations expressed in the Vibrant and Viable Places consultation document.

The adoption of Results Based Accounting and the use of robust Programme Delivery tools such as the 5 Case Business Model should indicate to WG officials that they now need to think much wider than their own department when scoping and developing strategic projects. Much of this wider thinking needs to be done at the Outline Business Case (OBC) stage where a pre-requisite should be to consider cross cutting benefits and overall prioritisation of expenditure. This evidence should be provided as part of the Project Gateway Review. If adequate evidence or consideration of cross cutting is not provided at the Gateway Review the project should be halted and if necessary sanctions applied to the project team.

4. Do you agree with the national, regional and local approach set out?

The tone of the Vibrant and Viable Places document suggests that the proposed national, regional and local approach is a “done deal” and is not open to consultation. This is emphasised in Section 7 where a proposed time line is given for the establishment and adoption of the new framework bodies.

The three regional bodies seem to have been selected to suit a geographical consortium of the 22 Welsh local authorities. It is questionable whether the South West / Mid and North Regions fit functional economic areas so may not offer the best arrangement to align decision making, improve co-ordination or increase impact. Based on views expressed by delegates at the Welsh Regeneration Summit others seem to share concerns about the multiplicity and duplication of delivery bodies proposed across the Wales i.e. Health, Regeneration, re-aligned Communities First Programme and Planning etc.

Previous research by “Cheshire and Magrini – European Urban Growth 2005” has shown that where the level of decision making fits the economic footprint of a region the impact on economic performance is positive. 7

The experience in England of abolishing the RDA's has shown this to be painful, protracted and expensive process. The intention to do similar with the seven Welsh Strategic Regeneration Areas and Newport Unlimited perhaps needs greater consideration to ensure the current momentum of development is not lost along with private sector investor confidence.

Experience in England of establishing Local Enterprise Partnerships has shown that it has been easier where established partnerships have been adapted or built upon. Two good examples of this are Gloucester LEP and the West of England LEP. Interestingly despite this evidence the consultation document makes little reference to building around existing partnerships or the possibility of establishing a Welsh version of a LEP as an alternative governance and delivery model.

The Consultation document suggests that the composition of the National and Regional Boards will be drawn from a cross section of representatives from the public, private and third sectors.

Whilst this is encouraging I have concerns from a private sector standpoint about the practicalities of representation vis-a-vis potential conflicts of interest. As a current non executive director, independent advisor and school governor I am well aware of the process of "declaring an interest" at meetings. However, I am not sure this would work in case of representation at the proposed Welsh Regeneration Boards where active private sector practitioners could find themselves excluded from the majority of discussion.

I am sure the "devil will be in the detail" but should this be the case it is a shame as it would be very helpful for the boards to have representation from active private sector practitioners who are at the cutting edge of regeneration and can therefore present an alternative view from the market.

The potential transparency and process to be followed when electing board members to both the National and Regional Boards will also need detailed consideration.

For example I have found the current National Regeneration Panel to be a largely an anonymous body. The names of the individual panel members do-not seem to be publically listed nor are the Terms of Reference for this body.

I have attempted to search for this information on the WG internet site and although I don't believe there is anything sinister about the apparent lack of transparency it does suggest a culture where the WG and public sector are comfortable talking to each other but not the outside world!

Based on current arrangements and practices my concern is that in going forward the National and Regional Panels will be largely staffed by WG, Local Authority and a small number of (to avoid potential conflicts of interest) retired private sector representatives.

Should this be the case I can foresee much petty squabbling as representatives from each the 22 Welsh local authorities attempts to protect their local "patch". 8

In this respect are any of the local authority representatives going to be magnanimous enough to recommend that investment should be re-directed to an adjoining authority or neighbouring town as it offers better growth prospects? A recent example of this occurred in England where Newcastle, Sunderland and Durham all bid to host the Green Investment Bank, rather than working together on one collective bid that each area could have supported in order to bring benefit to all areas.

Turning to local delivery as a private sector Regeneration practitioner I work across Wales on a variety of projects. When undertaking assignments I often attempt to speak with WG Regeneration officials about funding opportunities, potential partnerships, technical advice, national /local priorities. I must say this is always difficult whether attempting to speak by telephone or internet search as it is never clear who the appropriate contact points is in WG.

From my experience the WG Regeneration Department is currently anonymous as it is difficult to find a staff structure that explains the responsibilities of individual team members and their contact points. As WG Regeneration officials are to provide executive functions for the proposed new regeneration delivery structure I hope that the current inward rather than customer or citizen facing mode of operation is not perpetuated.

This takes me to my final point in that Regeneration is largely a “Frontline Activity”. However, a great majority of WG and Local Government Regeneration personnel seem to spend more time based in Government offices and County Halls than on the frontline duty actually delivering regeneration. Whilst the formulation of strategy is important if there is to be a move to more community based “bottom up” regeneration this perhaps signals a need to redeploy current staff resources away from headquarters and into the field where the resources are actually required.

5. Do you have any comments on our proposals for how we will target and direct funding?

Much of the background evidence has already been prepared and is available as part of the current Vibrant and Viable Places, Consultation Document i.e.

- The Evaluations of Town Centre and Seaside Town activities
- A survey of International Best Practice
- A Summary of Key Economic Evidence – WG Chief Economist

It is therefore odd that WG are now proposing that Shadow Regional Regeneration Boards collate evidence, map existing services, consider funding etc. As this work has already been done it seems to be a waste of time and duplication of activity. As WG is the principal funding gatekeeper perhaps they should now take some political and executive decisions based on the current evidence base rather than what appears to be “passing the buck to Regional Boards yet to be established”? 9

In establishing robust strategies for targeting and directing funding research work by the OECD “How Regions Grow 2009” looked at the factors of critical significance to the rate of economic growth in underperforming English regions.

The following four key policy factors arising from the study have relevance to Wales and are helpful to the current consultation process.

- A changed mentality away from notions of subsidy and external intervention and towards growth potential and existence of endogenous factors.
- A focus on inter and inter-regional linkages rather than simply the relationship between central government and the region
- A concern to ensure there are spill over benefits from economic development and interventions
- Clarify how areas are governed, along with the focus and attitude of policymakers, on matters for economic development

It is apparent from the consultation evidence base that the historic approach to Regeneration in Wales has been almost entirely based on public sector intervention and subsidy.

The proposed New Regeneration Framework seems committed to perpetuating this approach with a regional investment plans emerging which are likely to be based on compromise and a sharing of resources rather than actual economic drivers or wider strategic benefit.

Unfortunately funding decisions in Wales often seem to have be made on the basis of the “cake principle” where everyone has to have a piece of the cake until it is cut so thin that that all that is left is crumbs.

Disappointingly the Consultation document makes little reference to inter-regional linkages between SE Wales / Bristol South West, North East Wales / Mersey / Manchester and Mid Wales / Birmingham / Midlands and the development and sharing of mutual and wider regeneration objectives.

It is also difficult to see how a New Regeneration Framework can be implemented in Wales until a WG decision is taken on whether City Regions are to be established in South East Wales and Swansea linked to the proposed electrification of the railway network.

The establishment of these two City regions would fundamentally change the ethos and approach to the governance and funding of regeneration across South Wales so it is puzzling why WG should seek to implement a New Regeneration Framework until a decision is taken on this important matter.

To add weight to this view Edwina Hart, the Minister for Business, Enterprise, Technology and Science issued a written statement on the 14th December that confirmed the establishment of two 10

Task and finish groups to start developing the concept of the City Regions in Wales and the regional structures.

Recommendations from the two groups are expected at the end of January.

Assuming a decision is taken to establish a South East Wales and Swansea City Region my approach would be for WG to control funding centrally and then challenge the remaining areas of Wales to work together to bid for finance based on a series of key regeneration themes which have largely already been identified in the consultation process.

Suggested themes at both a macro and micro level could be as follows:

- Infrastructure Led Regeneration
- Town Place Shaping – linked to Bid's / Meanwhile Uses
- Seaside Town Place Shaping – linked to Tourism
- Housing Led Regeneration
- Education / Pathways to Employment Led Regeneration
- Energy Led Regeneration
- Heritage Led Regeneration
- Culture Music / Drama etc Led Regeneration

The themes can be combined but the challenge will be for the applicant bodies to demonstrate collaboration from all sections of society and plans that meet locally determined needs. Large projects should have a 20 year vision, a Masterplan based on a clear evidence base, demonstrate community involvement and have an agreed delivery body which has prepared a results based and deliverable business plan.

The overall aim will be for WG and the public sector to become less interventionist and throw out a challenge to the remaining Welsh Cities, Towns, Communities and Citizens to come forward with their own innovative and exciting regeneration ideas. Broad guidance will be necessary and possibly some support for local communities to formulate applications.

This would allow a more “bottom up” entrepreneurial approach to local regeneration delivery, whereas the proposed New Regeneration Framework seems to perpetuate the mistakes of the past which are largely based around top down intervention hampered by local politics.

6. Effective Monitoring and Evaluation of Regeneration Activities

The average life of a typical regeneration project from inception to completion often takes a minimum of 7 years. To be successful in regeneration therefore requires a persistent and resolute attitude to cope with the “rollercoaster” ride of inevitable setbacks such as, changes in the market, planning delays and funding difficulties which inevitably are encountered along the way.

An effective monitoring and evaluation system therefore needs to have longevity and be sufficiently robust to cope with probable changes in both project and delivery personnel. 11

The adoption of a robust project management methodology at the outset of regeneration activities should ensure an effective monitoring and evaluation system is embedded in the delivery process. Recognised methodologies such as the 5 Case Business Model, Prince 2, and OBC Gateway Reviews all comprise monitoring and evaluation regimes which can span the life of the most complex project.

It is always at the development of options (outline business case) where the most time should be spent as it is then when projects can be culled or modified without incurring great public expense.

The relationship of long term project revenue costs should also be considered in greater depth. Unfortunately there has been a litany of high profile regeneration projects built at large capital cost which after a couple years of operation have closed due to the absence of insufficient revenue income or the presence of a realistic or sustainable business plan.

Finally existing governance appears to be weak across a number of high profile publically funded regeneration projects with poor terms of reference and little use of independent non executive expert directors.

Best practice confirms that project governance should be considered at the outset not as an afterthought when problems or financial difficulties occur.

The proposed introduction of a Results Based Accounting system which measure outcomes as opposed to outputs is a step in the right direction. However, a change in the culture of delivery personnel may be required as many seem to be too focused on outputs as opposed to outcomes and the crucial issue as to whether anyone is actually going to be better off by the process of regeneration.

There are few quick wins in Regeneration and an effective monitoring and evaluation system should recognize this.

22. Pembrokeshire County Borough Council

PEMBROKESHIRE COUNTY COUNCIL

Response to the Welsh Government Consultation document –
Vibrant and Viable Places - (New Regeneration Framework)

Introduction

Pembrokeshire County Council welcomes the opportunity to provide commentary and feedback on the Welsh Government's consultation document. Regeneration is a key component of a more sustainable economy and prosperous society in Wales. As such, it is axiomatic that there is improved coherence at national and local government level; that there is a greater emphasis on outcomes (national and local); that there is a clear statutory mandate and sustained investment through simplified and transparent governance structures.

Pembrokeshire County Council participated in the National Regeneration Summit on the 15 November 2012 and in the South West Workshop in December. Whilst we agree with the Minister's comments (at the Summit) about the need for "unprecedented urgency" we are concerned that proposals for 'shadow structures' ride roughshod over the consultation process.

The response below addresses the questions raised in the Consultation Document and includes a commentary on an 'alternative approach' to delivering the regeneration agenda in Wales.

What is your feedback on lessons learnt from delivery to date?

- That a positive and forward-looking mindset provides the best environment for regeneration and creation of "vibrant and viable places".

- Too often, delivery has been about halting decline. It needs to be transforming, collaborative and constructive, preparing places and communities for the future; utilising all their assets and special qualities.
- That there appears to be a limited amount of strategic evidence to support regeneration funding priority areas.
- That good transport infrastructure is required for business to thrive. For business good road and rail (and air if practicable) connections to markets are key. For seaside towns visitors need to be able to travel to and from their destinations using reliable, time efficient and comfortable transport (of course the Offer at the destination needs to be there which would include walking, cycling and horse riding routes and facilities).
- No examples given of any Welsh Government investment in Pembrokeshire within the 'Viable and Vibrant Place' consultation document. There is no Regeneration Area in Pembrokeshire, only two Communities First areas currently in the county, one fewer than in 2002, the bid for Pembroke Dock rail station turned down, and the Technium status removed.
- Lack of outcome planning has led to tiers of unnecessary bureaucracy within WG. The Structural Funds match funding "pot" was impossibly difficult to access. It having a separate application process running parallel to that for the EU funds wasted resources of both the WG and applicants.
- Local Authorities are key to the delivery of regeneration and are better placed in many instances than WG to do so. EU funds should be delegated to Local Authorities for delivery through CLLD approach (at a local level) and ITI mechanisms (on a regional level) during the 2014 – 2020 programming period.

1. Should other national outcomes or principles be considered?

- The New Regeneration Framework marks a significant turning point in Welsh regeneration policy; the National Outcomes are clear and concise, and are collectively, ambitious and challenging enough.
- Trying to achieve multiple objectives from one funding stream is attractive but often results in compromises that detract from the achievement of the main regeneration aims.

2. What more can be done to achieve greater coherence and cross cutting actions across partnerships?

- Partnership working is fundamental to delivery; achieving a "whole government approach" is a considerable challenge, but is key to the success of the New Regeneration Framework, and a necessary keystone which needs to be in place from the very beginning.
- A transparent working methodology across Welsh Government that endorses and leads by example this regeneration process must be the starting point.
- It is unclear how all Welsh Government departments will be co-ordinated to mobilise such an ambitious collaborative regenerative effort. The highly strategically driven approach described in this document is at odds with current working practises which appear to be of endorsing individual initiatives seemingly without a "grand plan".
- Real-world timescales, good communication and a forging of lasting partnerships will be needed especially as limited funding is going to be a reality for the foreseeable future.

- Realistic expectations are embedded in any work programme where learning from other programmes is the norm and existing frameworks/partnerships are utilised for delivery.
 - Local views cannot be limited to those of Communities First Partnerships. Nor can the boundary of any work programme be limited to working within that geographic boundary or measured against the impact upon Communities First areas.
3. Do you agree with the national, regional and local approach set out?
- The approach could provide a framework for certainty, transparency and co-ordination, but it is fraught with opportunities for duplication, overlap and stifling of innovation, with a real danger of unwieldy bureaucracy and long timeframes derailing the delivery of regeneration activity.
 - What the national, regional and local approach needs to do is harness enthusiasm and involvement, and build a momentum to prepare people and places for a better future. This will take sensitive, effective and strong leadership at all levels, utilising local knowledge, listening to and valuing all partners.
 - We support the recognition that the local authority role in regeneration can grow in scope and influence within the New Regeneration Framework. We believe that decision making would be best at Local Authority level where there is in depth knowledge of areas and awareness of the national and regional strategies
 - We cannot agree that West and Mid area is fit for purpose. The South West and Mid Wales area that Pembrokeshire will fall into is a large diverse area with unique and different challenges. It is too large and too disparate. Do we have to have these regions as well as city regions? How can both be coherent?
 - This creates a very long decision making chain where it seems decisions at a local level can't be implemented until endorsed by the sub-region, then endorsed by the region and finally approved by the Minister. Also local plans will not be set until regional plans are set and these will wait on national decisions. The result will be gridlock.
 - Welsh Government needs to be mindful of the timeframe required for the delivery of the next EU programmes and not to set up structures that potentially will hinder their development.
- The idea of overseeing all regeneration projects centrally by a Ministerial Advisory Group seems unrealistic. Their view will either be so high level that observations in respect of individual schemes will be unrelated or so detailed that they will be over-run with work.
 - There is a danger of too many publicly funded bodies consuming resources that would be better directed to providing the infrastructure, which would facilitate growth.
4. Do you have any comments on our proposals on how we will target and direct funding?
- There is a concern that the scope of the regeneration business plans, are too wide, lacking a clear focused final anticipated position.
 - The document refers to the wide nature of regeneration and the fact that it includes everything from healthy eating and crime prevention to investment in

business parks and public procurement. Where are the boundaries of the business plan to be drawn?

- If no boundaries are provided the likelihood is that business plans will continually be rejected because they don't include some aspect of regeneration.
 - The regeneration business plans cannot simply be a mechanism to target additional funding into Communities First areas, there needs to be clear, consistent and transparent funding criteria developed. This must acknowledge that urban regeneration is only one element of a suite of regeneration topics that need to be developed across Wales, the rural dimension must be given equitable consideration in any regeneration business plans.
 - That the development of one regeneration initiative i.e. City Region will not exclude the opportunity to develop others within the same local authority area.
 - Regeneration requires multi-annual planning this is especially true of physical regeneration and the proposed processes are not suited to this.
 - If Welsh Government funds are to be used in conjunction with EU funds then there must be coherence between the criteria used for the allocation of EU funds and the criteria used for the allocation of WG funds.
 - The new regional regeneration boards will need to be allied to existing structures to carry out the mapping of activity and business-planning effectively: let's hope they are.
 - Trying to pick winning projects (outside the normal commercial context) may lack objectivity and could result in wasted resources.
 - The recognition that there remains a rationale for targeting additional funding, over and above mainstream spend and specific regeneration interventions, is strongly supported. Gap funding to make schemes happen is a crucial intervention.
5. We want to ensure effective monitoring and evaluation of regeneration activities; will the approach set out achieve this?
- The utilisation of simple, understandable assessment against specific and measureable criteria essential.
 - Monitoring and evaluation practice in EU programmes more advanced than in domestic regeneration initiatives. As a result local authority European and regeneration teams have amassed a good deal of experience in this field and this should be brought to bear so benefiting wider regeneration efforts.
 - Feedback from evaluation, where positive, will reinforce and add value to the regeneration activity, by generating stronger commitment to the vision of "Vibrant and Viable Places." Effective monitoring and evaluation will also be tools to flag-up where intervention is not working so well.

Additional comments – an alternative approach

- The proposed regions do not provide a coherent footprint for decision making and the allocation of resources.
- It is unclear how regional regeneration projects will be developed. For example, if they are to be jointly funded by local authorities and the Welsh Government, there is a fundamental issue (of legality and S.151 accountability) as to whether local authority 'A' can financially contribute to a regional regeneration project that is being developed in local authority 'B'.

- Most regeneration actively takes place at the local authority geographical level; and yet local authorities vary considerably in terms of the priority and funding they allocate to support regeneration activity.
- An alternative approach to developing a long term, strategic and embedded regeneration agenda for Wales, would be to:
 - (i) make regeneration a statutory function for local government in Wales
 - (ii) require each local authority to produce a 5 year Regeneration Strategy (to a template agreed by the Welsh Government)
 - (iii) require each local authority to engage with partners (through its Local Service Board) in the development of their Local Regeneration Strategy
 - (iv) Welsh Government to require each Local Regeneration Strategy to address the three Welsh Government national regeneration outcomes in addition to locally determined priorities
 - (v) Welsh Government to provide a 5 year funding commitment to each local authority to deliver 'national outcomes'.

In terms of regional, city-regional or sub-regional regeneration projects, an alternative approach would be for existing Regional Partnership Boards (and Economic Forums) to 'promote' projects, and for the National Regeneration Panel to consider and evaluate.

23. BIG Lottery Fund

Vibrant and Viable Places: New Regeneration Framework The response of the Big Lottery Fund

1. About the Big Lottery Fund

1.1 The Big Lottery Fund (BIG) is responsible for distributing 40% of the money raised for good causes through the National Lottery and supports projects in the fields of health, education, environment and the community. We currently distribute between £40-£50 million each year in Wales. Our programmes reflect Welsh strategic priorities and have been developed in consultation with stakeholders in the third and public sectors. Currently, over 90% of the investments made by BIG in Wales are awarded to the third sector. In recognition of the need for cross-sector funding to address the challenges faced by communities, we also support projects led by the public and private sectors.

1.2 The National Lottery Act 2006 confers powers that enable BIG to deliver funding from third party sources. This provides an opportunity to co-ordinate our funding with that of others, including government, applying our extensive experience to benefit new areas of activity. We expand on this in our response.

1.3 BIG adopts an outcomes approach to funding. This means that our main interest is in the social changes brought about by the projects we fund, rather than the means by which these are achieved.

2. Our key messages for the Welsh Government

2.1 The Big Lottery Fund is an important part of the Regeneration Agenda in Wales The Big Lottery Fund's mission commits us to bringing real improvements to communities, and to the lives of people most in need¹. We are ideally placed to

support the Regeneration agenda in Wales and contribute to the Welsh Government's New Regeneration Framework. As an intelligent funder, we focus on the impact that our funding can make and seek to fund those projects that are most likely to make a difference where it is needed.

1 <http://www.biglotteryfund.org.uk/wales/about-wal/missionvalues-wal.htm>

2.2 Involvement and support from the local community is crucial if regeneration activities are to truly succeed

Those projects that are supported by and involve the local community are more likely to succeed. The learning from our funding programmes, and from other organisations, highlights the importance of providing opportunities for local people to engage with and shape the projects we fund. Regeneration is as much about regenerating Vibrant and Viable Places: New Regeneration Framework The response of the Big Lottery Fund

the 'spirit and drive' of disadvantaged communities as it is about improving the physical environment. We suggest that the New Regeneration Framework contains a greater emphasis on this aspect of regeneration and that The Framework's proposed outcomes should contain a 4th Outcome to reflect this: *Involved Communities*. The Third Sector is particularly well placed to deliver this outcome.

2.3 The Big Lottery Fund can utilise its experience as a grant maker and funder to support the delivery of joint projects and integrated funding opportunities

We have the power to distribute funding on behalf of others. We've already used this to great effect by delivering both the Dormant Accounts scheme and Coastal Communities Fund in Wales. We have pioneered joint funding schemes by matching Lottery and European Social Fund money to support interventions designed to tackle economic activity through our Life Skills project. Through the Community Asset Transfer programme, delivered in partnership with the Welsh Government, we have contributed directly to the regeneration agenda by transferring redundant public buildings into community ownership, both helping to revitalise the physical and social aspect of communities. We are receptive to discussions on how we can support the delivery of regeneration funding in Wales.

2.4 The Big Lottery fund uses and endorses Results Based Accountability

We are encouraged by the Welsh Government's determination to use Results Based Accountability (RBA) to evaluate the projects supported through the Regeneration Framework. Like the Welsh Government, we are an outcomes funder and are interested in the difference that our funding makes to the lives of communities and individuals. We provide a self evaluation support service to our grant holders that is based on the RBA methodology.

3. Our contribution to the Regeneration agenda in Wales

In this section we outline our contribution to the Regeneration agenda in Wales.

3.1 With our commitment to bringing real improvements to communities most in need, we actively support the revitalisation of communities and individuals through the funding that we deliver. There is much in common between our strategic direction and that outlined in the Regeneration Framework's Vision and Outcomes. Our agenda is determined by broad policy directions issued to us by the Department for Media, Culture & Sport and the Welsh Government, which can be summarised as: Vibrant and Viable Places: New Regeneration Framework The response of the Big Lottery Fund people of all ages equipped with the skills and learning to meet the challenges of a modern society; people working together for stronger communities, social justice and better rural and urban environments; and the promotion of physical and mental well being.

We are about to be issued with new policy directions by the Welsh Government, although we do not anticipate a significant change in our priorities.

3 http://www.biglotteryfund.org.uk/prog_people_places

4 <http://www.awardsforall.org.uk/wales/summary.html>

5 <http://www.biglotteryfund.org.uk/wales>

6 http://www.biglotteryfund.org.uk/prog_community_asset_transfer?regioncode=-wal

3.2 Our flagship People and Places programme invests over £19m per year into

Welsh communities to deliver capital and revenue projects that encourage co-ordinated action by people who want to make their communities better places to live.

We require the projects to be community led so that they help people to develop the skills and confidence to become more involved in their communities. This demand led programme has three broad priorities. They allow communities to apply for funding of up to £1million to develop proposals that address local needs:

revitalising communities

improving community relationships

enhancing local environments, community services and buildings

3.3 We also have a smaller demand led programme, Awards for All Wales, that awards grants of up to £5,000 to support community activity, extend access & participation, increase skills & creativity and improve the quality of life⁴

3.4 You can find out more about our funding on our web site⁵. In addition to our demand led funding streams, we have also funded strategic programmes that make a direct contribution to the regeneration agenda:

Our Community Asset Transfer programme – delivered in partnership with the Welsh government - provided both capital and revenue funding to support the transfer of assets, such as land and buildings, from public sector organisations to community ownership. The purpose was to help communities become stronger and more sustainable by assisting them, through enterprising organisations that actively involve and benefit the communities they serve, to obtain and develop these assets⁶.

Vibrant and Viable Places: New Regeneration Framework The response of the Big Lottery Fund

Our Community Voice programme has recently made awards to projects that will build the capacity of citizens to engage in planning and running services and projects that respond to communities' needs and advance community benefit⁷.

⁷ http://www.biglotteryfund.org.uk/prog_community_voice

3.5 In the near future we will be making a further investment in Community Asset Transfer. We are also developing a programme to tackle poverty in Wales' most deprived communities that will support community responses to difficult economic and social circumstances. Our poverty programme will take both a people based and placed based approach to dealing with the causes and consequences of poverty, closely mirroring the key approaches that the consultation document outlines for the Regeneration Framework.

4. The importance of community involvement

In this section we address the following questions:

What is your feedback on lessons learned from delivery to date?

Should other national outcomes or principles be considered?

4.1 The key lesson that we have learned from delivering our funding is that community involvement is central to the success of the projects that we fund. You will see from the examples that we have presented here that the community has a central role in making our funding a success. Early next year we will publish the findings of a research study that considers the importance of involving our beneficiaries in the projects we support. We will happily share this with the Welsh Government once it is available.

4.2 Whilst we feel that the outcomes the Welsh Government prescribes for the Regeneration Framework are the right ones, we feel that it needs to include a specific focus on community involvement, which is a cornerstone of our approach to funding. The consultation document stresses the importance of community involvement, but this is not embedded in the proposed National Outcomes. We contend that regenerating and utilising social capital is just as important as the physical regeneration of communities.

4.3 *We suggest that the Welsh Government includes an additional outcome that highlights the important role of regeneration in fostering, creating and utilising community involvement: Involved communities.* Vibrant and Viable Places: New Regeneration Framework The response of the Big Lottery Fund

4.4 The Third Sector is well placed to deliver community involvement and we welcome the Framework's emphasis on Third Sector involvement.

5. Directing targeted funding and the potential role of the Big Lottery Fund

In this section we address the following question:

Do you have any comments on our proposals for how we will target and direct our funding?

5.1 We welcome the Welsh Government's recognition that there remains a rationale for targeting additional investment for regeneration over and above mainstream spending.

5.2 Partnership is a strong theme throughout the Regeneration Framework and we welcome this emphasis as it recognises that co-ordinated cross sector effort has more impact than organisations and agencies acting alone. However, the funding restrictions that often go hand in hand with statutory budgets means that need often goes unmet as the desired outcomes can only be addressed through projects that cut across sectors.

5.3 Consequently, our funding often addresses needs that would remain unmet if they relied on statutory funding. It is focused on achieving prescribed outcomes for communities.

5.4 We suggest that direct targeted funding for Regeneration is designed to support collaboration across the public, private and third sectors and that it can be accessed by all of these.

5.5 Whilst we understand the Welsh Government's wish to focus its limited regeneration investment on current evidence and behaviours likely to deliver successful regeneration we feel that this approach may restrict the scope for innovation. We take proportionate risks in relation to our funding that allow us to support a mix of tried and tested methods and riskier new approaches. A healthy appetite for proportionate risk is the hallmark of an intelligent funder.

5.6 We suggest that at least some of this investment is open to supporting untried and untested approaches as we feel this could support innovations in regeneration and add to the evidence base.

5.7 We welcome the Welsh Government's emphasis on combining Regeneration funding with other funding streams like ERDF to deliver Vibrant and Viable Places: New Regeneration Framework The response of the Big Lottery Fund

integrated holistic projects to deliver maximum impact. In particular, we note its desire to:

align match funding opportunities;
reduce project management & administration costs;
collaborate across boundaries and sectors; and
reduce the potential for duplication of activities.

5.8 This resonates with the Auditor General's recommendations for the Welsh Government relating to Grant management in Wales⁸ and offers the Welsh Government the opportunity to enhance the distribution of Regeneration funding by utilising the services of our distinctive non-Lottery funding arm 'Big Fund'⁹.

⁸ http://www.wao.gov.uk/assets/englishdocuments/Grants_Mangement_English.pdf

⁹ <http://www.biglotteryfund.org.uk/index/about-uk/big-fund.htm?fromsearch=-uk>

¹⁰ http://www.biglotteryfund.org.uk/prog_sustainable_steps.htm?regioncode=-uk

¹¹ http://www.biglotteryfund.org.uk/prog_getting_ahead.htm?regioncode=-uk

¹²

http://www.biglotteryfund.org.uk/prog_coastal_communities_fund.htm?regioncode=-uk

5.9 The National Lottery Act (2006) gave us the power to handle non-lottery as well as Lottery funding. Our experience, infrastructure and expertise position us to be able to deliver wider community funding over and above that generated from the Lottery Pound. We distribute funding on behalf of other agencies through 'BIG Fund' and in Wales, we are already distributing funds on behalf of the Welsh and UK Governments:

money from dormant bank and building society Accounts through the *Sustainable Steps*¹⁰ and *Getting Ahead*¹¹ programmes; and the Coastal Communities Fund¹², money to support the economic development of coastal communities by promoting sustainable economic growth with money generated through the Crown Estate's marine assets. Through our work on the Coastal Communities priorities for Wales we enjoy a good working relationship with the Welsh Government's Regeneration Policy Team.

5.10 In Wales we have used our non-Lottery powers to pioneer the delivery of joint schemes, combining lottery and non-lottery funding to maximise strategic impact and add value to our Lottery portfolio:

The Community Asset Transfer Programme is jointly funded with the Welsh Government and is supporting the transfer of viable public buildings to community ownership

Vibrant and Viable Places: New Regeneration Framework The response of the Big Lottery Fund

Our Life Skills Project¹³ broke new ground by combining European Social Fund money with Lottery funding to deliver interventions designed to support hard to reach groups back into work or training.

¹³ http://www.biglotteryfund.org.uk/prog_life_skills_project.htm?regioncode=-uk

¹⁴ http://www.biglotteryfund.org.uk/er_eval_explaining_the_difference.pdf

5.11 In relation to all of these we have brought our grant making and grant management expertise to bear by developing, delivering and managing these programmes on behalf of our partners.

5.12 *We would welcome further discussions with the Welsh Government about delivering Regeneration funding in Wales where we can add value to our work, or where we can maximise strategic impact through joint funding initiatives.*

6. Results Based Accountability

In this section we address the following question:

We want to ensure effective monitoring and evaluation of regeneration activities; will the approach set out achieve this?

6.1 We fully support the Welsh Government's intention to monitor and evaluate the implementation of the Regeneration Framework using the Results Based Accountability (RBA) approach. As an intelligent funder, we fund outcomes rather than activities. Our main purpose in funding a project is to help achieve agreed outcomes, or changes that will make a difference to communities and people in need. We also recognise the importance of supporting our funding recipients to learn from the experience of running a project.

6.2 As everything we do is geared towards achieving outcomes that improve our beneficiaries' lives, we place a strong emphasis on measuring the extent to which our programme and project outcomes have been achieved¹⁴. As a result we: are clear about the outcomes we want each programme and project to achieve, the targets against which they will be evaluated and the context within which they will be achieved; and Vibrant and Viable Places: New Regeneration Framework The response of the Big Lottery Fund guide our funding recipients so that they focus on outcomes.

6.3 RBA provides a convenient, clear and accessible framework that lends itself to our outcomes approach. We have embraced RBA in the support that we offer our grant holders through our self-evaluation support contract by making it an integral element of the support. We feel it offers an uncomplicated framework that can be used by all sectors.

6.4 As well as promoting its use to our grant holders we are stressing its benefits to our stakeholders and partners. To that end, we are convening a round table discussion in February 2013 that will draw together representatives from the statutory and third sectors to consider how RBA is being used and how it can be promoted more widely across Wales.

7. Further information

24. RCT People First

Questions Q 1. What can we learn from the things we have already done?

- * Involve people to make it better
- * Include everybody
- * Everybody should know what is going on
- * Public meetings should be held

Q 2. Our Vision : Are there other things we should do?

- * We need jobs for everybody who wants to work that includes people with learning disabilities
- * Encourage businesses to come to the valleys to create jobs
- * Support businesses to create jobs

Q 3. Are there other things we could do to work with others?

- * Make everything accessible
- * Make things simple language
- * Provide funding to third sector to continue to work with communities
- * Stop educational cuts in order to improve learning as this makes people more employable

* Stop health cuts and increase funding to support health and well being as this improves confidence and self esteem and enables people to join in community activities, volunteering and eventually join the labour market.

Q 4. Do you think having 3 regions is a good idea?

Can you think of other things we could do?

Yes these groups should feed into each other

Q 5. What do you think about our ideas about what projects to fund??

Can you think of other things we could do?

* Make sure that you involve people with learning disabilities and that information is easy read

* Ok if the money there

* Funding is needed to support self advocacy as this helps communities to advocate for others to ensure they have their voices heard

Q 6. What do you think about the way we want to check the results?

Are there other things we could do?

* Will everybody get to see a report?

* Will everybody get a chance to give their views?

Will it be in easy read?

Will all versions be released at the same time to allow the same time scale for consultation?

Will you consider people with learning disabilities from the beginning?

Please add any other comments. We look forward to hearing from you.

Please can you ensure that when you release future consultations that easy read versions are released at the same time to allow the same time scale for those with learning disabilities to voice their opinions.

There were 6 people with learning disabilities taking part in this consultation document it could have been a lot more.

Thanks

RCT People First Limited

25. Cwm Taf Health Board

See separate document

26. Rhondda Cynon Taff County Borough Council

Response to the "Vibrant & Viable Places: New Regeneration Framework"
Consultation Document: Welsh Government

January 2013

Introduction

Rhondda Cynon Taf County Borough Council welcomes the opportunity to comment on the Vibrant & Viable Places consultation document. A well thought through regeneration policy is of paramount importance to communities in Rhondda Cynon Taf and Wales as a whole. Wider economic fragility and consequently reduced private sector investment and confidence further reinforce the need for a shared and focussed National regeneration policy. The communities we serve have much potential for regeneration and economic growth, and it is important to maximise these opportunities. If an appropriate approach is taken forward then shared objectives can be achieved leading to more prosperous and vibrant future.

- The principles of a new regeneration framework for Wales focussing on vibrant and viable places aligns itself well with the development of a new Economic Regeneration Strategy and a Single Integrated plan, 'Delivering Change' for Rhondda Cynon Taf. Both of these focus on the importance of increasing employment and prosperity in the area by developing people and places. One of the three main themes that the Single Integrated Plan will concentrate on is developing prosperity while the Economic Regeneration Strategy will focus on key priorities to develop the local economy including Regenerating Town Centres and Supporting the Growth and Development of Local Businesses. This means that we have a strong set of locally set priorities which will be able to be used as a basis in translating the new regeneration framework into delivery in our area. It is also important to recognise the work that is currently under way in South East Wales to set a framework of regional development priorities which is being led by the ten Councils in the area. Again this will provide for a shared strategic approach to developing projects and initiatives that will deliver regeneration. To support this approach regional collaborative planning is already underway in South East Wales led by local government to prepare for the next round of EU Structural Fund Programmes that are due to begin in 2014.
- The principles for regeneration presented in the consultation document are important in the delivery of a robust regeneration policy. Recognition of the role of partnership working is important, as only together we can tackle the challenges and maximise the opportunities presented. Within Rhondda Cynon Taf we have already demonstrated success of working in partnership to deliver innovative and strategic regeneration schemes. The delivery of town centre regeneration proposals in some of our strategic towns have been undertaken as part of a collaborative effort across Valleys authorities, sharing best practice and developing proposals with shared aims and objectives.
- Joined up delivery is essential to the successful delivery of the new policy framework that will include contributions from all organisations with a role to play in development and delivery. Effective planning is also an important principle to apply to successful delivery and a regional overview can be extremely useful in this. But great care needs to be taken in not introducing additional tiers of bureaucracy at a regional level. Any regional structures that deal with the new regeneration framework should build on existing structures wherever possible and sit jointly with other Welsh Government policy developments which are also proposed to be administered on a regional basis such as the City Region and

Communities First The regional development framework being led by the South East Wales Councils reporting to the WLGA Regional Board mentioned earlier is an important element of existing regional working that should be used to support the new regeneration framework.

- The Welsh Government's recognition that the public sector is an important partner in the successful delivery of regeneration is integral, and as stated in the consultation document 'local authorities are often the lead body in the coordination of economic development, regeneration activity and tackling deprivation at a local level'. The delivery of regeneration at regional and national structures however, is something that needs to be given careful consideration working alongside local government, with the detail jointly agreed. There are often particular local needs or circumstances which require local approaches to deliver successful outcomes.
- The development of a people and place based approach to regeneration is referenced in the consultation document, and is clearly required to tackle the embedded socio-economic issues that exist in our most deprived communities. There should however be recognition that each and every initiative needn't try to tackle every issue, and that the delivery of focussed, but coordinated initiatives as part of a wider strategic approach can also deliver significant benefits for communities.
- Regeneration of communities in Rhondda Cynon Taf, and throughout South Wales, is becoming increasingly dependent on the role and function of our town centres. We clearly recognise that our town centres do not just provide a retail function, but have a much wider remit, as places of employment, places of cultural identity and distinction, places where people can learn and develop their skills, and places where people can access important services. Diversified town centres have the potential to drive our local economies, and to improve the quality of life for the settlements they serve. Continued support from the Welsh Government will be essential in the transition of town centres from their traditional role, to hubs of economic growth.
- The proposals for directing targeted funding for maximum impact and leverage rightly emphasise the importance of a robust evidence base and sound priority setting and business cases which set out the cost benefit of delivery. But this process needs to be proportionate to the likely resources that will be available and build on existing approaches at a local and regional level that are already in place. It is important to focus our capacity on activity that will achieve maximum impact rather than to replicate or overlap existing activity. The new framework will be most effective if it relates closely to the local and regional work in South East Wales mentioned earlier. This is particularly important if we are to maximise the leverage and impact of the regeneration funding alongside other national and local sources of funding including those from other Welsh Government Departments, EU Structural Funds, lottery, local government and the private sector. This will be essential at a time when finance for regeneration is contracting alongside public expenditure generally. In a time of increasingly scarce resources the need for collaboration and ensuring value for money is more important than ever, and should be embedded in the principles of regeneration initiatives. This is something we have also endeavoured to do, and have successfully used funding

from the Heads of the Valleys Strategic Regeneration Area to lever in further funding from the European Regional Development Fund, Heritage Lottery Fund, private sector, and of course the Council's own resources.

- We agree with the prominence the consultation document has given to evaluation, particularly due to the need to ensure that finite resources deliver the best value for money. Embedding evaluation into projects, from inception, through to post project evaluation is something that the consultation document aspires to achieve. We have recognised this for some time, and have led the way in the evaluation approach of strategic town centre regeneration schemes, initially establishing detailed baseline, prior to monitoring progress using a variety of tools that gather information from the wider community and the private sector. This approach has subsequently been rolled out by a number of other local authorities in their evaluation of town centre regeneration initiatives. We would be happy to share the lessons we have learnt, and to disseminate best practice with colleagues from the Welsh Government.

Conclusion

Vibrant and Viable places is a broad document, that encompasses a wide range of the opportunities that we collectively need to capitalise on to regenerate our communities. The key to successful delivery, and maximising opportunities, is of course within the detail, which will inevitably develop from the consultation responses. It is imperative that this detail is developed working closely with local government to ensure that there is alignment and collaboration, and I look forward to Rhondda Cynon Taf Council's further involvement through the WLGA, and of course directly. The Welsh Government's framework for regeneration delivery is keenly awaited.

27. Keith Young

There are a number of factors that are holding Wales back for example the amount of rules and regulations coming out from Welsh Assembly . I live in Fishguard and have done so for 60 years and this is the most depressed town i Pembrokeshire i have never seen it so bad. The policies that you are churning out are crippling towns across Wales. I work in the construction trade and the policies you have implemented have all but killed off the trade there are the codes for sustainable homes the bar you have set is far too high. There is the 106 agreement several years ago this would have been called bribery. Tesco were in discussions to come to Fishguard the talking took four years you wanted them to build a new school pay for the one way improvements of the town and what did you get out of it nothing because Tesco pulled out of the negotiations another blow for Fishguard. You cannot grasp the fact that businesses are run by self motivated people they work hard by putting long hours and good ideas into their businesses something that is not possible in the public sector it aggrieves you to think that a business makes a profit well that is what motivates these people to succeed, its called positivity, There is not a capital project that has been completed on bud jet by the Welsh Assembly. You will not get businesses to come to Wales with the policies you have in place at the moment they are not working for Wales you need to work with businesses and learn how these people become successful instead of strangling them with huge business rates and reams of red tape, Every thing has to have a certificate or a badge attached to it. There are 22 county councils in Wales a Welsh assemble plus the thousands of

people it takes to run these empires we have only got a population in Wales of 3.5 million people in comparison there is one County Council in Birmingham with a population of 6 million people Wales is like a huge department store with more staff than customers the present level of bureaucracy is unsustainable now that the bubble has burst you are cutting the most necessary services in Wales rather than doing the right thing and cutting from the top of your empires you are becoming a luxury that we cannot afford you will end up bankrupting us.

28. Pembrokeshire the Haven Business Panel

Response of the Panel to the Welsh Government's Consultation on Vibrant & Viable Places – New Regeneration

The Pembrokeshire the Haven Business Panel was established in 2006 to ensure that the views of the business sector were fed into the development, delivery and review of the Wales Spatial Plan in the Pembrokeshire the Haven area. The panel now acts as the key channel between the business sector and Pembrokeshire County Council through the Pembrokeshire Community Plan and has links with the South West Wales Economic Forum.

The panel consists of nominated representatives of business organisations and representatives of key business sectors in the county. A list of members is attached.

The response of the panel to the consultation is as follows:-

1. Integrated spatial and community regeneration has an important part to play in improving well-being in deprived areas of Wales; but evidence shows that a strong and diversified economy is a prerequisite of regeneration and provides the employment that underpins a viable and sustainable society. Policies targeted at areas are unlikely by themselves to secure long lasting improvements to the socio-economic outcomes facing individuals. The Government must not put the cart before the horse.
2. Although driven by Government policy and funding, the delivery of regeneration initiatives is essentially a local issue. The introduction of a regional level (and perhaps a sub-regional as well) with regional (and perhaps sub-regional) strategic plans and regional (and perhaps sub-regional) regeneration boards will do little other than introduce additional tiers of expensive and time-consuming bureaucracy. Cross boundary collaboration between local authorities and stakeholders in areas with potential for regeneration is sometimes essential, but imposing prescribed collaboration arrangements just to fit existing local authority partnerships makes little sense given the wide variety of regeneration initiatives.
3. Serious consideration should, wherever appropriate, be given to the establishment of arms length specialist regeneration delivery bodies which could distance decision making from government and promote less risk aversion, faster development times and easier relationships with private sector investors.
4. Comprehensive partnership, involving public, private and third sector organisations, and engagement with and involvement of local stakeholders are essential for effective delivery. The panel welcomes the recognition of the importance of joined up planning and delivery across government departments and hopes that this aspiration will be taken on board in both spirit and deed by officials.

29. Winning Pitch

See separate document

30. One Voice Wales

Vibrant and Viable Places

Response from One Voice Wales

Introduction

One Voice Wales is recognised by the Welsh Assembly Government as the national representative body for community and town councils in Wales. It represents the sector on the Local Government Partnership Council and over 70% of the 735 community and town councils are in membership. As well as our representative role, we also provide support and advice to councils on an individual basis and have previously launched, with Welsh Government support, a modular training programme for councillors. We believe strongly that community councils are well-placed to develop the economic, social and environmental well-being of the areas they serve and, as such, are active and proactive in debating key issues such as energy policies, environmental issues and strategic planning. Our sector will support and wish to participate in much of the locally based aspects of this approach, and it is hoped that our members will be invited to and attend the forthcoming summit and workshops to progress this agenda further.

Whilst individual councils, indeed individual members, may submit responses directly in respect of this consultation, this collective response is made on behalf of the sector as a whole.

General Comments

The sector is supportive of this consultation exercise. We are confident that the reflections emerging in the light of the various studies and initiatives as outlined in the consultation documents will prove useful in the promotion of this new approach to stimulating our economy. Community and Town Councils throughout Wales will contribute as effectively as they can in supporting new and existing enterprises, in particular those that are community based and which provide positive attributes towards the life and vibrancy of local communities in general. The Government itself is stressing that partnership is vital, and the sector concurs that this is particularly important at the local level of approach.

Key Questions

1. What is your feedback on lessons learnt from delivery to date?

There continue to be a variety of lessons emanating from the many initiatives that are or were in place to support economic growth. For instance, the work stemming from Communities First initiatives have stimulated some good outcomes, although this very initiative has greatly frustrated those communities that are in dire need of this kind of support but which are just marginally outside the qualifying frame for participation. New approaches are evolving as a result of the feedback from previous initiatives, such as the proposals to create City Regions in order to stimulate growth. These are lessons well learnt. It is felt that a multi-level approach to developing and

supporting initiatives will be essential over the coming years. Lessons from the Blaenau Gwent Effect project, for example, show that quite often the effectiveness of a local facilitator or agency can be greatly enhanced by a limited amount of specialist support from a central source.

2. Should other national outcomes or principles be considered? These three outcomes are considered to be the most important against which the success of this approach should be judged. The overarching outcome of sustainability is also a key issue for us all.

3. What more can be done to achieve greater coherence and cross cutting action across departments? It should be ensured that all agencies are able to participate fully in this economic agenda, from large organisations such as universities down to individual community groups such as local councils, who will assist in promoting the often necessary “buy-in”, referred to in the report.

4. Do you agree with the national, regional and local approach set out? This is where our sector will come into its own. Each local council and in turn each community will know and be engaged in the attempts to stimulate and sustain the economy in the surrounding area. Community and Town Councils have a small range of statutory and financial influence, which might in certain instances be brought to bear in providing direct economic benefits to their communities, but they will certainly have a much wider indirect contribution to make in this regard. Notwithstanding any commercial sensitivities attached to new initiatives, local councils would often be in a position to lend support to many such plans or discussions at an early stage in their evolution. Members of local councils will often be in a position also to act as useful conduits for information gathering and dissemination, and the Welsh Government is urged to include reference to the sector in its three-layer approach, specifically at the local level of development.

5. Do you have any comments on our proposals for how we will target and direct our funding? We are generally supportive of the elements listed in this approach.

We want to ensure effective monitoring and evaluation of regeneration activities; will the approach set out achieve this? The success of the monitoring and evaluation tasks will be dependent upon the clarity of setting and recording key outcomes and achievements. It will also be dependent on those individuals engaged in the reflective processes, and on how this evaluation will be translated into positive effect within the overall scheme.

31. Isle of Anglesey County Council

WELSH GOVERNMENT VIBRANT AND VIABLE PLACES NEW REGENERATION
FRAMEWORK CONSULTATION

January 2013

The Isle of Anglesey County Council (IACC) welcomes the opportunity to respond to the above outlined consultation document. The document is comprehensive and provides an ambitious framework for the Welsh Government’s future regeneration activities.

What is your feedback on lessons learnt from delivery to date?

The IACC lessons learnt from delivery to date are based upon our strategic and operational experiences of the Môn Menai Regeneration Programme over the last 5 years. The Programme has established important principles for successful regeneration and against this backdrop the IACC would make the following key points:

1. Recognise the considerable positive added-value opportunities created by Regeneration Area status and fully support the objectives of the Regeneration Programme.
2. Regeneration Area Funding has been vitally important as match-funding source for EU Programmes to deliver maximum impact and benefit, and should continue to be in the future.
3. Future availability of revenue and development funding within the Regeneration Programme will influence the type and quality of projects (including the outcomes and impacts generated).
4. The lack of a co-ordinated internal Welsh Government approach within the Regeneration Area has been problematic (in particular the lack of engagement and communication between WG Departments).
5. The Programme has encouraged positive commitment to 'soft' collaboration and partnership working between LA's and other partner organisations.
6. Despite whole-Island inclusion in the Regeneration Area, interventions have been primarily targeted at the greatest needs and opportunities.
7. Inward Investment and/ or indigenous job creation underpins successful regeneration. This should be recognised.

Should other national outcomes or principles be considered?

The IACC fully supports the Welsh Government's vision to ensure that 'everybody in Wales should live in vibrant, viable and sustainable communities with a strong local economy', however it is vital to recognise that the approaches to regeneration vary considerably between urban and rural/ peripheral areas. Against this backdrop the IACC would make the following comments:

1. It would be beneficial to define 'poverty' (and other key terms) at this point;
2. The outcomes and associated activities are not SMART. How will they be measured within current monitoring/ performance management arrangements?;
3. Can the stated outcome be realistically achieved with the available budget and current WG cross departmental working arrangements? Despite being laudable, considerable organisational development within WG is required if they are to be achieved;
4. It is unclear how Regeneration and Economic Development Outcomes of the WG differ/ complement each other. This causes confusion and conflict. It is essential that the outcomes are consistent in other strategic documents. (e.g. health, housing etc.);
5. There is no outcome which relates specifically to rural communities – we believe that this is a major omission.
6. Outcome One 'Prosperous Communities' includes 'well connected communities supported by transport and broadband connections' – this should also include Wi-Fi and reliable mobile phone coverage including 3G and 4G;

7. We suggest that the regeneration opportunities associated with 'capitalising upon major energy infrastructure projects' needs to be included within the range of supporting outcomes at local level.

What more can be done to achieve greater coherence and cross cutting action across departments?

The IACC agrees that successful regeneration delivery is characterised by partnership with each sector having a key contribution to make. The IACC would make the following comments:

1. It is essential to both clarify what economic development outcomes we want, where and how. Once clarified, they can be applied to a number of 'regeneration' related areas within the WG and other organisations;
2. The Portfolio, Programme and Project Management Officer for Government Commerce approved model, which provides a framework to assess current performance and put in place improvement plans, should be applied to the 'regeneration' area to achieve better synergy and alignment;
3. The co-ordinating functions must be allocated to specific officials. The roles and responsibilities of Welsh Government Regeneration Area Officers should be better defined;
4. One regeneration 'Benefit Realisation Plan' is required within WG demonstrating clearly how all Departments will contribute towards the desired outcomes.

Do you agree with the national, regional and local approach set out?

The development of a clear transparent delivery structure is a necessity before reviewing regional co-ordination and local delivery approaches. Against this backdrop the IACC would make the following comments (please also refer to lessons learnt as outlined in question 1):

1. Regional Boards must be aligned with existing structures at regional e.g. North Wales Economic Ambition Board and county e.g. Anglesey Economic Regeneration Partnership. The potential role of Town and Community Councils should also be considered, given that they are locally based public bodies with the ability to raise domestic rates;
2. It is very hard to consider the appropriateness of the collaboration structures being proposed without having draft Terms of Reference;
3. The proposed regional structures are not aligned with defined spatial areas for Post 2013 Structural Funding Programmes. This will make the complex strategic planning and delivery discussions even more difficult;
4. Capacity does not exist within the Isle of Anglesey County Council, as with other Local Authorities to support new collaboration structures. Those already in existence must be used more effectively;
5. It is also questionable as to the appropriateness of what is proposed during time of reduced resources, capacity and expertise across all organisations – the focus of time and resources should be on delivery of interventions at local level;

Do you have any comments on our proposals for how we will target and direct our funding?

The IACC agree that the new regeneration delivery model must be able to evidence that investment is made to ensure greatest impact. Against this backdrop the IACC would make the following comments:

1. The document lacks clarity on the future of existing Regeneration Programme Areas – do these existing Regeneration Programme Areas have a future? The document should clarify this;
2. The IACC believes that continued spatial concentration of efforts and resources is still required, with a focus on communities where added-value outcomes and impacts can be created;
3. The IACC supports the continuation of Regional Regeneration Programme Areas and strongly believes that Anglesey has a strong case to maintain this status on the basis of both needs and opportunities;
4. Further clarity is requested in terms of how limited funding would be balanced between communities/ areas of 'need' and communities/ areas of 'opportunity';
5. The recognition of the need for revenue support to develop interventions/ projects is clearly welcomed;
6. Availability of EU Post-2013 Structural Funding has not been considered as justification for 'targeting funding'. Better alignment between the Regeneration Frameworks and EU Post-2013 Operational Programme is required;
7. Recognition that EU funding provides considerable match funding opportunities is welcomed. Will the Welsh Government look to match funding at source – leaving limited Local Authority (and other external organisations) ,limited capacity to focus on project development and delivery?
8. Competition will exist on regional boards to secure funding - with such limited funding will this be conducive and underpin effective collaborative working?

We want to ensure effective monitoring and evaluation of regeneration activities, will the approach set out to achieve this?

The IACC welcome an outcome/ evidence based approach and would make the following comments:

1. The IACC believe that the Welsh Government, as the strategic body, should take a lead on policy / strategy/ monitoring/ benchmarking/ promoting best practice, working in conjunction with the WLGA and regional partnerships (e.g. North Wales Economic Ambition Board);
2. Local Authorities role in local co-ordination and delivery of interventions is essential, utilising expertise, knowledge and capacity;
3. Propose that any monitoring and evaluation systems are reviewed by the Wales Audit Office to ensure synergy and alignment with tools and processes already in use amongst most Local Authorities and other organisations. From a resources and effectiveness perspective it is essential to ensure that we are not reporting upon the same outcomes more than once using different tools;
4. It is essential to increase evaluation capability and expertise within the public sector. Due to the reduced public sector resources we cannot continue to tender/ commission the private sector in relation to every project and programme activity;
5. It is also essential to recognise that the impacts may not be visible immediately and a long term approach is needed;
6. The IACC welcome the introduction of a Regeneration baseline for each locality which can then provide the basis for regional prioritisation;

32. Newport City Council

Consultation on Vibrant and Viable Places – New Regeneration Framework
Newport City Council welcomes the opportunity to comment on the Welsh Government's proposals for the future of regeneration in Wales. At a time of diminished resources and bleak economic forecasts, it is vitally important regeneration is rationalised and targeted in an efficient and effective manner. The way we work, live and play has changed, and the relationship between people and places is critical to the success of Wales as a nation. A regeneration framework that consistently delivers prosperity will be an important driver of this success - if clarity, vision, ambition and efficacy are features of the approach.

1. What is your feedback on lessons learned to date?

The lessons learned to date on delivering regeneration in Wales are characterised by the economic dilemmas facing the nation, and a long term, effective and rationalised approach is needed to address these.

Firstly, the comparative weakness of the Welsh private sector is a significant limitation to regeneration in Wales. There is a lack of real private sector involvement in the various public sector regeneration programmes which is compounded by the limitations of Local Authorities/Local Service Boards, who as public bodies are not always best placed to effectively drive forward economic development. Whilst the private sector is not a panacea for Wales' structural economic weakness by any means, globally the most successful regions make the most of partnership opportunities between the public, private and third sectors in a way that has been lacking in Wales. This is perhaps because of the lack of large Welsh-domiciled companies that have the capacity and need to invest in Welsh people and places. Secondly, there are numerous other limiting factors, such as land acquisition and availability, or the sometimes strict limitations of funding conditions that mean regeneration professionals are not free to target activity in a way that is considered to maximise outcomes. However it could be said that the most beneficial projects are bigger than a single local authority area whilst funding is often narrowly targeted at reversing decline at a local level. Despite the notable successes detailed in the Vibrant and Viable Places document, it should be recognised that a piecemeal approach to regeneration and economic development has been seen in Wales as a result of the link between regeneration funding and relative deprivation. Targeting regeneration money at deprived communities has had some undeniable success, but may not be the best method to bring opportunities to these areas. The most deprived areas in Wales are largely the same areas that were the most deprived ten years ago, or longer.

For example, whilst the regeneration funding provided by WEFO / Welsh Government in the Pillgwenlly area of Newport is most welcome, there are serious structural problems in the city that affect the prosperity of all its residents, and the city centre in particular is struggling. Though Pill is the most deprived ward, there are arguably projects in the city centre that could be prioritised over this ward-level initiative that would provide city-wide, if not regional, benefits that would also directly improve the lives of Pill residents as a whole. The key is finding a way to link the two.

A limitation of regeneration in Wales has been the need to spread funding too thinly, creating an introverted system where even connected and mutually dependent areas do not collaborate in achieving regeneration outcomes. For example, Caerphilly County Borough Council has currently made the town of Bargoed the focus of its regeneration efforts. Bargoed provides around 1,000 jobs to Caerphilly residents,

while nearly twenty thousand people commute out of the authority to Cardiff and Newport daily. It is not even currently possible to travel to one of these major employment centres by a direct train. The economic issues around regeneration are bigger than individual local authorities are able to address, and we welcome the recognition of this fact in the document.

Whilst many of these challenges relate as much to infrastructure and social capital as they do to physical regeneration, moving forward under a holistic approach it will be important to learn these lessons. It could be said that Regeneration, as part of the wider economic development, has been curtailed due to the lack of involvement with the private sector, linking funding to deprivation and the individualistic approach to development taken between the twenty-two local authorities. Shifting the focus of regeneration towards a more regional and collaborative model may offer a more focused solution.

2. Should other national outcomes or principles be considered?

The comment in the definition on supporting areas where market forces will not deliver prosperity without government support is interesting as the case can be made that regeneration potential has not been realised because government support cannot deliver prosperity alone without support from the marketplace. Newport City Council agrees that Wales needs greater equilibrium between its sectors if all are to thrive.

Welsh Government is best placed to sponsor research to determine which sectors are geographic 'clusters' offer the best prospects for future jobs growth. This could also determine what (if any) public sector intervention would be helpful to boost or facilitate that growth if the market is not operating at an optimum level.

3. What can be done to achieve greater coherence and cross-cutting action across departments?

Given the range of sectors, departments and organisations involved in regeneration, and the wide-reaching remit of each, often involving aims and objectives that are removed or in opposition to regeneration outcomes, it is difficult to see how true coherence can be achieved between departments if left to their own devices. No one sector can orchestrate solutions to economic decline in isolation, and the myriad ways in which the regeneration agenda intersects with the statutory and non-statutory responsibilities of the various bodies renders achieving coherence and cross-cutting success very difficult where accountability for delivering regeneration outcomes is so splintered.

To address these limitations, attention should be given to the way such entities operate and co-operate in successful cities around the globe. Two key features successful regions share are that they enjoy relative autonomy and accountability in terms of their activities and programmes, and also demonstrate an equitable relationship between stakeholders. Whilst we agree that the Welsh Government should retain ultimate accountability for the delivery of strategic regeneration across Wales, Newport City Council would argue that achieving coordination across regeneration and economic development activity is premised on local organisations having the freedom to act and target resources at projects with the greatest benefit for local people and places.

Building on the examples provided in this review, Newport City Council suggests that careful structuring of the composition and powers extended to the local delivery agencies proposed as part of this review may provide the best means of coordinating activity, so long as sufficient decision-making power is extended to the proposed regional boards that they can coordinate and effectively manage regeneration in their

areas fairly. Newport City Council also agrees that it is imperative that the regional boards attract their membership from as wide a range of stakeholders as is appropriate to allow proper coherence between sectors and activities. As stated in the consultation document, a stronger collaboration with the new Communities First clusters will be essential in the future to not only benefit from economies of scale, but also to maximise the impact on communities or jobs growth. Finally, a key feature in developing a coordinated and coherent approach to regeneration, is by ensuring that appropriate and extensive use of the evidence base is fundamental to decision-making to minimise previous haphazard arrangements. The process of evaluating evidence should be stringent and rigorous to become an established business practice for regeneration boards and their constituent partners.

4. Do you agree with the national, regional and local approach set out? Newport City Council supports the view that the proposed regional board for governing regeneration delivery is the key variable; linking the enabling position of the Welsh Government with the main delivery bodies at local level. As recognised, the economy does not observe the artificial boundaries of local authorities, and a more regional emphasis – if constituent partners are willing to trade off individual benefits for the greater good of the region – can be a crucial catalyst for delivering better outcomes. However, there may be a danger that a regional approach to the economy proves to be too large, as our cities may not possess the size to drive prosperity across their entire hinterland.

It is not clear from the consultation document what structure is being proposed, or how the many different tiers and policy initiatives that are emerging at regional, sub-regional, and local level all mesh together. Newport City Council would emphasise that any approach to regeneration and wider prosperity must recognise and understand the ways in which people and places interact from a functional and realistic perspective. Identifying the correct level at which activity should be governed is more important than the way the governance of regeneration operates in itself. Much of the interaction between people and places relates to sub-regional economies – travel to work, accessing retail and leisure opportunities, procuring goods, and intra-regional migration. Functional economies are smaller than the level proposed for the regional boards; for example, whilst the South-East of Wales has clear economic issues that cover the entirety of the ten authorities, it also has several sub-regions delineated by functional economic relationships - Cardiff proper (including the Vale, Bridgend, and RCT), Newport and South Gwent, and several smaller, peripheral areas to the north that are isolated from the more urbanised south. Therefore delivery will need to remain flexible to local need.

5. Do you have any comments on our proposals for how we will target and direct our funding?

Leveraging funding into Wales – an economically struggling area – whilst de-coupling the nation from its reliance on deprivation to attract investment, is a key challenge, requiring creativity and boldness. In order to more efficiently target resources at the appropriate (sub) regional level, and move away from perverse incentive of greater deprivation levels equating to greater funding, each regional board must have a degree of flexibility to effectively target regeneration to meet the overacting Government objectives.

Similarly, each project should be freed as much as possible to investigate the maximum possible array of funding streams rather than being confined to a prescribed framework that targets funds, whether via pooled budgets, asset-backed finance or retained business rates. With resources scarce the full range of

possibilities will need to be exploited; it is insufficient to rely, for example, on European funding to underwrite the future regeneration of Wales. Whilst it is difficult to fully comment on this question without seeing the Welsh Government's proposals for how the funding formula will be structured, it is clear that any formula will need to chart a difficult course between demonstrating equitable distribution between the regions on one hand and realistically targeting limited amounts of funding to the areas where the greatest benefits can be gleaned on the other. Newport City Council would strongly support the inclusion of measures such as prospective GVA, business rates, jobs and qualification growth to strongly feature in any funding allocation formula alongside consideration of relative deprivation. In addition to the funding streams identified in the document, Newport City Council recommends that the Welsh Government gives careful consideration to the way in which future regeneration can exploit flexible use of business rates within each regional board area; for example, by opening up opportunities for the retention of a proportion of the rates generated through regenerated sites or enabling local government borrowing on the strength of increased revenue arising from high-value developments. This will incentivise success and remove the need for successfully regenerated areas to continue to chase funds after their completion as they will have the potential to generate their own finances.

6. We want to ensure effective monitoring and evaluation of regeneration activities; will the approach set out achieve this?

Newport City Council would like to make two points here. Firstly, if we are more rigorous in the way we apply the evidence base to targeting funds we will reduce the monitoring burden – picking the right projects will go a long way towards ensuring the right outcomes for the right people in the right places are delivered in Wales. Secondly, the Welsh Government could consider the ways in which delivery of regeneration outcomes links in to any funding formula proposed. We have covered some of the ways this might be achieved in answering the previous question but we believe the carrot of retaining the financial benefits arising from successful regeneration projects would significantly galvanise efforts and partnership across sectors.

Yours sincerely
Susan Bolter
Head of Regeneration and Regulatory Services

33. Stevens and Associates

RESPONSE TO CONSULTATION DOCUMENT
“VIBRANT AND VIABLE PLACES – A NEW REGENERATION FRAMEWORK”
by

PROFESSOR TERRY STEVENS
FOUNDER AND CEO
STEVENS & ASSOCIATES³

10th January, 2013.

NEW WAYS TO DELIVER BETTER OUTCOMES

We welcome the ambition set out in this document.

We encourage the development of a new vision for Wales as country with vibrant and viable places.

There is certainly a need for a fresh approach and finding new ways to deliver better business.

These tough economic times are a perfect stage to instil an imaginative, dynamic and fresh approach to regeneration. This is a time for a new style of approach. These are times that require hybrid solutions and hybrid solutions ONLY come from hybrid thinkers.

The deeply ingrained comfort zones within which many involved in regeneration reside must be given a thorough shake up if Wales is to move forward and become competitive.

Systems must also change. There is far too much fragmentation, duplication and a real need for an integrated approach. And, Wales is not short of funding. There are millions of pounds available through various EU and Government schemes, it is just that it is not being harnessed and used effectively.

Our recent experience in organising the “Resurgence: Riding the Wave of Success” maritime heritage conference (October, 2012) highlighted that there are over 80 organisations and agencies in Wales involved in this sector yet, until Maritime Heritage Wales Ltd⁴ convened the conference, had no shared meeting ground – no one had taken the lead to coordinate activity.

THE NEED FOR INNOVATION

The recognition of the need for innovation is applauded however, innovation applied to regeneration in Wales has been an alien concept. This must change and the Minister should take urgent steps to establish an innovation initiative that nurtures fresh thinking but MORE IMPORTANTLY allows innovation to flourish.

This will mean talking risks, challenging existing systems and regulations and involving new ‘voices’. All of which will make many of those currently involved nervous.

BUT we must challenge the current ways of working because they are patently not delivering at the pace we need change to happen.

STIMULATING FRESH THINKING

It is axiomatic that fresh thinking is essential to secure innovation.

Our competitor set supports and nurtures fresh talent. They break with formulaic approaches and they listen to best practice.

The Minister is encouraged to explore international best practice, to apply case studies of success and to listen to non-traditional solutions.

IMPORTANCE OF THE THIRD SECTOR

The emphasis on the third sector as being an increasingly important is shaping and delivering this ambition is welcomed. Indeed, within the third sector resides some of these new voices, hybrid thinkers and the energy to make things happen./

Maritime Heritage Wales is a case in point. A young organisation that, with Government support, has the vision and capability of delivering many aspects of the Governments ‘coastal communities’ agenda and maritime heritage and interpretation agenda.

At the heart of this rubric is the need for Government agencies to accept and respect the fact that the third sector has this potential. The opportunity for say, Cadw to involve and work with Maritime Heritage Wales would be welcomed by the multi-faced maritime heritage interests.

GIVING THE PAST A FUTURE AND THE FUTURE A PAST

Heritage MUST play a much more fundamentally significant and important role in economic regeneration in Wales.

This suggests that there should be a review of the role, policies, strategies and modus operandii of Cadw and other heritage-related organisations and agencies. International best practice consistently highlights the vibrancy of the heritage sector in creating vibrant places and great destinations: a heritage that allows contemporary influences to shape the visitor experience and give 'the past a future and the future a past'.

We must allow heritage properties to live in and contribute to a modern Wales.

We must encourage and allow new uses for our heritage properties, including those with care of the State and we must be open to new ideas about how these properties are managed⁵.

DESTINATIONS ARE THE FOCUS FOR ECONOMIC GROWTH

The consultation document correctly highlights the importance of loci and the role of destinations and destination management.

The concept of destination management is one that is well developed and understood in most of our competitor countries.

It is a concept acknowledged by international development organisations as a key to growing the tourism and the visitor economies of countries. Destinations are the focal points of tourism and place making policy in, for example, Austria, Switzerland and Croatia.

We do not apply the international model in Wales and, as a result, we are less effective in developing places that people want to visit. This needs to change.

In this context we must positively examine the role of the Welsh language in place differentiation and in contributing to a unique aspect of vibrancy and viability

GREAT DESIGN MAKES INTERESTING PLACES

The importance of good design and architecture is highlighted in the consultation document. It is a key issue and more needs to be done to elevate the aesthetic, especially in the visual aspects of our places in Wales. The role of established (and new) bodies to promote and 'teach' design needs to be enhanced and elevated.

NOTHING TO LOSE!!

The consultation document advocates 'doing things differently'. We have nothing to lose by adopting new ways of working as there have not been enough success stories in the past ten years.

34. Public Health Wales

<p>Vibrant and Viable Places - Regeneration Strategy A response on behalf of Public Health Wales</p>	
<p>Author: Carolyn Lester, Lead for Health Inequalities</p>	
<p>Date: 9th January, 2013</p>	<p>Version: 1</p>
<p>Publication/ Distribution:</p> <ul style="list-style-type: none">• Welsh Government• NHS Wales (Intranet)• Public Health Wales (Intranet)	
<p>Purpose and Summary of Document:</p> <p>This document constitutes a response from a public health perspective to this consultation on a regeneration strategy for Wales</p>	

General Comments

1.1 Public Health Wales supports the overall approach taken in this Strategy, including the emphasis on communities and the themes of health, learning and prosperity. Links to Communities First and other regeneration activity is important, together with the recognition that successful and sustainable regeneration depends on the alignment of mainstream programmes. Although Communities First could be the vehicle for engagement and empowerment, an evidence based approach is needed, which will include targeting those most in need, including vulnerable groups and people with protected characteristics. Ensuring that the workforce has the necessary skills and training will be extremely important in terms of ensuring that developments meet local need.

1.2 The focus of regeneration should be on reducing inequalities. Priority should therefore be given to areas where the underlying health determinants are most unfavourable. These areas are characterised by high unemployment, poor housing, high levels of crime and poor access to services and amenities (including healthy food options, entertainment, exercise facilities and healthcare).

1.3 The document recognises that a partnership approach is needed but perhaps more attention should be given to how the local authority regeneration function connects to local partnership planning. Some central direction on how this should be achieved would be helpful. In relation to collaborative working across public sector organisations, there are major opportunities in relation to procurement which have arguably not been fully explored. Examples exist of procurement initiatives where large NHS organisations have procured food from consortiums of local farms or from local suppliers, reducing costs and 'food miles' and promoting the sustainability of smaller businesses. A similar approach could be taken across the Health Board areas in partnership with local authorities.

2. Comments on specific points in the text

2.1 Page 4, 3.1 states that "...consumer patterns of behaviour are changing permanently towards out-of-town and internet shopping". If the above statement is viewed as irreversible, then it implies acceptance of a retail pattern that further disadvantages those worst off in society, i.e. households without a car and without internet access. In order to improve access to goods and services for all, it is essential that town centre retail activity should be increased.

A Living Streets report highlights that improvements to the walking environment can increase the economic value of, and economic activity within, an area. This can be reflected by the sale price of residential properties and the rental price of retail premises (Sinnott et al. 2011). The report also gives some support to the possibility of reducing shopping associated car journeys, reporting that local retailers overestimated the proportion of shoppers arriving by car (estimated at 41% compared with the actual proportion of 22%, in a Bristol study). Transport for London's 'Town centre study' (Transport for London 2011) found that people who walked to a town centre spent an average of £93 per week there, compared with £56 for car drivers or passengers. Bus users spent £70 per week.

This section ends by stating that regeneration strategies should contribute to tackling “poverty and the issues arising from our current economic climate”. Evidence of the likely detrimental effect of the economic situation on public health is exemplified by a detailed study into grocery-buying habits across the UK (Breadline Britain 2012). It was found that the consumption of fat, sugar and saturates has soared since 2010 and that in the space of two years some 900,000 fewer people are managing their “five-a-day” because of food poverty. This situation is likely to be exacerbated when proposed welfare reforms take effect.

The strategy should work with retailers in regeneration areas to ensure access to affordable and nutritious food for all. This should be linked to provision of affordable public transport, especially in areas of low car ownership.

2.2 The promotion of City Regions (P6, 3.3) could be helpful in reducing health inequalities as it may serve to overcome barriers between deprived post industrial areas and relatively prosperous cities. The adoption of a regional approach should contribute to affordable and reliable public transport systems which would improve access to work for those living in areas of high unemployment. It should also ensure that regeneration strategies take account of the geography of the surrounding area (for instance, connections with neighbouring local authority areas), as well as local factors such as major road and rail routes, rivers and mountains.

This section also mentions European Structural Funds (ESF) and the aim to create more jobs via economic growth. Even when jobs exist, individuals who live in disadvantaged areas face many barriers to employment and will need support to overcome these barriers. These include lack of confidence, transport difficulties such as cost and restricted timetables, and the length of the working day when travel time is added. Many parents also find the cost of childcare prohibitive. It has been suggested that a part of ESF could be used to support services which would help to reduce these barriers.

2.3 Section 4.1 (page 10) brings together the issues of poor health, loss of environmental quality and deprived communities. A recent review completed for Welsh Government on green space and health inequities (Lester 2012) highlighted the importance of good quality green space for recreation. Access to such amenities benefits physical and mental health and increases wellbeing, but deprived areas are inclined to have poorer quality green space than more affluent areas. An effective regeneration strategy will have the opportunity to ensure that all new developments have high quality accessible green space and walkable environments.

The fourth paragraph of this section discusses compensating when “correct operation of markets produces outcomes which do not coincide with governments’ social or environmental objectives”. It could be argued that whether the operation of markets is correct or not is a value judgement and that this word should be removed. Market forces are a value free economic phenomenon which can operate to the benefit or detriment of society.

A report on widening opportunities for people in deprived communities (Joseph Rowntree Foundation and The Northern Way, 2001) concluded that economic growth is necessary but not sufficient. Other factors with

explanatory power for improvement include residential mix and community outlook. To turn around a failing local economy, a neighbourhood's internal and external relationships will need attention. Bonding social capital may already exist but it will be necessary to develop bridging and linking social capital for communities to maximise new economic opportunities.

One of the pitfalls of regeneration is that improvements in housing and economic opportunities may attract new people into an area and possibly displace existing residents. This can appear to improve health in a locality when no real improvements have occurred for some original residents, who have moved elsewhere due to increased housing costs.

2.4 Improving education and skills (page 11, 4.3.ii) is an important consideration, as it can contribute to breaking the cycle of generational health inequities. This section could be improved by added detail on environments conducive to health and wellbeing including the provision of good quality housing, reducing pollution, and general improvements to the built environment including refurbishment and green space.

2.5 Changing the determinants of health and seeing this feed through into significant improvements in health and wellbeing can be a long term process and the move towards longer programme cycles is welcomed (P14 5.2iii).

2.6 Regarding planning (page 19, 6.1v), Welsh Government has previously shown flexibility in producing technical advice notes which respond to new evidence, for example, in amending guidance on opencast mining. The planning system should respond to the imperatives for regeneration by encouraging town centre retail and commerce and discouraging out of town developments, which can precipitate urban decline and disadvantage those dependent on public transport. Town centres should provide a focus for community interaction, by prioritising pedestrians and cyclists and providing amenities such as well maintained toilets with baby changing facilities, wheelchair access, signage, bicycle racks, cycle hire and accessible green spaces. Specific consideration should be given to the needs of older people and those with disabilities and/or sensory impairments regarding the design and layout of facilities.

It is recognised that pharmacies, particularly those in rural or more deprived areas, offer opportunities to provide employment and can be open to diversification to remain viable. In addition to their obvious contribution to health care in the dispensing and sale of medicines and provision of pharmaceutical and healthy living advice, they often provide other services vital to small communities. Some include newsagents, post office, photocopying, and ATM services in areas where these services would not otherwise exist. Pharmacies can provide satellite health services: for example, in North Wales some local pharmacies are delivering CBT packages to support patients with depression, providing an alternative to medicines in some cases. Pharmacies provide local collection and delivery of prescriptions and medicines in areas where people may find it difficult to access the shop premises.

2.7 Transport (P19 6.1v) is a basic necessity but Sustrans Cymru (2012) has calculated that more than 30% of people in all parts of Wales experience transport poverty, rising to 60% in the South Wales Valleys. This can limit

access to work, education, health care and social participation. Transport policy has tended to focus on car use but a Regeneration Strategy provides the opportunity to give greater consideration to public transport and active travel which can contribute to health improvement and reduction of the carbon footprint. Encouraging and enabling people to walk or cycle involves action by a number of sectors (NICE 41, 2012), addressing issues which are environmental, social, financial and personal. Real and perceived risks should be reduced and road space should be reallocated to create a more supportive environment. The need for cycle parking and both commercial and residential storage should be addressed, together with infrastructure issues that may discourage people from walking, such as lack of convenient road crossings and poorly maintained footways. Walking routes should be integrated with public transport links to support longer journeys. Encouraging walking can be important in tackling inequities in health and facilities such as dropped kerbs and tactile pavement markings can help to make walking routes accessible to people with disabilities and impairments. There may be further opportunities to link regeneration initiatives with the Rural Development Plan through investment in facilities such as cycle ways and walking routes.

2.8 Where health (page 21) is mentioned, the strategy tends to focus on the NHS role in treatment, and fails to acknowledge the important role of preventing poor health. A good description of the wider determinants model of poor health would be helpful in making clear that poverty, lack of skills, and poor education lead to a cycle of poor health exacerbated by health choices, which are themselves limited by personal circumstances. It is necessary to recognise that it is not only the NHS that is able to protect and improve health and that other organizations have a role by addressing the wider determinants of health. This applies to both Local Authority and third sector partners.

Our responses to previous sections all relate to the impact of regeneration policies and strategies on health and wellbeing and those working to improve public health are very conscious that most policy has an impact on health and wellbeing. Public Health Wales has close links with the Welsh Health Impact Assessment Support Unit and would support the increased use of health impact assessment (HIA) in regeneration activities. Assessment of likely health impacts within Environmental Impact Assessment is very often inadequate and it would be helpful if HIA could be made mandatory for regeneration projects in Wales.

2.9 Regarding evidence based activity (page 27), clearly stating the outcomes expected and how they will be evaluated is an important commitment and this should include impact on health improvement and reduction in health inequities. This links in to section 6.6.1 on Results Based Accountability and Evaluation.

2.10 Whilst the emphasis on the role of sport in promoting fitness (page 28 6.3ii), social bonding and transferable skills is welcome, a wider view which includes other forms of physical activity would be useful. Non-competitive activities such as walking groups, dance and exercise classes can confer similar benefits which can also enhance employability. This type of activity is inclusive and accessible to both sexes, all ages and to previously sedentary individuals, with proven success in engaging socially isolated people and those with mental health problems. An over emphasis on sporting

achievement can result in people opting out and becoming non-active spectators when they fail to reach or retain the standards to which they aspire.

35. Capitol Regional Tourism

Capital Region Tourism
Uwch Ranbarth Twristiaeth

Welsh Government Consultation: Vibrant and Viable Places

Purpose of Report

This report outlines Capital Region Tourism's response to the consultation on Welsh Government's new framework for Regeneration, Vibrant and Viable Places as agreed by CRT's Management Group on 10th December 2012

Background

Welsh Government defines regeneration as:

'An integrated set of activities that seek to reverse economic, social and physical decline to achieve lasting improvement, in areas where market forces will not do this alone without some support from government'.

Latterly, WG's approach to regeneration has been largely based on spatial targeting. In our region this has been delivered through defined Regeneration Areas for Heads of the Valleys, Western Valleys and Barry and the regeneration company Newport Unlimited. It is instructive to note that in each case Tourism was quickly identified as a key contributor to the area regeneration plans, and WG's regeneration resources alongside European and Local Authority investment have been vital to bring forward significant tourism related investment in, for example, the Valleys Regional Park project or the Cognition Mountain Bike initiative (both quoted as good practice examples and both where CRT is a strategic partner with WG in delivery).

Draft Framework

The vision in the framework is that:

'Everybody in Wales should live in vibrant, viable and sustainable communities with a strong local economy'

3 national outcomes are sought:

- Prosperous Communities
- Learning Communities
- Healthier Communities

Operating principles are: Partnership, Strategy and Sustainability

While the framework identifies the need to work collaboratively across government policies and departments (including with tourism), within WG ministerial and departmental responsibility for Regeneration currently sits alongside Housing and Heritage so the draft framework inevitably highlights where these 3 functions can most productively interact. This may explain the stated intention of concentrating on town centres and seaside resorts in terms of future interventions.

In terms of governance the framework identifies the need to ensure that all Wales is explicitly covered (rather than the current Regeneration Area

approach) and organise delivery nationally, locally and regionally. The report identifies the Cardiff City Region (South East Wales) and North Wales as 2 regions but west and mid-Wales forming a single third one, each overseen by regeneration boards, as perhaps further evidence of the 'return' of spatial planning. It suggests that future spatial local or sub-regional interventions will not be pre-determined but subject to assessment against criteria. The framework seeks to influence current funding within and outside WG not least with the next tranche of EU programme funds nominally only a year away. The document however is rather coy about overall levels of funding to support the framework.

Comments

CRT would wish to comment as follows:

- Wales is a small country so it must be clear to all stakeholders what value is being added by each 'layer' of the proposed arrangements in future.
- We believe the governance arrangements for regeneration in the proposed South East Region should take account of those proposed for the Cardiff City Region to optimise resources and avoid duplication
- We welcome the recognition of the regenerative potential of current tourism projects such as VRP and Cognation but would point out that these are working across regional boundaries in both the current and proposed configurations so it will be important that the new arrangements allow for similar inter-regional activities in the future where the community and investor (in our case visitor and tourism community) interests so dictate.
- We have piloted 'bottom-up' community tourism initiatives including the training of ambassadors which good practice could be transferred to other regeneration projects across Wales in terms of community pride and confidence, volunteering and employability opportunities, social enterprise potential and enhanced visitor experience.
- We commend the application of Destination Management principles which are being rolled out across Wales currently. The process would help towns and resorts to identify their distinctive characteristics as well as improving the visitor experience. It is our view that a good place to visit is also a great place to live, work and invest – if we get it right for visitors then the life of our own citizens is also significantly improved.
- Research makes it clear that access to green space and the environment makes a fundamental difference to community health and well-being outcomes and we are concerned that the concentration on the urban could result in diminishing the link between communities and their surrounding 'green and blue' infrastructure.
- Previous initiatives by WG (eg Networked Environment Region) have also stressed the enormous potential, environmentally, socially, economically and culturally of Wales' natural as well as built heritage. This needs to be fully exploited if we are going to optimise our regeneration opportunities. We are aware that other competitor regions (such as Manchester City Region) are taking this approach
- We would like to see more robust and explicit support for tourism through the document bearing in mind it can (and does) benefit all parts

of Wales, builds on Wales' heritage, culture, environment and communities, can act as a catalyst for confidence and pride and provides a range of employment and volunteering opportunities. The current value of the overall visitor economy in the proposed South East Regeneration Board Region is currently calculated at £2bn

- Our involvement with regeneration based projects to date should indicate our clear belief that tourism can continue to act as an engine for community development and we look forward to the tourism sector playing its part in these new arrangements. It should be noted that the new national tourism strategy is currently under development and it is clearly important that this reflects shared goals and can contribute to the success of the regeneration framework
- As a strategic body working across the South East Wales City Region footprint for over a decade we can demonstrate the value of cross border working where partnership comes as 'standard'. The strategy notes RDPs as an important mechanism for the delivery of regeneration through environmental improvements. RDPs across the region have been successful at a local level however there will need to be consideration of the regional coordination of such projects to ensure lessons are shared and duplication and excessive competition avoided. VRP has been particularly useful in that coordination role and greater use of such existing structures would be beneficial.
- It will be important to identify what resources are currently available or anticipated to support the framework as well as optimising additional funding streams such as RDP.

Capital Region Tourism
10th January 2013

36. City and Council of Swansea

CITY AND COUNTY OF SWANSEA

Response to the Welsh Government Consultation Document "Vibrant and Viable Places – New Regeneration Framework"
January 2013

Key Messages

In summary, the key messages from the City and County of Swansea in response to the consultation are as follows –

- a) Greater flexibility is required in the use of resources, albeit within an agreed long term vision and plan, which relates to an ongoing process of regeneration. In Swansea, a great deal has been achieved, but there is much more to be done.

- b) A greater coherence of working between Welsh Government departments and a more inclusive partnership with local authorities are required.
- c) The Framework needs to maintain its focus on poverty and worklessness, and to recognise the developing innovations of local authorities, particularly Target Areas in Swansea.
- d) Welsh Government needs to ensure that the regional footprint for Regeneration is consistent and coherent with other collaborations, particularly City Regions.
- e) Future governance arrangements must be accountable, simple, transparent, consistent and inclusive.

1.0 Introduction

- 1.1 The City and County of Swansea (CCS) is pleased to be able to offer comments on the Consultation Document. The Council has a very close working relationship with Welsh Government (WG) and significant progress has been achieved on a wide range of collaborative projects using a variety of mechanisms. It is considered, therefore, that there is an informed body of expertise and experience in place to facilitate this response.
- 1.2 Following some opening remarks, the response has been structured to respond specifically to each of the questions posed in the Consultation Document. The response will conclude with a brief summary of the approach to regeneration that CCS would wish to pursue, and an indication of some key characteristics that CCS believes important and in place, in order to continue with the collaborative process of regeneration in Swansea in the future.

2.0 Opening Remarks

- 2.1 CCS fully recognises the challenges which have given rise to this review of regeneration. Many of the instigating issues are being experienced at first hand in Swansea, and being addressed through joint working with partners and a continuous assessment of potential solutions and the manner in which these are delivered.
- 2.2 The potential for better outcomes through joined-up working has been reinforced by the new administration since May 2012 – this resulted in several Cabinet Members being appointed to cross cutting portfolios relating to Regeneration, Place, Target Areas and Sustainability. This places a significant responsibility on Cabinet Members to recognise the requirement to be holistic, and consider the impact of their respective portfolios on all aspects of the Council's work.
- 2.3 The economic climate has created significant challenges, resulting in a stalling of the spatial regeneration agenda, impacting upon efforts to address poverty and inequality. The administration's policy commitments are designed to address these specifically, building on the agenda set by Swansea 2020 – Swansea's Economic Regeneration Strategy. This is clearly founded on a collaborative and holistic approach to regeneration, and a series of initiatives that "bridge the divide"

between physical, economic and community aspirations have already emerged.

2.4 CCS has been fortunate to work in two designated Regeneration Areas – Swansea and Western Valleys. This first hand experience of targeted investment has clearly allowed the Council and its partners to begin the process of regeneration. There remains a significant momentum to continue making progress, reflecting national, regional and local aspirations, with a focus on the City Centre, accepting the challenge of the Communities First Programme, a revitalised regional economic and learning agenda, the City’s commitment to the Healthy Cities Programme, and balanced economic regeneration of the rural hinterland of the County.

2.5 On the basis of experience and aspiration, the key issues to address appear to be connected with -

- Economic drivers - which include the changing roles of Town Centres; changing economic circumstances and opportunities (sites and premises, skills, finance); and harnessing the potential of academia
- Use of funding to balance need and opportunity – the potential to maximise the impact of regeneration funding by targeting winners; considering high impact jobs growth and/or investment in the most deprived areas where poverty and inactivity prevail; and managing financial constraints on the public sector.
- Ensuring that political and governance arrangements are rational and supportive – dealing with the uncertainty over City Regions; understanding the potential of regional working and its effect on Local Government; addressing the instability in WG departmental structures, changing funding initiatives and priorities; preventing over regulation and bureaucracy; and being responsive to locally changing political priorities within, for example, local authorities.

3.0 Lessons Learned from Delivery to Date

3.1 The range of regeneration initiatives and programmes that have been in place over recent years have provided opportunity, without taking full advantage of the potential to maximise the benefits of joint working and coordination. At the local and regional level, the evidence of effective partnership working has been in place for many years. Joint Ventures between WG and CCS have enabled progress at Swansea Vale, Felindre and in the City Centre. Effective programmes have resulted from local authority collaboration through the Swansea Bay Partnership, and through the European-funded Programmes through Convergence and Rural Development Plan. Partners in the education, health, voluntary and business sectors have collaborated through the Local Service Board and the Swansea Economic Regeneration Partnership and other similar mechanisms. The degree of WG involvement over the years has been mixed, and has deteriorated in recent years, when it really should have been a main driver. With the advent of Regeneration Areas, this offered an opportunity to adopt a new model that was more effective. It provided more effective engagement with some colleagues in WG, but the process suffered from a requirement to be expedient

before proper consideration of needs and processes, output driven with a focus on short term as opposed to long term aspirations, and demonstrating less integration of government departments than was originally sought. Governance arrangements have been lacking and needed better definition so that partners could see that they were truly party to the decision making process, and the responses to the processes were procedurally sound. There has been a lack of transparency in the application process and selection criteria for funded projects in the current programme that needs to be addressed.

- 3.2 The process of designation needed greater transparency in objective terms, and needed to be a collaborative task instead of being determined at WG level. Strategic linkages to work being undertaken elsewhere is critical in future. WG commitment to the emerging Regional Economic Regeneration Strategy in South West Wales needs to be better than that which occurred with the Swansea Economic Regeneration Strategy (Swansea 2020). Budgets need to be flexible and reflect longer term aspirations. The WG commitment to the Waterfront City Convergence ERDF Programme is a good example -
- Driven by a jointly commissioned and funded policy context – the City Centre Strategic Framework
 - Providing WG funding over 6 years to match Convergence funding which is delivering a focussed programme of work
 - Delivered locally with a local government lead, to meet the holistic aspirations of Swansea 2020, through programmes such as, for example, “Beyond Bricks and Mortar” and South West Workways (Convergence ESF)
 - Involving public, private and third sectors in delivery.
- 3.3 The potential to integrate with community regeneration has not been fully realised, however, and in future, needs to build on the WG’s Communities First Cluster approach, and the Council’s own commitment to Target Areas. A shortcoming of the previous arrangement was a difficulty in focussing on economic outcomes, converting capacity building into skills and jobs, and the more recent inability to continue with revenue funding. A more flexible mix of capital and revenue funding would be welcomed as the lack of revenue funding hampers the ability to address the skills/ people element.
- 3.4 Other work has generated significant benefits and positive outcomes in relation to wider policy objectives such as health or employment. This has been demonstrated in the Hafod Renewal Area, where housing led renewal has resulted in more meaningful and productive engagement with citizens. The neighbourhood renewal exercise (a key part of declaring a renewal area) is a very effective tool for understanding local needs and aspirations and can empower local people to make wider decisions in relation to major regeneration projects. This work emanates from strategic assessments for the allocation of Social Housing Grant, allowing schemes which fit into wider objectives to be prioritised.
- 3.5 Many schemes require a more long term strategic vision which maximises ongoing partnership outcomes and benefits from a longer term financial commitment. These include mixed use development

projects such as the Urban Village in Swansea and the other projects which are currently at scoping or design stage, particularly the mixed use retail-led scheme which is being promoted in partnership with Hammerson. Such developments provide more than the physical improvements and socio-economic benefits attributable to the capital. They secure additional investment and outcomes in terms of skills and training, and also, as for example in the Urban Village, by allocating completed residential units under a City Centre Living scheme which targets people working or seeking work in the City Centre.

3.6 Rural classification of large parts of the North and West of the County has provided the opportunity to contribute to the economic regeneration potential of the more rural parts of Swansea through the Western Valleys RA and Rural Development Plan. Working closely with local and community organisations, public and private sector partners, it helped achieve £5m of investment into encouraging tourism potential, improving provision of basic services, village renewal, conservation and pre-supply chain capacity building work to encourage local producers to tap into local and regional markets more effectively. This investment has helped achieve a strategic focus for project development, particularly targeting areas in greater need of support such as Mawr and Pontarddulais.

3.7 An original founding principle of the former “Strategic Regeneration Areas” was that the potential to draw mainstream programmes in for the benefit of regeneration areas was part of the overall package. The extent to which this happened in practice is mixed, although there are some good examples, which include BETS support in Swansea City Centre, and the use of Regional Transport Plan funding. This principle needs to be reinforced in terms of both agenda and action, and the new Regeneration Framework needs to strengthen its commitment to the Economic Renewal agenda in particular if benefits are to follow. By learning this lesson and prompting coordinated action from mainstream budgets held elsewhere, both need and opportunity can be addressed in regeneration areas.

4.0 National Outcomes and Principles for Regeneration

4.1 CCS is entirely comfortable with the concept of holistic regeneration and its policy commitments as a Council fully reflect the need to deliver prosperous, learning and healthier communities.

4.2 There is complete synergy between Swansea 2020 and the aspirations to deliver prosperous and learning communities, with a range of initiatives contributing to these outcomes, including Waterfront City Programme, Beyond Bricks & Mortar, South West Workways project and Inform Swansea e-portal. Swansea was designated a WHO Healthy City in 2010, under an international programme fully embraced locally by CCS in partnership with Abertawe Bro Morgannwg University Health Board and others. Some of the key strands of this work, that will impact directly on health inequality and benefit communities across Swansea, include promoting health and health equity in all policies; tackling substance misuse through a neighbourhood partnership approach; joining physical activity and nutrition under a single strategic

forum to maximise efforts and resources to tackle inactivity and obesity levels; and prioritising healthy urban environment and design to promote the benefits of healthy urban planning and agree priority areas for improvement in Swansea.

- 4.3 CCS also considers poverty, connectivity and sustainability to be critical underpinning themes which regeneration should seek to address, and quite properly, national outcomes and principles should reflect these. It is considered that all three outcomes should have a positive impact on poverty, and noted that there is already a reference to well-connected communities (transport and broadband) in the prosperity outcome.
- 4.4 Tackling Poverty is at the heart of the Council's approach to its services through the child poverty strategy, and identified as a top priority, particularly in view of the forthcoming changes to welfare. A commitment to improve investment in anti-poverty measures is being sought, and creating jobs and wealth is central to all collaborative work with the Council's partners. To this end, internal arrangements are now in place, led by the Cabinet Member for Target Areas and the Chief Executive, to move the agenda forward with partners, by pooling resources and finance, working together across boundaries, to tackle the trans-generational causes of poverty and deprivation. Initial progress is being achieved with Swansea's Credit Union and various development trusts, and a lead is being given through consideration of the "Living Wage". Housing led regeneration is also playing its part, ensuring that fuel poverty is tackled through the energy efficiency agenda, delivering affordable housing, and contributing to the measures tackling health inequality.
- 4.5 Connectivity is crucial to this aspiration, and whilst Swansea has benefited from significant investment in public transport to allow people to access employment and training opportunities, there is more to be done. As a result, there is a continuing impetus to promote sustainable transport whilst recognizing the needs of the car user, and CCS is committed to working with regional partners, public transport providers and businesses to deliver improved connectivity.
- 4.6 There does not appear to be enough reference under the prosperous communities outcome to activities to tackle worklessness, and it is assumed that references to improving economic activity refer to GVA. Given the negative impact this has on communities in Swansea (and across Wales) it should be included under this outcome. Similarly, there is a need to address the potential of enterprise, particularly in the young, and suitable reference under prosperous communities would be beneficial. Delivering an economic agenda within communities, consistent with the Economic Renewal aspirations, is critical to their prosperity, and it should be acknowledged that targeting successful economic areas, possibly outside but near those communities, may create more and better quality jobs which can be accessed by people from deprived areas.
- 4.7 The significance of sustainability has been recognized by Welsh Government and by CCS as a vital cross cutting theme and this is now embedded in all of the services and projects which are delivered by

CCS. Working with the Welsh Local Government Association, CCS officers and members are informing the agenda that WG intends to progress through the Sustainable Development Bill, developing key work strands relating to Foresighting and Future Trends, Sustainability Report, Climate Change Adaptation and the leadership role required by local authorities to promote sustainable development. There are also numerous examples of CCS demonstrating its commitment to sustainability, such as for example, through the development of a range of impact assessments to assess the sustainability of programmes and projects, to ensure full integration of sustainability principles into the Council's Regeneration Programme. This commitment is underlined by the appointment of a Cabinet Member to champion sustainability, and a number of exciting initiatives are emerging as a result.

- 4.8 Accordingly, CCS welcomes the principles of Partnership, Strategy and Sustainability outlined in the consultation document. Partnership working has been demonstrated effectively in the past and there is a commitment to work innovatively in the provision of space that can accommodate mixed uses and employment opportunities in all schemes, and include the provisions of Beyond Bricks and Mortar. The Council's submission for Enterprise Zone designation is a case in point, where the link between property development and occupation by a variety of uses, including innovative knowledge economy activities, required a partnership between CCS, WG, the private sector and higher education. These are increasingly being pursued with a protocol being drawn up between the Council and higher education to deliver jointly agreed priorities.
- 4.9 A further example arises from work on the ageing population, an issue which is increasingly important but which needs more profile, reflecting some good partnership work with the Abertawe Bro Morgannwg University Health Board (ABMU LHB) and others. The Commissioning Framework and plans for Adult Services, which were developed in consultation with people who use social care services, their carers, and partner organisations, set out areas that service users identified as key to remaining independent, living in their own homes in the community. Among these were safe neighbourhoods, transport and mobility, good quality housing, and social interaction. Five posts of community connectors are piloting working across the ABMU LHB Swansea health community networks (groups of GP practices). They have a geographical focus, are working with Communities First, health partners and the third sector, and intend to develop stronger links with housing and leisure departments on an operational and strategic basis to strengthen this approach.
- 4.10 The "People and Place" approach is central to the Council's activities, as demonstrated through the Waterfront City Programme, and reinforced by our current relationship with WG. Clear strategic direction and leadership is welcomed, and an evidence base underpinning the Council's strategies is already in place. The opportunities presented in the City Centre and in other spatial areas across the City and County must be embraced, so that the need identified by that evidence is addressed. Clearly, there is a balance

required in investment – maximizing opportunities which in turn can address needs.

5.0 Greater Coherence and Cross Cutting Action

5.1 The aspirations for greater coherence in the work of WG departments is noted and welcomed. Since the reorganisation of departments and the loss/redeployment of key personnel a period of establishment has been noted, and a renewed approach is, therefore, of significant potential benefit. The lead coordination role in Housing Regeneration and Heritage is commended given its wide ranging remit, but there are concerns about engagement by other WG departments and the move towards agendas which are properly aligned for greater effectiveness. This must become a primary objective within government at a time of diminishing resources and complex regeneration issues, and perhaps greater clarity on the role of the First Minister's Delivery Unit might assist. The same coherence is advocated in respect of the future consideration of Single Integrated Plans, Local Service Boards, and Local Development Plans, which are not adequately referenced in the Consultation Document.

5.2 CCS welcomes the emphasis on building cross sector links to support regeneration that matches the employment opportunities with the opportunities for skills and training, and with the potential arising from developments and contracts. CCS has been promoting this policy in Swansea for some time, and notes the commitments made from WG. Engagement with the private sector has been largely positive, and in a period of economic austerity this is encouraging. Public sector support and strategic intervention will be critical moving forward if the benefits are to be realised and cross government support is essential to this end. There will be an ongoing requirement to understand the circumstances of the private sector and to manage expectations from business representatives.

5.3 Third sector inputs to regeneration are rightly commended and expected to expand. CCS also welcomes this approach and will develop its networks to facilitate this trend further with business and community organisations.

5.4 There is welcome recognition for the role of local authorities in the public sector. Whilst this is evident in terms of local delivery, based on its current experience, CCS would emphasise the potential for local authorities to provide strategic direction. There is already a strategic commitment in South West Wales to regional working on economic regeneration with a regional strategy and action plan in preparation, and whilst this will develop in future, further recognition and collaboration from WG on this initiative would be welcomed at the appropriate time.

5.5 CCS is keen to further develop its focussed approach towards affordable housing, neighbourhood renewal, energy efficiency, tackling worklessness (including targeted recruitment and training), heritage investment and adult services. A wealth of examples is available to

illustrate this approach, and will be developed further in the ongoing regeneration agenda that CCS will be progressing.

- 5.6 Specifically, CCS hopes that WG departments will engage together on an improved basis to support holistic regeneration, and will engage more positively and proactively with its local government partners. This is particularly important on sectors, where there has been limited engagement to date in Swansea. It is also important on Planning, where CCS has itself linked economic regeneration and planning services in a single Division, sitting alongside other “place-shaping” services including Housing and Culture. This encourages greater coherence in progressing the regeneration agenda.
- 5.7 As stated previously, revised governance arrangements through Cabinet Portfolios within the Council will ensure that services are truly cross cutting, and CCS welcomes the renewed commitment to cross-portfolio working within WG. Good strong governance arrangements informed by results based accountability which link into the overarching corporate priorities will achieve the cross cutting actions desired, and mirror emerging arrangements within this Authority.
- 6.0 National, Regional and Local Approach
- 6.1 The need for a clear, transparent delivery structure is emphasised, and this principle needs to be applied at local, regional and national levels, avoiding the “competition culture” that has pervaded in the past. There will need to be clarity on remit and decision making, and effective channels of communication, supported by processes and procedures which are properly thought through before establishment, in order to determine and progress priorities and mechanisms for delivery.
- 6.2 CCS notes and supports the intention to support local delivery, and believes that this will build on the successful partnership working which has emerged in the wider Swansea area over the years. It also endorses a belief that the skills and capabilities are already in place locally, reflecting community based understanding of issues, and an ability to devise and deliver solutions.
- 6.3 The regional approach is already strongly evident in South West Wales, with many regional mechanisms in place, although some are at odds with the footprint of the Regeneration Framework. For example, Social Services and Health are working on the ABMU footprint for regional working, under the Western Bay Partnership Board, and this approach is endorsed in the Social Services and Wellbeing Bill, due next year, and places a wellbeing duty on the LA and partners. This is further endorsed by the Older People’s Strategy, currently out for consultation, with a focus on wellbeing emphasising the deleterious effects of isolation on older people and the importance of reducing this which has been evidenced to reduce demand on health and social care. In relation to Child and Family services, issues of play spaces, places for older children/young adults to congregate, and the significance of environment and neighbourhood on family wellbeing are important, plus transport infrastructure, all in the context of the Places agenda. Current ESF investments, such as the COASTAL (Creating Opportunities and Skills Teams Alliance) project, operating on the

same footprint, are demonstrating the potential for collaborative working across services to improve opportunities for people particularly around skills and employment.

- 6.4 Positively, of particular relevance will be the recent initiative by the four local authorities in South West Wales, the Regional Learning Partnership, Regional Tourism Partnership and South West Wales Economic Forum to commission a Regional Economic Regeneration Strategy for South West Wales. In addition, the Regional Learning Partnership brings together partners from learning and regeneration across South West Wales to work collaboratively, effectively and efficiently to meet the needs of the learners and the regional economy. It is also noted that the region suggested reflects the area of Swansea Bay outlined in the recent Local Housing Market area. Synergy with all of these emerging remits will be crucial if the Regional Regeneration Boards (RRB) are to effectively identify priorities, and avoid the temptation to “provide something for everyone” instead of focusing on the key strategic interventions.
- 6.5 Clarity will be needed in terms of the City Region recently announced by the Minister for Business Enterprise Technology and Science, as this is not significantly dealt with in the Consultation Document. The work of the appointed City Region Task Force in 2013 will undoubtedly seek to understand the RRB approach, and vice versa, and a consistent and consensual position will be necessary in policy and delivery terms.
- 6.6 Furthermore, the consultation document, quite rightly, highlights the need for joined up working between the new Regeneration Framework and the Communities First programme, but there is no information on how the delivery mechanism for the Regeneration Framework will link with the new structures being established to deliver the Communities First programme. It is critical for CCS that its own agreed Target Areas approach is recognised as a fundamental driver for the regeneration of the most deprived areas, not only by the WG Communities First directorate unit, but also by WG Regeneration colleagues.
- 6.7 An outline definition of the RRB area in South West and Mid Wales seems to draw synergy with WG collaborative areas and WLGA regional boards. However, it must be “fit for purpose” and focussed on interventions that will deliver change and investment across the region, and peculiar to the specific circumstances in the respective parts of the region. To this end, a period of reflection on the characteristics of the area involved and the practical application of the different elements of the likely remit will be essential. CCS believes that it would certainly be a missed opportunity if the area of the RRB was identified on the basis of administrative expediency, as may presently be the case. Of particular relevance in this respect are the requirements of the Swansea Bay City Region, which are inherently different, although complementary to the rural hinterland of South West Wales. Acknowledgement of such a sub-regional approach might give rise to reconsideration of the proposals currently made for three Regional Regeneration Boards, on a “fit for purpose” basis.

- 6.8 CCS has also noted the purpose of the Ministerial Advisory Group, and would be keen to know more of its proposed “make-up”. Such a Group will provide valuable context in strategic direction, national priorities and outcomes, but must be truly cross cutting, with all Government Departments committed and involved, thereby addressing one of the issues that could impede effective collaboration and holistic regeneration.
- 7.0 Targeting and Directing WG Funding
- 7.1 The overall approach outlined is a “tried and tested” formula, with a justified and understandable emphasis on “people and places” recognising the interdependency of one with the other. On that basis, CCS is supportive. The emphasis on identifying communities with a strong economy is particularly welcomed, as this will lead to further employment and prosperity for the benefit of all. CCS has no issue with the evidence based business plan approach as this has been adopted in CCS joint working previously and provides a rigorous basis on which to plan future activities. Similarly, results based accountability, monitoring and robust evaluation is of vital importance, and there is already an acknowledgement of its benefits within CCS.
- 7.2 The mapping of existing mainstream interventions to maximise people-based regeneration, as part of the palette of activities and principles outlined, will provide a useful starting position, but it will need to be focussed on potential outcomes. Many of these are consistent with initiatives already promoted in Swansea, or identified as priorities by the present Council, including social networks around sport and culture, promoting activity and healthy living, and targeted recruitment and training.
- 7.3 Retaining a focus on developmental hubs for place-based regeneration will maximise the investment benefits arising from these areas, presenting opportunities for delivering quality places and the added social benefits that arise. Whilst Swansea has a clear focus on its priority locations in this respect – City Centre, Waterfront and Strategic Employment Sites – and would wish to continue with its programme of work at these locations, it is also committed to communities and neighbourhoods where smaller scale development intervention could have an equally transformative effect, and therefore, needs to be a priority. Indeed this dual approach is likely to be reinforced in the New Year, with a new commitment to Communities First clusters and Target Areas. The opportunity to do further rural development work based on momentum developed within current RDP and Western Valleys schemes adds to the investment potential, ensuring balanced territorial development across the City and County.
- 7.4 A helpful example arises from the housing field. The Council is currently in the process of undertaking a neighbourhood renewal assessment with a view to declaring a new renewal area. If a renewal area is declared, this is likely to be on a completely different basis to the traditional renewal model. It is likely that local, regional and national regeneration priorities will come together in one project delivering shared objectives. Housing led renewal in residential areas close to the

City Centre could help generate a shared vision, improve house conditions and engage residents. Environmental improvements could improve physical links between residential areas and the City Centre e.g. cycle walking routes. City Centre regeneration could provide employment and training opportunities for the same residents. This approach will demonstrate an holistic approach affecting both strategic and more localised priority areas.

7.5 More generally, CCS would agree with your interpretation of “persistent deprivation” and would seek to tackle these across the board through holistic regeneration, and by applying a comprehensive combination of proposals that can be measured effectively and adapted to meet changing circumstances.

7.6 These link effectively to the suite of investment streams that are identified in the consultation document, all of which are essential to the attack on deprivation through regeneration. This is, however, limited in terms of funding sources and potential impact, with some elements very focused on smaller scale community activity and revenue led schemes. The cross referencing to mainstream funds - Wales Infrastructure Investment Fund (WIIP), Regional Transport Plan, Housing funds, economic budgets – is superficial and needs to be secured to allow holistic regeneration to proceed successfully. It will be critical to ensure that these other mainstream funds are not dismissed or diluted in pursuit of this cause, and a commitment to “programme bending” or priority allocation by other Ministers would go some way towards meeting this objective. For example, the Wales Infrastructure Investment Fund needs to be aligned with the opportunities offered and play its part, despite being within the control of a different WG department. The investment streams are also consistent with a “theoretical” approach which uses evidence as a base for proposals across the spectrum of need and opportunity, and utilise the range of funding sources that may be available. The rationale based on “incentivising behaviour” and “supporting intervention not covered by other funding streams” should also include the potential to have a catalytic effect, where a significant investment can generate a range of benefits regionally and locally. Within the context identified, there is no information on how Regional Boards will prioritise projects, although statements have been made regarding a need to move away from the current situation of ‘something for everyone’ to targeting resources towards activities that will have the greatest impact.

8.0 Monitoring and Evaluation of Regeneration Activities

8.1 CCS is happy to endorse the First Minister’s statement relating to a focus on outcomes, and to continue participating in the development of a Results Based Accountability approach to evaluation and monitoring. With a clear commitment to Programme and Project Management underlining its approach, and having participated in a number of European Programme evaluation and monitoring exercises, CCS has experience of progressing regeneration on this basis already.

8.2 The opportunity to develop and contribute to best practice in this respect is welcomed. Given the emphasis on People and Places, it will

be important to receive WG clarity on citizen involvement in the process, reflecting on experiences to date. An essential characteristic will be the extent to which evaluation and monitoring recognises the fact that regeneration is a long term process with some long term outcomes. In this respect and whilst maintaining a positive outlook, many development proposals take years to come to fruition, and social change may take a generation before satisfactory outcomes can be demonstrated, but the process of change must be started and pursued with vigour.

9.0 Swansea's Approach to Regeneration

- 9.1 In concluding the response from CCS to the Consultation Document, it is useful to emphasise what is in place following a sustained period of joint working with partners on regeneration initiatives, and to reiterate the intentions for regeneration moving forward. It is important to reinforce the message that regeneration is a long term process, and that the work is not yet done in Swansea. A commitment to continue with various regeneration initiatives in Swansea, in partnership with WG and others would be welcomed. There is a clear objective of addressing deprivation whilst delivering a transformation of places where future sustainable prosperity can benefit Swansea and the wider region in South West Wales. The process of regeneration would be assisted greatly by having clarity in terms of long term strategic direction from WG as a corporate body, along with the alignment of funding streams.
- 9.2 In order to deliver this, there is a strong emphasis on regional and collaborative working, and subject to clarification of the position between Regional Boards and the City Region, the agenda set by Swansea 2020 will be updated through a Regional Economic Regeneration Strategy by the end of March 2013. This process is directly mirrored in other areas of service provision. It should give rise to a rationale, leading to a business case and a definition of priorities that avoids unnecessary competition within regions for limited resources, and allow maximum impact in the right places
- 9.3 CCS is committed to the process of working within a regional framework, and will cooperate with its partners to that end. It has also adopted a series of policy commitments which are directly aligned with the national outcomes and principles for regeneration offered by WG. In particular, its commitment to poverty, Communities First, Target Areas, targeted recruitment and training and sustainability will, crucially, inform its approach.
- 9.4 The process of strategy and action plan led implementation is second nature for both CCS and WG, with current experience in the City Centre demonstrating how this can work effectively, underpinned by efficient programme and project management and an increasingly important resource based accounting methodology. Future work would be more effective if streamlined administration internally and by WG as a key partner and funding body, including that relating to multiple audit processes, can be achieved.

- 9.5 Significant investments have already been delivered in Swansea, and preparatory work has been undertaken to inform future programmes of work that need to be resourced from both private and public sector sources. Whilst this involves a long process of project development, it does lead to better schemes coming forward for funding and implementation. Furthermore, and in all cases, the added benefits that accrue from such investment will ensure that the “people” perspective is wholly integrated with the “places” perspective. This principle and best practice will be inherent in all of the joint regeneration activities undertaken in Swansea, once decisions on the WG Regeneration Framework priorities have been determined.

CITY AND COUNTY OF SWANSEA

Response to the Welsh Government Consultation Document “Vibrant and Viable Places – New Regeneration Framework”

Appendix to Response – Summary of Previous Achievements and Future Aspirations in Swansea

January 2013

ACHIEVEMENTS TO DATE

- 1) A mature strategic context has been put in place – Swansea 2020, City Centre Strategic Framework, spatial strategies for Felindre Swansea Vale, Swansea Bay and Tawe Riverside Corridor.
- 2) The commitment to regional working and collaboration has been reinforced – CCS is leading on the procurement of a Regional Economic Regeneration Strategy for South West Wales, and this will closely guide the approach towards Post 2013 European Funds..
- 3) There has previously been significant progress in securing EU Structural Funds in a number of programmes and projects relevant to Regeneration.
- 4) Specific schemes have been delivered in pursuit of these regeneration and funding strategies, many with WG support through the provision of match funding to maximise leverage. These include the following.

Investment in Swansea City Centre

- Waterfront City Convergence Programme of public realm schemes in the City Centre and through the Boulevard project
- Swansea Castle improvements
- Waterfront City Convergence Programme and Town Improvement Grant support of building enhancement and property development
- Acquisition and demolition to support St David’s Quadrant redevelopment scheme by Hammerson
- Investment in key buildings such as Llys Gwalia, the High Street Urban Village, former Central Library and Glynn Vivian Art Gallery
- Demolition to allow future development of Vetch Field
- Investment in redevelopment or refurbishment of Swansea City Bus Station and High Street Railway Station

Delivery of Joint Venture Aspirations

- Infrastructure investment at Felindre Strategic Business Park

- Flood Risk Management and infrastructure work at Swansea Vale Business Park

Other Regeneration Area Projects

- Watersport Centre of Excellence at Swansea Bay
- Oystermouth Castle improvements
- Hafod Copperworks in the Tawe Riverside Corridor
- Pontarddulais Town Centre Enhancements
- SA1 Swansea Waterfront Property, Infrastructure and Public Art Investments
- Investment in leisure, play and tourist facilities in various wards
- Energy efficiency schemes in Hafod, Pontarddulais and Clydach
- Support for Rural Development Plan projects throughout Gower, Pontarddulais and Mawr.
- Support for community regeneration projects throughout deprived wards' and Communities First Areas

FUTURE ASPIRATIONS

1. The Regional Economic Regeneration Strategy will provide a basis for holistic regeneration across Swansea and beyond, and provide a framework for future investment in skills, training and investment in competitive places.
2. Within Swansea there is a renewed commitment to supporting Target Areas and addressing poverty, and programmes such as Beyond Bricks and Mortar will continue to support people in an integral manner, where investment in places is taking place.
3. Consistent with the Communities First Clusters, the Target Area approach will be focussed on Swansea's most deprived wards – Townhill, Castle, Penderry, Landore, Bonymanes, Llansamlet, St Thomas, Morriston, Mynyddbach and Clydach – representing around 25% of the City and County's population
4. Target Areas will benefit from investment in, for example, the housing stock, the environment, health, early years development, family support and measures to tackle poverty
5. The role of Competitive Places will be reinforced and investment will continue to be sought to create job and training opportunities in accessible, well connected locations. This will particularly be focussed on the City Centre, SA1, Tawe Riverside and strategic business parks.
6. Partnership working at a strategic level will be enhanced, as for example with the HE sector on Innovation Zone proposals that will populate the Competitive Places providing a range of employment opportunities.
7. Specific priorities will develop many work strands already in hand, and will include the following.

Investment in Swansea City Centre

- Progressing the development of the St David's Quadrant redevelopment scheme with our partners, Hammerson.
- Seeking to deliver high profile employers like Admiral, and supporting their property requirements

- Continuing a programme of public realm schemes in the City Centre including the provision of public art
- Delivering the next phase of Swansea Castle improvements
- Support the development of key buildings and the activities which they will house, such as Llys Gwalia, the High Street Urban Village, former Central Library and Glynn Vivian Art Gallery, and exploring the possibility to progress them further
- Support redevelopment of Vetch Field, Castle Lane, Mariner Street and other key sites

Delivery of Joint Venture Aspirations

- Undertake marketing at the Felindre Strategic Business Park, and agree the basis for future development
- Pursue development opportunities at the Swansea Vale Business Park

Other Regeneration Area Projects

- Support the development of the Second Campus of Swansea University, and other operational improvements and developments elsewhere in the City
- Deliver the next phases of the joint proposals with Swansea University to develop Hafod Copperworks in the Tawe Riverside Corridor
- Deliver the Morfa Distributor Road and other investments in the Tawe Riverside Corridor
- Progress the SA1 Swansea Waterfront programme with Property, Infrastructure and Public Art Investments
- Pursue further energy efficiency schemes in key areas, and promote a District Heating Scheme around Swansea Bay
- Deliver broadband services throughout the City in collaboration with partners according to a programme of work which is already in hand and links to public buildings, schools and libraries
- Support for Rural Development Plan projects throughout Gower, Pontarddulais and Mawr.
- Continue to support community regeneration projects throughout deprived wards' and Communities First Areas, and progress the Target Areas approach as outlined above.

CONCLUSION

1. CCS is already working effectively with its partners, but recognises that new arrangements may be necessary to reflect enhanced regional working, the City Region concept, and the need to apply for Post 2013 European Funds.
2. Mechanisms for effective local joint working have been in place with WG for some years, but this must be revisited in view of the new approach to regeneration that WG is to agree. This will also provide an opportunity to refine arrangements for partnership working with the business and third sectors in support of the wider agenda.

3. CCS has an effective programme and project management methodology that will continue to deliver and monitor progress on all of its schemes.
4. CCS looks forward to working through these issues with WG. Its aspiration is to jointly progress the ongoing regeneration agenda in Swansea, as identified above, for the benefit of the people of Swansea and the wider City Region.

37. North Wales Economic Ambition Board

VIBRANT & VIABLE PLACES: NEW REGENERATION FRAMEWORK

Thank you for the opportunity to comment on the consultation document issued on 22nd October 2012 entitled "Vibrant & Viable Places: New Regeneration Framework".

I am writing on behalf of the six unitary authorities in North Wales which make up the membership of the North Wales Economic Ambition Board of which I am the Chair. The Board was formally established in 2012 with a vision,

- to establish North Wales as a confident and outward looking region with a diverse and high value economy, providing a range of quality, sustainable employment opportunities for its people, and
- for the six local authorities in North Wales to collaborate and work collectively to increase economic productivity, competitiveness and growth.

The aims and objectives of the Board are,

- to identify areas where there is added value from joint working and enhances collaboration,
- to maximise the impact of available resources in economic development by working collectively at a strategic level,
- to maximise the impact of available resources in economic development by working collectively at a strategic level,
- to promote a change in culture and attitude with a greater emphasis on shared values and mutual trust in relation to collaborative Economic Development, and
- to work collectively as six unitary authorities to provide North Wales with a strong and influential voice in terms of economic development.

I understand that the individual authorities will be writing to you directly with their own responses to the consultation in the context of their own areas but the following views are shared across the region. It is the view of the Board that the consultation document has many good features including most importantly, a recognition that vibrant, viable and sustainable communities must be based upon a strong local economy. There is however an opportunity to improve the delivery and governance arrangements proposed in order to achieve the strategic outcomes outlined and this will be the key to transferring the vision into reality.

1. What is your feedback on lessons learnt from delivery to date?
Granting Regeneration Area status has certainly levered additional value to the regeneration activity and interventions in the areas which have received this designation. However, the short timeframe for the

implementation of the current Regeneration Area programmes, the allocation of funding before strategic planning has been completed and the use of annualised funding targets are not conducive to the development of quality projects which will achieve the best outcomes and lasting improvements desired for the areas concerned. The proposal to develop projects taking greater account of the Treasury Green Book approach is particularly welcome and will hopefully also be accompanied by greater adherence to the principles of the Office of Government Commerce approach to programme and project management which has been noticeably absent to date, particularly in view of the large amounts of public funding involved.

The lack of revenue funding in the Regeneration Areas programme has constrained the type of activity which has been supported and this has not been conducive to the structured development of quality projects which the Office of Government Commerce approaches advocate.

The rigid boundaries of the current Regeneration Areas and the lack of transparency concerning their original selection has meant that funding available has not necessarily been used to achieve the greatest benefit for the areas of greatest need. This is because it has not been possible to allocate regeneration funding to investments located outside the existing Regeneration Areas but which can nevertheless offer significant opportunities for the benefit of the wider region with Enterprise Zones and World Heritage Sites being examples of these locations.

2. Should other national outcomes or principles be considered?

The focus should be on achieving higher level outcomes which should be "SMART" and there needs to be a recognition that achieving the lasting improvements desired could be a lengthy process.

It is disappointing that none of the outcomes specifically address the needs of people with disabilities, rural communities and communities which are peripheral to the main conurbations. Nor do they make any reference to culture or the Welsh language.

3. What more can be done to achieve greater coherence and cross cutting action across departments?

There certainly needs to be much greater coherence across Government departments and programmes and this will underpin the future success of the new Framework. The Welsh Government's Regeneration Area teams have a key role to play in achieving this coherence and there needs to be greater clarity around their responsibilities in this regard.

The acknowledgement of the key role of housing policy in regeneration is welcome and this is also true in relation to heritage. Yet, as an example, the Deputy Minister's oral statement in July appeared to preclude the use of the future EU structural fund programmes to support access to heritage and the natural environment. In fact, apart from a passing reference to the Rural Development for Wales in relation to the environment, consideration of how the potential benefits which can be accrued by directing the future EU structural funds programmes to deliver the proposed outcomes for the framework is noticeably absent not only from the framework itself but also

from the early discussions relating to the future structural funds programmes.

The North Wales region is unique in Wales in that its three eastern unitary authority areas form part of a cross border economic area that exhibits the traits of a city region. This has recently been the subject of a substantial piece of work by a Ministerial task and finish group and the potential opportunities for areas of need which can be derived from this unique opportunity should not be overlooked in this framework.

4. Do you agree with the national, regional and local approach set out? The North Wales authorities strongly support the introduction of a regional approach but would advocate the use of existing structures such as the North Wales Economic Ambition Board to avoid a proliferation of new boards, unnecessary duplication of activity and the inefficiency in delivery which would result from this.

By establishing the North Wales Economic Ambition Board, the six unitary authorities have introduced a very capable regional leadership to economic development and regeneration which has led to the unanimous agreement of a clear strategic vision for the region which transcends any parochial considerations.

Different ministers have proposed the establishment of a number of different regional boards and this review should provide an opportunity to explore an integrated regional structure which would address wider issues around the regeneration of communities rather than focussing upon the allocation of regeneration funding.

In determining the membership of a regional board, the value which candidate organisations can potentially add to progressing its work needs to be assessed to ensure that it retains a clear focus.

5. Do you have any comments on our proposals for how we will target and direct our funding?

Further details of the amount of funding available and the formula to be used for its allocation would be needed to provide a comprehensive response to this question.

The concentration of regeneration resources to address the needs of the areas experiencing the greatest deprivation clearly makes sense from an economic and strategic perspective. However, the mechanism for directing investment to market towns or rural areas which, without some form of intervention, would also be at risk of economic stagnation albeit on a scale which is smaller than in the priority areas, is unclear. The mechanism for directing investment to projects which are located in areas of opportunity but which can bring benefits to areas of need is similarly unclear.

Whilst the current Rural Development Plan for Wales and its successor which will follow from 2014 can support measures to regenerate rural communities, the funds available are limited, heavily prescribed in terms of what they can be used for, and will generally only support small projects. Regeneration projects of any significance in rural communities requiring public funding to kick them off will not be able to access this through the Rural Development Plan alone.

Proximity to Communities First areas is a reasonable evaluation criterion to take into account when targeting funding but this should not be an overriding consideration as this would effectively exclude many rural and peripheral communities from receiving investment through the framework and could also exclude projects which are located in areas of opportunity but which can bring benefits to areas of need.

The nature and scale of the finance which is likely to be available from the future EU structural funds programmes and its spatial distribution should also be taken into account when targeting and directing funding through the framework.

6. We want to ensure effective monitoring and evaluation of regeneration activities. Will the approach set out achieve this?

The greater rigour proposed is welcome but there really needs to be a consistent approach to monitoring and evaluation not only geographically across the principality but also across all programmes of Government including those funded through the European Union.

Yours faithfully,

Councillor Hugh H Evans OBE

Leader, Denbighshire County Council

CHAIR OF THE NORTH WALES ECONOMIC AMBITION BOARD

38. Newport University

Proposal to Establish a High Street Academy in Newport

1. Introduction

This proposal has been developed in response to the crisis that is being faced by town and city centres across South Wales, and because of the irreplaceable role that vibrant town centres play in the life of communities.

The role played by town and city centres is more than a purely functional or economic one. According to the internationally acclaimed expert on the development of cities, Jane Jacobs (1961): "The trust of a city street is formed over time from many, many little public sidewalk contacts.... The sum of such casual, public contact at the local level... is a feeling for the public identity of people, a web of public respect and trust, and a resource in time of personal or neighbourhood need." Mary Portas, in the foreword to her report on the future of high streets (2011), says "High streets are the heart of towns and communities. They have been for centuries".

High street business includes retailing, but it must also be seen as including a whole range of other activities. According to Mary Portas (2011):

The new high streets won't just be about selling goods. The mix will include shops but could also include housing, offices, sport, schools or other social, commercial and cultural enterprises and meeting places. They should become places where we go to engage with other people in our communities, where shopping is just one small part of a rich mix of activities.

That is why the scope of what is proposed here addresses all forms of high street business or social enterprise, and not only retail. This proposal is designed to strengthen the set of skills and breadth of awareness of those people engaged in developing, managing or working in such organisations.

The partners behind the proposal combine the relevant strengths to be able to effectively source the knowledge and skills required, and to organise for these to be shared and developed with the relevant businesses and organisations.

The partners to the proposal are:

- Newport Chamber of Trade
- Kingsway Shopping Centre, Newport
- Newport Unlimited
- Centre for Regeneration Excellence Wales
- Capita Symonds
- Coleg Gwent
- University of Wales, Newport (due to become part of the University of South Wales in 2013).

2. Newport & South Wales

It is proposed here to establish a High Street Academy for South Wales. Newport is seen to be an appropriate place to locate the headquarters of such an Academy, as it is one of Wales' three largest cities, and its town centre is widely seen to be in the throes of a long decline. In recent times, well known high street brands, including Top Shop, Dorothy Perkins, Burtons, Wallis, H&M, Marks & Spencer's and Next have all announced that they are leaving Newport City Centre, creating a sense of crisis of confidence about the city centre's future viability. The region faces an increasingly dysfunctional situation, where a population of over 150,000 people increasingly lacks a communal focal point for sense of community or identity that simply cannot be replaced by shopping centres in Cwmbran or Cardiff. The centre of Newport has a long history, and features some outstanding architectural heritage, both of which are grossly undervalued and inadequately harnessed as a result of the current weakness of its city centre. In response to this challenge, Newport Unlimited, the regeneration company, has negotiated with investors and other partners to put together plans to enhance the town centre through retail and other businesses which are due to result in a net growth of 3,500 jobs by 2020 (Newport Unlimited 2012).

The crisis of viable town centres is not confined to Newport in the South Wales region. Many towns across the Valleys, from Ebbw Vale to Caerphilly are struggling with a similar weakness in their town centres, which compromises all efforts to develop more vibrant and cohesive communities in those towns.

A traditional strength of both Newport and the Valleys towns has been their "alternative" character, providing a place for culture and business activities of a more individual and diverse character. However, one issue that we have identified is that those most likely to lead "alternative" businesses typically lack business skills and contacts, and the Academy proposed here will be designed to address this issue.

An additional potential strength that Newport has is a varied ethnic mix. This is not currently reflected in the city centre although it shows up strongly in the small shopping areas around the city outskirts. There are around 150 independent traders in these various areas. The development of the city centre with a greater variety of shops, catering outlets, leisure and cultural activities will aid in the enhancement of a sense of community.

Therefore we are positioning the proposed High Street Academy as being primarily an initiative aimed at regenerating Newport and other towns across South Wales.

3. Size and Scope of the Challenge

The sectors represented on the high street represent a very large part of the overall economy. For example the Times Higher Education magazine recently reported (December 2012) that Retail and Finance, both sectors largely focused on the high street, are the top two sectors responsible for recruiting graduates in the UK today. Retailing is the largest industry sector outside of Government, and accounts for 139,000 jobs in Wales today (Skill Smart, 2010).

The health of high street business in Wales is weaker than in the rest of the UK. The vacancy rate for high street premises in Wales in 2010 was 18.5%, while the UK average was 14.6% (Local Data Company 2012). At the same time the rate of new business birth in Wales in 2011 was 8.5%, while the UK average was 10.2% (BIS 2012). Therefore, the health of high street businesses in Wales is in urgent need of attention, so improving the quality of skills of both staff and management in these businesses is of clear strategic importance to the functioning of the whole economy.

In addition to the pressures of general recession, high street businesses face serious competitive challenges. On the retail front, the high street share of this business has fallen since the year 2000 from roughly 50% to 40% of the total. The biggest competition so far has come from out of town shopping centres, which have increased their share from just over a quarter to nearly one third of the total. Suburban shopping centres are essentially private spaces, and normally lack the diversity of use and public character necessary to form the focus for a true sense of community or local identity. On the other hand, the fact that they are commercially managed by a single company that organises and markets them has been identified by Mary Portas (2011) as a competitive strength for out of town centres.

In emphasising the community role of high streets, Mary Portas in her report put forward the idea of a "Right to Try", providing opportunities for community-based high street start-up businesses. The role of the third sector on the high street is one that is included within the scope of this proposal, and can help to further differentiate the high street from private shopping centres.

A faster-growing competitor to the high street is the internet. The share accounted for by on-line retail sales is expected to move from 8.2% this year to 25% by 2020 (BCSC 2012). The BCSC report does not conclude however that high street businesses are therefore doomed to decline. It identifies what is called "destination shopping" – i.e. shopping partly as entertainment or

combined with entertainment or cultural experience – as being the most resistant to the on-line threat. It also identifies the use of technology in high street businesses as being key to ensuring that physical space for retail remains relevant. Part of the challenge is for businesses with a high street presence not to see themselves as entirely competing with the internet, but to be able to also harness the internet in support of their businesses.

High street businesses face other challenges also. For example the 2010 revaluation of Business Rates has significantly increased costs for high street business. Accessibility and transport are also a major challenge as is the requirement for a car parking strategy.

There have been examples of some promising initiatives to regenerate town centres. Rotherham Town Centre's Business Vitality Scheme, for example, has attracted new, specialist independent retailers to set up business (Regeneration of Town Centres report to National Assembly of Wales, 2012). In Acton market, new traders are offered free training as part of a regeneration initiative, one of the few cases where the importance of skills development is fully recognised in the development of this sector. Another such case can be found in Monmouth, where there has been training of traders in the use of social media, and the whole town is being developed as a "Wiki-town" through the "Monmouthpedia" website (<http://en.wikipedia.org/wiki/Monmouthpedia>).

4. Importance of Skills

As noted above, skills development has for the most part so far been neglected in strategies of town centre regeneration, with some exceptions. However, the importance of skills is in part implicitly recognised. For example, the Regeneration of Town Centres report to the Welsh National Assembly (2012) states:

We believe that the key to success in town centre regeneration at a local level is strong, effective leadership. We therefore recommend that the Welsh Government should consider how better to support people who have the necessary skills and the respect of the local community to act as champions for bringing together the different aspects and players in town centre regeneration.

The report recommends that "town partnerships ... market their unique selling points such as architectural heritage and environmental quality, local produce and local culture", an exercise requiring more than the traditional skills associated with retailing.

Mary Portas in her report (2012) also touched in a number of places on the importance of nurturing the skills of business leaders, including the recommendation to promote "mentoring relationships between large retailers and their smaller local neighbours". In her advice to shopkeepers, she stresses the importance of three themes: experience, service and specialism. Developing each of these competitively requires appropriate skills.

The partners to this proposal have identified the need for raising skills levels of high street businesses as a critical, and long-neglected, part of the challenge of reviving town and city centres. The experience of the partners in

working with such businesses has identified the following areas of skill as being highly relevant to this sector:

- Customer service (also eg for security, cleaning staff in town centres)
- Entrepreneurship
- Internet awareness and use
- Digital presentation and data capture
- Merchandising
- Design and layout of premises
- Professional buying
- Marketing, including analysis and response
- Finance
- Book-keeping and accountancy
- Town centre management
- Event management (eg festivals)
- Facilities management
- Security
- Awareness and enhancement of heritage
- Sustainability awareness.

Skills and knowledge training can encompass for example language skills and culture training for immigrants who are more than willing to start a business; this will add diversity and added character to town centre offerings, and aid community relations.

A particular strategic challenge would be to help all high street businesses to understand more effectively the role of “blended” retail or service delivery – i.e. how high street and on-line presence can complement each other. Experience of this is already being gained by 3VTV, for example, an on-line community TV station run by Newport University in Blaenau Gwent, where local high street businesses have been using the station to promote their own businesses.

However, no one partner has within its own organisation the capacity to deliver training in all of these areas of skill, which is why a more flexible, network-based form of Academy is proposed here.

The projected growth of an extra 3,500 jobs in high street business arising from developments being sponsored by Newport Unlimited, together with the ongoing annual rate of businesses dying and starting up at close to 10% (Wales Online, December 2012), means that the scale of the skills requirement in Newport alone, let alone the whole of South Wales, is substantial.

5. Current Provision

Some provision exists of training for the retail sector in Wales, mostly in the FE sector. The majority of full-time vocational FE provision has general business & retail skills embedded in it. Some FE curriculum (e.g. Hospitality, Tourism, Hair & Beauty etc) does specifically cover retail and customer care skills. The part-time FE curriculum is more tailored to meet the particular

needs of people working in the sector - for example training of security staff. The great majority of this provision is aimed at school leavers, although some Level 4 provision is provided through the UK Open College. Skillsmart, the Sector Skills Council, no longer operates, and its role has been acquired by People First, which has a focus on general small business.

It is notable also that there are no courses available in town centre management – the Association of town Centre Managers and the Association of Market Towns could also become potential partners in this area.

What is missing from current skills development provision is any organisation focused on higher level skills or business planning for high street businesses, helping to equip the owners of such businesses with a wider understanding of the challenges such businesses face, and the range of possible responses that could be developed to them.

6. Mission and Scope of Proposed Academy

Given the nature of most high street businesses, and their difficulty in committing time to attending courses, the model of engagement and skills development with such businesses needs to be different to the conventional delivery of courses. What is proposed here is a new model for delivery, capable of sourcing the full range of levels and types of skills provision in response to need.

The purpose of a new High Street Academy in Newport would be to:

- strengthen the skills of staff and management in retailing and other businesses based on the high street;
- to broaden the horizons and understanding of the challenges in the environment for high street businesses by learning from best international practice;
- to provide a particular focus on facilitating improvements in the quality and attractiveness of city and town centres in Newport and other urban centres in the South Wales region in need of regeneration;
- encourage a higher rate of successful start up of new high street businesses.

The scope of the target client group can include:

- owners of high street establishments
- staff working in high street businesses
- existing high street businesses
- proposed new high street start-up ventures, including drawing on relevant schemes such as Pop-Up Britain
- organisations and agencies involved in supporting high street businesses, including town centre management.

In addition to organising programmes aimed at raising skills and awareness, largely delivered through on-the-job projects, the Academy would also aim to become a centre of excellence capable of sourcing or providing consultancy where required, as well as organising research into current challenges and best practice in the sector. It would organise activities such as workshops,

conferences, seminars in order to raise awareness of and work out responses to future challenges and skills requirements.

The Academy would also be interested in applying the Sirolli model or something similar, with the aim of promoting in particular businesses led by people from more disadvantaged backgrounds.

The Academy can also provide a independent forum for collective thinking about future direction of specific towns or cities, which would greatly assist local authorities in the development of their plans. The work of the Academy as a centre for knowledge and skills development can complement other initiatives such as the development of Business Improvement Districts. The Centre could also articulate proposals and conclusions to wider stakeholder groups on priorities for bringing life back to high streets.

7. Governance

The proposal is that such an academy be seen as a joint venture undertaken by a consortium of the partner organisations, which between them will be in a position to ensure that the right level of expertise can be deployed through the Academy to deliver its mission effectively.

Participation will also be invited from local authorities and other agencies with responsibility for promoting the health of town centres. This participation may take the form of playing a facilitating role in the network, after appropriate training for such a role, enabling the managers concerned to gain a more acute insight into the issues and opportunities facing high street businesses.

The High Street Academy would be overseen by a steering group on which the consortium of partners would be equally represented. It would most likely be a legal entity jointly owned by the partners, and the steering group would form the Board. A Director for the Academy would be recruited by this Steering Group, and would be answerable to it.

8. Mode of Operation

Because of the critical stage of the future of Newport City Centre, it is proposed to locate the headquarters of the Academy in the City Centre of Newport, possibly in the Royal Chambers section of the Indoor Market.

Acquisition of skills and knowledge through the High Street Academy, it is proposed, would take place principally in the workplace, through development and delivery of projects to be implemented in that context. This can include the introduction of new processes, design or layout of premises, or lines of merchandise in an existing business, or the development of a plan for a new business. Peer mentoring would also provide a major channel for learning, as participants meet in groups on a regular basis, and learn to trust each other and share ideas and experience.

A range of expertise will be made available to the network of participants in the Academy through the organisations forming the consortium. This expertise will address a combination of generic business skills and skills specific to retailing, and often to specific forms of retailing. It is intended that participants

who own or manage high street businesses will develop an understanding of the impact of new technology, including the internet, on their business, and develop a coherent response to this, as well as to other major challenges in the environment.

For participants, the level of skills and knowledge development will vary according to the business need. It is expected that for all the following combination of learning experiences will be made available:

- development and implementation of a project in the workplace
- participation in a facilitated peer network;
- access to expert seminars and talks, addressing mainly subjects that emerge through the discussions in the network, or in response to the issues arising from the work projects.

It can be made an option to have the projects developed assessed by an appropriately qualified panel, which can include a venture capitalist, and which can lead to the award of a qualification by the University or Coleg Gwent. This could include, for more complex and ambitious development plans or projects, the award of a Master's degree.

9. Funding Model

Funding would be required for the Academy both to employ the Director and an assistant, who would oversee the organisation of the peer network, and to organise a programme of expert guest speakers. The Steering Group, or their nominees, would approve the project proposals submitted by participants. Group facilitators, sourced from organisations with the role of promoting and supporting retail operations, including local authorities, banks, business consultancies and others, would play the role of facilitator as a form of career development for themselves.

It is estimated that a quality programme of this type, with participation from up to 100 individuals, would require an annual budget of the order of £3-500,000, depending on the range of activities undertaken. Large retail or high street leisure organisations in particular can be expected to pay the cost of the activities accounted for by their staff. This could include delivering, on a franchise basis, the retailers' own company-specific training, especially where this is needed on foot of new retail developments such as those being pursued by Newport Unlimited.

Funding from the Regeneration budget of the Welsh Government, it is proposed, would be targeted at supporting the development needs of the smaller higher street businesses. Provision of funded support to such businesses can, where appropriate, be made conditional on the development of an appropriate plan for the business.

10. Impact

It is proposed that the impact of the High Street Academy should be measured in the following ways:

Direct

- Numbers of people trained through Academy-organised programmes working in local high street businesses
- Numbers of people trained through Academy-organised programmes employed for the first time by local high street businesses
- Number of new high street business start-ups assisted through involvement with the Academy
- Number of town centre strategies which have been informed or enhanced through engagement with the Academy

Indirect

- Reduction in high street vacancy rate within the catchment area of the Academy
- Increase of footfall in town centres within the catchment area of the Academy.

11. Proposal: Preliminary Market Investigation

Before applying formally for funding to support the full establishment of a High Street Academy, it is proposed as a preliminary step to undertake specific research into the needs of potential clients and stakeholders in South Wales, in order to inform the development of a more detailed business plan for the Academy.

For this purpose, a budget of £20,000 is requested. Such a budget would enable the following exercises to be undertaken:

- Comprehensive review of existing data on town centre developments across South Wales;
- Interviews and focus group discussions with representative samples of high street business owners or managers, local authorities, shopping centre managers in town centres, and other support organisations;
- Development of detailed business plan proposal on foot of the above.

Proposal submitted by:

Alan Edwards, Newport Chamber of Trade

Michael Hine, Manager of Kingsway Shopping Centre, Newport

Paul Tarling, Newport Unlimited

Dave Adamson, Centre for Regeneration Excellence Wales

Jon Fox, Capita Symonds

Guy Lacey, Coleg Gwent

Jonathan Deacon, University of Wales, Newport Business School

Chris O'Malley, University of Wales, Newport

39. Blaenau Gwent

Welsh Government

Consultation Document

Vibrant & Viable Places

New Regeneration Framework

Response from Blaenau Gwent County Borough Council

1. Introduction

On Wednesday 19th December 2012 the Council's Executive Committee received a report on the above consultation document and it was resolved that the following comments should be sent to Welsh Government.

2. General comments

There needs to be a clear Regeneration Framework for Wales and the need for a transparent, open and evidence – based approach to the allocation of funding; for the vital role of local government to be recognised; for a “whole government” approach to regeneration; for a flexible approach to boundaries recognising area of need and opportunities and making links between them; and for coherent spatial plans so that regeneration efforts are complementary across a region and do not result wasteful duplication and competition, are all supported.

In principle the approach set out in the Regeneration Framework is supported; however there are some areas of concern and these are highlighted below:

- a) An area where improvement is required is the attraction of inward investment and the creation of jobs and the links to the work of the BETS Department Strategies. Furthermore, the link between Welsh Government and the Department of Work and Pensions regarding project development and new programmes to deal with skills training and dealing with long term unemployment need substantial improvement. It is suggested that there could be scope to develop a regional programme to tackle unemployment and to take advantage of new European funding to invest in such a programme.
- b) Past approaches to regeneration have tended to be led from the centre, often with a pot of central funding. This approach cannot continue, the development of new approaches is crucial if sustainable regeneration is to be achieved. Tackling disadvantage must be a key priority, but also close collaboration with the private sector will be of utmost importance. Consequently, a key thread is the development of opportunities and innovative approaches to tackle disadvantage. In this context it is considered essential that more emphasis is placed on links with the private sector and “grass roots” community engagement.
- c) There is concern about proposals regarding the 3 Regeneration Boards and their functions. The work that is undertaken in each of the 3 WLGA Regional Partnership Boards had not been recognised each of the Boards has already been developing their plans for regional development over a considerable period and there is a risk of duplication or configuring priorities/strategies emerging. Furthermore, the consultation document is not clear on the relationship with the City Region concept. A more joined up approach from policy making at Welsh Government would address this area.

3. Comments on 6 Questions

Welsh Government Specifically required the Council's view on 6 questions and these are listed below.

1. WHAT IS YOUR FEEDBACK ON LESSONS LEARNT FROM DELIVERY TO DATE?

It is confirmed that the Regeneration Area approach has been beneficial to regeneration investment in Blaenau Gwent as demonstrated by the substantial investment secured for the redevelopment of the former steelworks site at Ebbw Vale, through The Works project. In addition, Blaenau Gwent was a key partner in the Heads of the Valleys Programme, which again was effective in the provision of investment into a range of regeneration projects, for example:- Valleys Regional Park, JobMatch Programme and town centre regeneration.

However, an area where improvement is required is the attraction of inward investment and creation of jobs. Furthermore, the link between Welsh Government and the Department of Work and Pensions regarding project development and new programmes to deal with skills, training and dealing with long term unemployment needs substantial improvement. It is suggested that there could be scope to develop a regional programme to tackle unemployment issues and to take advantage of new European funding to invest in such a programme.

A key lesson learned to date is the importance of strong local delivery within a context of regional planning and strategy development. In addition, experience from delivering The Works has highlighted the need for consideration of local capacity at the project concept phase; in order to ensure that local/Welsh businesses are afforded the opportunity to enter the supply chain for construction projects as all too often local products/services are inadvertently designed/specified out.

2. SHOULD OTHER NATIONAL OUTCOMES OR PRINCIPLES BE CONSIDERED?

Suggest that the main aim should be the creation of jobs and that this needs to be made explicit in the Regeneration Framework – currently this objective is concealed in the outcomes of Prosperous Communities and Learning Communities.

Agree that the PEOPLE AND PLACES approach could be an effective means of developing the new Strategic Framework based on partnership working.

3. WHAT MORE CAN BE DONE TO ACHIEVE GREATER COHERENCE AND CROSS CUTTING ACTION ACROSS DEPARTMENTS?

It is suggested that more coherent and cross cutting action could be achieved if there was more joint working between Welsh Government civil servants, local government (including Members and Officers) together with representatives of the private and voluntary sector. Currently, policy initiatives are directed by Welsh Government whereas a more collaborative approach involving grass roots community representation could be a more effective manner of developing new INNOVATIVE policy frameworks. Indeed, it is considered that the development of new innovative projects should be a key component of the new Regeneration Framework. Being able to attract private investment is a key aspect of successful regeneration. Whether this is encouraging new start ups, the relocation of existing business or gaining the support of financial institutions to fund development, private sector investment and involvement is crucial.

4. DO YOU AGREE WITH THE NATIONAL, REGIONAL AND LOCAL APPROACH SET OUT?

In principle the approach set out in the Regeneration Framework is supported. However, there are some areas of concern – in particular the proposals regarding the 3 Regeneration Boards and their functions. The work that is already underway in each of the 3 WLGA Regional Partnership Boards (RPB's) has not been recognised. Each of the Boards has already been developing their plans for regional development over a considerable period and there is a risk of duplication or conflicting priorities/strategies emerging. Furthermore, there is a need for clarity on how the SEWDERB work and Cardiff City Region concept would be merged with the new Regeneration Framework. In addition, there needs to be clarity on membership of the proposed Ministerial Advisory Group, again there needs to be involvement of the private, local government and voluntary sectors on this Group if there is to be genuine partnership working. The focus appears to be on regional planning and strategy, however, how this translates into local delivery requires further clarity.

5. DO YOU HAVE ANY COMMENTS ON OUR PROPOSALS FOR HOW WE WILL TARGET AND DIRECT OUT FUNDING?

Past approaches have tended to be led from the centre, often with a pot of central funding. This approach cannot continue, the development of new approaches is crucial if sustainable regeneration is to be achieved. Tackling disadvantage must be a key priority, but also close collaboration with the private sector will be of utmost importance. Consequently, a key thread is the development of opportunities and initiatives to tackle disadvantage. In this context it is considered that more emphasis needs to be placed on links with the private sector and “grass roots” community engagement. Successful regeneration activity is a complex process. The need to engage, plan, develop, finance and deliver regeneration projects which are inherently varied according to local circumstances means that a regeneration programme must be locally led.

6. WE WANT TO ENSURE EFFECTIVE MONITORING AND EVALUATION OF REGENERATION ACTIVITIES, WILL THE APPROACH SET OUT ACHIEVE THIS?

Monitoring and evaluation of regeneration programmes is essential in order to identify good practice and to ensure that the desired outcomes are being achieved. However, in order to be effective it is crucial that across Wales and the three regions that there are agreed performance indicators. Currently across Wales there are 22 local authorities each with its own set of indicators regarding regeneration, and each authority is consequently subject to Wales Audit Office challenge over the indicators. Clearly, this is a waste of resources at a time of austerity where simplified models could be more effective.

Should you require further information regarding the comments made in this letter do not hesitate to contact me.

Yours sincerely
Gareth Jones
Chief Regeneration Officer

40. Stephen Walters

To whom it may concern,

Having over the last 50 years been working on and helping to develop Maritime Heritage projects across the UK, I am somewhat surprised not to have seen more than a cursory comment in your consultation paper, "Vibrant and Viable Places", on your Welsh, Coastline and Maritime Heritage. As Tourism is nationally acknowledged to be the third largest income generator in the UK, people do not yet seem to have grasped the cross fertilisation between Tourism, The Sea, The Coastal Communities, Shipping and its various uses for Leisure, Trade and Transport. Tourism income drawn from people from outside the borders of the country being visited is the equivalent to goods and services sold overseas, the much vaunted "Export Trade".

As one of the persons responsible for a major and Internationally unique collection of 300 + historic Man and Wind powered craft branded as World of Boats by its registered Charity operator EISCA Limited, I am currently setting up a "Meanwhile Use" base on the waterside in Cardiff Bay to display just a few of its assets. Thus as a member of the "Third Sector", as referred to in your document, where does Heritage and Maritime Heritage specifically get considered as a contributor to economic development or regeneration in your deliberations?

Too often our Historic Buildings, Houses, Castles, Industrial sites and Countryside are regarded as our Heritage. But Ships, Boats, Planes, Trains, Machinery and the very people from each area are just as important in exemplifying our differences and our unity as interlinked Nation States.

For too long we have looked at economically declining ports, harbours, coves, seaside cities, towns and villages as a quaint nuisance and perhaps to the discerning few a fading luxury. We allow what could be restorable areas to degenerate and fall into disrepair and collapse. We complain that incomers force house prices up. That locals are forced out. If the employment was still available in the location, income would obviously sustain the retention of those families that wish to remain. There will always be people with "wander lust" who go over the hill to seek their fortune elsewhere.

The reasons people make visits to sites around the country are many and varied. Whilst they may set out on a day trip to view one site, the fact that they find others on the way or once at their chosen destination find more to entertain them gives a better payback. Put an antiquarian bookshop in a remote and rural location and it might, subject to the quality of the items displayed, create some turnover. Clustering a number together creates a destination with a far greater chance of survival. Jobs are created in so many areas of activity from the restoration and maintenance of the buildings to staffing premises, binding and repairing the goods for sale, and restoration of stock. As things progress, support activities such as hotels, guest houses, B&B, catering and the establishment as community services, butchers, bakers and candlestick makers as the old adage goes. Who knows if the growth justifies it you then require hospitals, entertainment, roads, rail and more to

take the developing hordes to the location! Book centres such as Hay or Wigtown and modern shopping developments such as Bicester Village prove that.

The term "Regeneration" covers all such. But where in the document does your maritime Heritage get a chance for consideration. Surely it is more than warranted for a significant part of Wales is bordered by the sea. Wales has developed through International Trade across the Sea. The first Million Pound Cheque ever was I believe drawn in Wales as a necessary part of a trading exercise. Be proud of your Heritage, not least your Maritime Past but where does it feature in your present thinking?

Remember your capital Cardiff, hosted an International conference as recently as last October to invite those from overseas who have found ways to benefit their economies from just such an understanding as to how they reaped the financial reward on behalf of their Nation States.

Should you wish for further more detailed information and views please contact the writer.

Stephen Walters

41. Gwynedd Council

General Comments

i.

Gwynedd Council welcomes the Welsh Government's commitment to achieving vibrant, viable and sustainable communities with a strong local economy. Overall, we welcome the documents' aims to regenerate our communities and achieve meaningful change.

ii.

However, we believe there is a discord between documents' vision and content. Whilst Gwynedd Council welcomes the vision, the document content does not provide sufficient detail on delivery, methodology or governance to adequately inform implementation. We have therefore expressed a number of matters that need further consideration, outlined below.

iii.

We have responded to the consultation document according to section numbers, but also provide specific responses to the questions provided.

Section 3 – Context – What has changed and where are we now?	
3.3	<input type="checkbox"/> There is no reference to European Funding wider than Structural Funding. There are many opportunities within wider EU funds that the Welsh Government will be developing a Welsh dimension for 2014-2020 (Rural Development, European Territorial Co-Operation Funds such as Interreg, European Maritime and Fisheries & Atlantic Strategy) – where coastal community interventions can align with this regeneration strategy.

Q: What is your feedback on lessons learnt from delivery to date?

We welcome the Welsh Government's recognition of the limitations of the Regeneration Areas approach.

There is a perceived lack of awareness within and across Welsh Government Departments (and more widely) in regard to the current Strategic Regeneration Areas and activity. This has caused some difficulties in terms of aligning activities/funding opportunities across interventions within localities. There needs to be a cross-departmental approach within Welsh Government to ensure that the frameworks' aims are met – with a dedicated resource in place to drive the frameworks' aims.

Current approach to programme development has not been conducive to effective project development locally. Projects were designed to fit budgetary availability and according to an imposed strategy, instead of being carefully planned on an identified need, that would ensure the effectiveness and sustainability of investment. There was also a lack of co-ordinated support in the development of regeneration projects and programmes. In future, we implore that sufficient time is given to adequately prepare projects based on an identified need, and that specific baseline indicators are established to accurately measure the impact of intervention.

There has been a discord between revenue and capital finance availability. It has been extremely challenging to fit capital funding opportunities with revenue to maximise investment impact on a local level. Lack of availability of revenue funding has created challenges in the effective implementation/sustainability of capital funding – and opportunities have been missed to maximise investment to create greater outcomes within communities.

Programmes such as Arbed have ensured a link between opportunities for work and economy, and improving the quality of housing.

There needs to be a consideration on timescale of proposed intervention. Current programmes of 3 years are in our view, too short to create meaningful change within our communities. It must be recognised that achieving structural economic change in response to market failure is achievable only through prolonged and sustained intervention over a longer period. It should also be considered that regeneration programmes are aligned with European funding programmes – this would maximise the ability to integrate activity and co-funding opportunities.

Difficulty in reaching a consensus and co-operation on a regional basis especially if resources are limited. There needs to be an dedicated resource to administrate and co-ordinate this effort.

Section 4 – Our Vision and Outcomes for Regeneration

4.1	We welcome the Welsh Government's definition of regeneration. Intervention must be justified on the basis of market failure, as this provides the underlying justification for economic development intervention by the public sector. Even where activity is justified on the premise of "opportunity" (e.g. significant private sector investment or emerging markets/key sectors), it is critical that intervention must also address underlying market failure to support
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the structural economic change required

Should other national outcomes or principles be considered?

- We welcome the Welsh Government’s flexible approach to defining positive outcomes within the framework, however we feel a few key elements are missing from the current document.
- No reference is given to “vibrant” communities within the outcomes. Outcome one should perhaps consider the inclusion of vibrant to convey the social attitudes of residents for future community sustainability. A key part of this is the sustainability of our communities, especially tackling the out-migration of young people and families.
- There is no reference to heritage, culture, creative industries and the welsh language within the stated outcomes. There should also be a reference to enterprise/entrepreneurship. These are essential to the future of Welsh communities.
- We are pleased to see that Housing is recognised within the framework especially within the third national outcome, Healthier Communities. Housing brings a number of benefits to society and is an integral part of regeneration. However there is no link to the standard of homes and how this can have a detrimental effect on families nor to the development of new build which is an important part of the economy and sustainability of a skilled workforce.
- No reference made to events which is a growing regeneration sector
- No specific reference to rural regeneration where market failure is more obvious

Section 5 – Our Principles for Regeneration

- We acknowledge that spatial planning will be a key consideration within future strategy, to make the most out of limited investment. However, careful consideration should be given to proposals for any spatial targeting, and to the future of areas that will not receive any support. Spatial targeting to the detriment of surrounding areas will not be an acceptable model going forward. Therefore, the development of strong links with surrounding areas should be a priority in any areas of targeting.
- There seems to be no reference to peripherality within the document – and the need to identify peripheral areas. Indeed, peripherality and market failure often go hand in hand, with limited private sector investment present in peripheral areas. Market failure in these areas are further compounded by access issues, such as access to markets and services.

Section 6 – Our New Regeneration Framework

What more can be done to achieve greater coherence and cross cutting action across departments?

□ We welcome the Welsh Government's aims to achieve greater coherence and cross-cutting action and would fully agree with the stated aim for joined up delivery across all sectors. However, there is no detail within the document as to the capacity or resource that will be implemented to co-ordinate/facilitate this aim. There is no indication of how the Welsh Government will co-ordinate internally between departments.

□ We would note the challenges and complexity in achieving a joined up approach between multiple organisations across differing boundaries and administrations. It is essential that no new mechanisms are established if currently existing structures can achieve the aims.

□ Whilst we fully agree with the recognition of private sector involvement, we feel there is a high expectation upon the private sector within the aim of joined up delivery. It should be recognised that the very existence of the private sector is hampered in focus areas as part of the framework (i.e. where market failure exists). Consideration should therefore be given to the realistic expectations upon private sector partners as identified in areas of limited private sector capacity.

□ In regard to procurement, we would particularly welcome efforts to ensure community benefits via practical and achievable measures that will be achievable for both delivery organisations and contracting parties.

□ We are pleased to see that the third sector is acknowledged including social enterprise, Registered Social Landlords and contact with under represented groups, who all play crucial roles within regeneration.

□ The recent announcement of £1.3 million funding for Homes and Places Communities Innovation Grant has coupled housing and regeneration and this is welcomed. However the timetable for first round of bids was very tight.

Do you agree with the national, regional and local approach set out?

Overall, we welcome the approach to the different spatial scales identified and recognition of the many levels of intervention in governance and delivery arrangements.

However there is insufficient detail on proposed delivery or definition between the balance between spatial scales, and where/how there is likely to be an emphasis on delivery. We strongly believe that there is no underpinning conflict between the genuine desire of the Welsh Government to achieve strategic objectives and local activity to respond to the needs of individual areas. Indeed, we believe that the strategic objectives will be achieved in a more successful and sustainable way by means of activity tailored to local needs. A delivery mechanism for this model is required and an indication of the resources to administrate and co-ordinate this.

As a result, there is no opportunity to identify where, when and how we can make the biggest difference to economic regeneration. We welcome the emphasis on the local level as outlined in 6.4, however consideration should also be given to sub-regional and regional models of delivery by effectively utilising local knowledge and needs.

It is essential to ensure that all levels work seamlessly together within the defined framework, and that actions are communicated and co-ordinated across all levels. There needs to be clarity and understanding at all levels on roles and delivery focus.

We would welcome the Welsh Government's recognition and utilisation of the sub-regional structures in place, such as the North Wales Economic Ambition Board. However, we would express concerns at the desire to establish new regional boards as outlined in 6.4.

Do you have any comments on our proposals for how we will target and direct our funding?

There needs to be a stronger link between actions to regenerate localities and people. Whilst we acknowledge the need for clear distinction, there needs to be a tangible link between them. As mentioned previously, there is a current discord in revenue and capital funding availability. This could partly be alleviated through synergistic programme priorities to induce integrated funding availability.

We welcome the commitment to implement Green Book methodology, however would urge that it is fully implemented throughout the programme/project lifecycle to ensure maximum effectiveness of the methodology.

We would require further discussions with the Welsh Government on the use of the Welsh Index of Multiple Deprivation (WIMD) for justifying future area eligibility.

Whilst indicative allocations of funding can lead to a more balanced distribution of funding, and not subject to distortion that competitive bidding can create – we would require further detail on the formula and methodology proposed.

The various types of intervention which is mentioned seem to be targeted at town and urban centres - rural areas are equally important and they should not be ignored.

Consideration should be given not only to need, but also to opportunity. For example, there is need in the slate valley communities of Gwynedd. Given their scale in isolation, they do not register highly as a priority on an all Wales level. But, the opportunity created through the designation of a World Heritage Site on a grouping of these communities creates considerable scope for the Regeneration Framework for Wales to 'add value' and make a lasting positive impact. Another example would be Caernarfon. Whilst the town has significant levels of deprivation, there are identified programmes of intervention that could create opportunities to address the need to create a vibrant and viable place. Allocating funding on the basis of need alone would not ensure best value for money.

When looking at the development of an empty property it should be assessed in its entirety to ensure best use is made of the whole building.

Peripherality and market failure should be included in the evaluation criteria.

We want to ensure effective monitoring and evaluation of regeneration activities, will the approach set out to achieve this?

We welcome the focus on the Results Based Accountability model, however we would encourage its full use throughout Welsh Government and partner delivery organisations – to ensure full adoption of the model throughout the programme lifecycle.

Should opportunities exist to align programmes closer together, we would propose a common evaluation framework. This would considerably aid in the comparison across initiatives, and help our understanding of the impact of our common economic development intervention efforts.

42. British Parking Association

The British Parking Association (BPA) welcomes your consultation regarding 'Vibrant and Viable Places'. I am pleased to set out below the Association's response.

After reviewing the content within your consultation, we would like to outline the BPA's views on improving the economic wellbeing of Wales, which we feel may be of interest to you. These views can also be found as part of our Annual Master Plan for Parking 2012-13, which can be viewed [here](#).

We want to see Wales' town and city centres revitalised and the role of effective parking and traffic management in achieving this properly recognised. This includes the need to allow Wales' local authorities to enforce moving traffic contraventions which will reduce congestion and accidents, and improve accessibility.

Proper and effective traffic management is absolutely essential; without this our high streets will become more congested and costs to local authorities will increase without significant economic benefits. Congestion is bad for the environment and also costly to business and commerce so Government is seeking to reinvigorate town centres. We will work with the Association of Town Centre Management and others to bring about a better understanding of the contribution that effective traffic and parking management can provide to town and city centres. Welsh Government is proposing that traffic authorities should be able to carry out enforcement of moving traffic contraventions as well as providing and controlling parking services and we welcome this.

We want to see a greater emphasis on the need to ensure that Wales' parking structures are properly inspected and maintained. Proper servicing and maintenance should be seen as a priority cost of the operation and not a call on so-called 'surplus' funds generated at the car park.

The BPA is concerned that Wales' many aging car parks are not properly serviced and maintained. Too many are prematurely reaching the end of their useful life and being closed for safety reasons. Owners and operators should prepare and implement a life-care plan and undertake regular structural safety inspections which will identify defects and prompt repairs to minimise the risk of structural failure. Closure of multi-storey car parks has a detrimental effect on the community which the car park serves and works against the regeneration of town centres.

We want to see a wider public awareness of Park Mark® - police approved Safer Parking. We want Welsh Government, police organisations and other agencies with a remit for regeneration or safer communities to become more proactive in promoting the benefits of the Safer Parking Scheme and, through the planning processes, for all new car parks to be required to achieve a Park Mark® award.

The Safer Parking Scheme, or Park Mark® as it is known to the public, is not only proven to reduce crime in car parks, it also reduces the fear of crime. It can be a major contributor to town centre regeneration and safer neighbourhoods and better promotion and public awareness will increase its popularity. The BPA has embarked on a major public awareness campaign and

we would welcome the support of Welsh Government – local and national – police organisations (whose scheme it is) and other agencies to join in this promotion.

About the BPA - Who we are and what we do:

As you may know, the British Parking Association (BPA) is the largest professional association in Europe representing organisations in the parking and traffic management sector. These organisations are many and varied and include manufacturers, car park operators, local authorities, health authorities, universities and higher education facilities, airports, railway stations, shopping centres, theme parks, construction companies, learning providers and consultants.

Currently we have over 710 members, equally split between the public and private sectors. As the recognised authority within the parking profession, the BPA represents, promotes and influences the best interests of the parking and traffic management sectors throughout the UK and Europe. As well as this work, the BPA provides its members with a range of benefits aimed at helping the professional in their day to day work.

The BPA also manages initiatives for the sector including the Safer Parking Scheme (on behalf of the Associations of Chief Police Officers), the Approved Operator Scheme (for those managing and enforcing parking on private, unregulated land) and the Parking Forum.

43. Princes Regeneration

11th January 2012

Prince's Regeneration Trust (PRT) consultation response

Welsh Government Vibrant and Viable Places:

New Regeneration Framework

The Prince's Regeneration Trust (PRT) is a registered charity which aims to ensure that historic buildings, at risk of demolition or decay, are preserved, regenerated, re-used and brought back into active community usage. As an established national charity, we have extensive experience of working with communities to regenerate a wide variety of historic buildings from across the UK. We are currently working with community groups on a number of Welsh projects, including Cardigan Castle, Crumlin Navigation Colliery, Gwasg Gee and the former North Wales Hospital, both in Denbigh and Strata Florida as well as leading the historic environment work of the Cambrian Mountains Initiative.

We feel strongly that heritage-led regeneration has a vital part to play in creating vibrant and viable places by acting as a catalyst for economic growth and occupying a unique place within communities' sense of place and identity. In addition, heritage-led regeneration has synergies with many of the key principles of the suggested framework, including community involvement, public, private and third sector partnerships and sustainability. Edward Holland, Senior Projects Advisor at PRT, joined the consultation event on the 6th December at Neath, following which we have provided a written response and supporting evidence below for your consideration.

Creating economic growth

We are pleased to see that the framework recognises the significant economic impact heritage regeneration has by bringing activity back into derelict buildings and abandoned areas, creating jobs and attracting investment.⁶ Heritage regeneration projects also act as a catalyst for wider regeneration, whilst often becoming a focal point for community action. Places that value their heritage and historic character tend to attract more visitors, have higher property prices and are generally regarded as more economically successful and more desirable places to live and work. The broad and substantial impact of historic environment on the economy was recognised in the 2010 report Valuing the Welsh Historic Environment, which found that the historic environment in Wales was a highly significant contributor to the Welsh economy, supporting 19,000 FTE jobs, whilst enhancing skills, supporting wider regeneration and catalysing investment.⁷ In addition, work by the New Economics Foundation has quantified the impact of investment in heritage as follows:

'for every £10,000 invested in heritage projects an additional £46,000 of additional investment is leveraged.... this £10,000 investment also corresponds to one job created, one job safeguarded, and the creation of approximately 41 square metres of commercial floor space.'⁸

PRT has witnessed this directly over the last 15 years as our projects have directly created 1000 jobs and been responsible for generating over £1m of outside investment in local communities. Evaluation is a key part of PRT's work in heritage-led regeneration, whether directly leading projects or supporting community groups. PRT has started work to build on existing evaluation frameworks and develop a triple bottom line analysis methodology

in order to quantify the social, economic and environmental benefits that stem from our projects. This work will further demonstrate the wide spectrum of regenerative impacts resulting from investment in heritage, particularly in deprived areas.

In our opinion the economic impact of heritage regeneration should not be limited to 'contribution to the visitor economy'. Increasingly heritage buildings are being regenerated for a diverse range of uses, whether residential, commercial or leisure (skate parks, climbing walls, circus schools), instead or in addition to providing heritage interpretation. Our approach at PRT emphasises the need to ensure economic, social and environmental sustainability of heritage regeneration projects by finding a use for the building that both meets demand and is appropriate to its historic character. Often a mix of uses will be most appropriate, combining reliable revenue streams with opportunities for locals and tourists to connect with their heritage. We are currently producing a 'How to' guide with the Churches Conservation Trust to assist community groups in business planning, recognising the need in the current climate for projects to pay their own way without large amounts of public subsidy.

Investment in heritage-led regeneration is an area worthy of government support as, despite the apparent benefits detailed above, and in numerous studies, community groups remain highly dependent on grant-giving bodies and are frequently unable to access the significant capital required to carry out regeneration work. Whilst PRT and others are working to explore innovative funding models, such as community shares, there remains a market failure, preventing heritage regeneration from achieving what it has the potential to achieve.

Preserving a sense of identity

In addition to producing quantitative economic benefits, preserving historic buildings and bringing them back to life allows communities to maintain and develop their sense of identity and pride in where they live. PRT has seen over a number of projects how regeneration has changed the way that people feel about their local area, in particular community led heritage regeneration projects, which can bring a variety of social groups together by providing a focal point common to all, often strengthened through volunteering and training opportunities. For example in the case of Sowerby Bridge Wharf, West Yorkshire, Justine Stephenson joint partner in Primo PR, a public relations agency, commented:

'It has opened up opportunities because a lot of the businesses [at the Wharf] want to work with somebody close by. This building is amazing....it's a really nice space. It's got fantastic features and it's centrally located. It's just fabulous, we absolutely love being here...it's the best place I've worked, ever. It's very inspiring. You know to just look out and see what there is, it's very inspiring, but it's also very grounding as well to know that you're here and this business is here and the building has been here for lots of years and it's just nice to be part of that really. It's like a community really. And as part of that you can be as much a part of it or not, as you want to be.'

Historic buildings, as recognised in the framework, are what gives a place a unique selling point and makes it different from the next town. Wales is

fortunate to have a wide variety of heritage buildings, with traditional buildings (listed and unlisted buildings constructed before 1919) representing 34% of Welsh building stock - the highest proportion in the UK. There is therefore enormous potential for Wales to take advantage of its rich heritage to support the wellbeing of people and communities, evidenced by the Valuing the Welsh Historic Environment report, which concluded that the historic environment enhanced civic pride and wellbeing, increased community identity, cohesion, capacity and ownership in addition to creating learning opportunities for people of all ages.⁹

Contributing to a greener Wales

Whilst sustainability is a core theme of the proposed framework, sustainability is also inherent in heritage-led regeneration. Evidence shows that the re-use of existing buildings leads to significant carbon savings; it is nearly always preferable, in climate change terms, to re-use listed buildings than to demolish.¹⁰ In addition the design of historic buildings in itself promotes energy efficiency, allowing for natural ventilation and breathability of the building's fabric.

By using existing buildings instead of demolishing, repairing and maintaining instead of undertaking large structural overhauls, buildings can preserve their embodied energy and waste can be avoided.¹¹ Demolition has significant negative environmental impact due to the need to transport and dispose of waste at land fill sites; the UK construction industry produces over 36 million tonnes of landfill waste every year, around 35% of total waste.¹² Similarly new builds have an adverse effect on emissions through the transport of materials to site. It is our view that the environmental benefits add to the case for investing in heritage regeneration over new build projects.

Partnership working

We welcome the ambition of the framework to promote partnership working as in our experience; the best results in regeneration are achieved when communities can benefit from input from the private and third sectors, facilitated by local and central government. In addition the private and third sectors have much to offer to Local Government, who are often the owners of heritage assets but may lack the capacity or expertise to maximise their potential. A new scheme to be launched in early 2013 by the Heritage Lottery Fund, the Heritage Enterprise Programme, will promote collaboration between the private, public and third sectors by providing grants to cross sector applications – details will be released shortly.

Regeneration boards

Given the reduction of the regeneration revenue pot from £65m in 2013/14 to £59m in 2014/15 and the desire to reduce bureaucratic burdens, PRT would like to recommend that the proposed regional regeneration boards are abandoned in favour of a strengthened National Regeneration Panel. The document notes that existing regeneration areas are broader than LA

boundaries and we feel that having regional boards will impose additional boundaries and bureaucracy and add unnecessary complexity, particularly when coupled with the variety of regeneration funding boundaries already in place. It is recognised that if there were no local boards the National Regeneration Panel advising the Minister would have a significant workload, so the panel could be split into three to meet each function (investment, oversight of projects and funding) with higher level meetings focusing on the research and strategy elements of the regeneration framework. Subgroups could look at specific themes such as coastal towns or heritage to ensure that best practice is shared and that emerging issues are identified and overcome.

Planning

Overall the document lacks sufficient emphasis on planning and ensuring that planning policy can as far as possible encourage and enable heritage led regeneration.

Rural regeneration

It is our view that rural regeneration is of equal importance to urban regeneration; the document would benefit from a greater understanding of the regeneration challenges which confront different types of communities. We hope that you take these recommendations into consideration and would be happy to discuss them with you in more detail as you refine the framework and move forward into the delivery phase.

44. Wales Health Impact Assessment Support Unit

'Vibrant and Viable Places – Welsh Government New Regeneration Framework

Wales Health Impact Assessment Support Unit (WHIASU) consultation response

We welcome the inclusion of health impact assessment (HIA) within 'Vibrant and Viable Places' as a tool to use in the preparation of regeneration plans, proposals and projects.

This inclusion acknowledges that HIA is a process which can enhance the delivery of regeneration and sustainable development in Wales by facilitating a consideration of health and wellbeing, identifying any potential impacts and addressing any inequality in the distribution of them in the general population - and vulnerable groups in particular. HIA recognises that health outcomes are themselves shaped by social and economic determinants and therefore facilitates partnership working across sectors, services and academic disciplines often with communities to consider how changes in people's lived environments may lead to better physical and mental health outcomes.

We welcome the recognition that HIA has a role to play in improving the prospects for people and places and wish to make a number of comments with regard this aspect of the framework.

1.1 We are happy that reference is made to the strong evidence and links between regeneration and health but some mention should also be made of HIA as part of Welsh Government's wider strategy to improve health

- and wellbeing and address health and other inequalities as part of its 'Health in All Policies' approach and not only Public Health strategies.
- 1.2 As part of this goal the Welsh Health Impact Assessment Support Unit was set up and is a dedicated resource in Wales. In future documents it might be helpful to provide a reference to the Wales Health Impact Assessment Support Unit (WHIASU), its recently updated HIA Guidance – 'HIA: A Practical Guide' and to the WHIASU website www.whiasu.wales.nhs.uk.
 - 1.3 There is a history of HIA being used to inform regeneration activities in Wales, particularly at the local and regional levels. WHIASU has worked in partnership with Centre for Regeneration Excellence Wales (CREW) to deliver training and on-line guidance on HIA. There are several successful examples of recent Regeneration HIAs completed in Wales and these are published on the WHIASU website – <http://www.wales.nhs.uk/sites3/page.cfm?orgid=522&pid=10108> .
 - 1.4 There is no definition of health. Can some short context be given? This could include the World Health Organisation (WHO) definition of health ie that it is much more than biophysical health and encompasses physical, mental and community wellbeing. We would like to see references to 'mental and physical health' throughout the health section replaced by 'mental and physical health and wellbeing'. The recognition of well being (and mental health) outcomes will be important. Many of the traditional health outcomes (such as those that focus on mortality) used to assess area health are unlikely to be measurable in the short to medium term as a result of regeneration strategies.
 - 1.5 Can the second paragraph on HIA be reworded? Suggested amended text for the paragraph could be as follows:
"In Wales, Health Impact Assessment (HIA) takes a broad approach to health and well-being and is a key tool which can be used to support a consideration of health in regeneration programmes. HIA is a systematic, objective, yet flexible and practical way of assessing the potential positive and negative impacts of a proposal on health and well-being. It highlights the uneven way in which health impacts may be distributed across a population and seeks to address existing health inequalities and inequities as well as avoid the creation of new ones. A prospective HIA can provide a useful opportunity to both maximise the potential benefits and mitigate for the potential risks of regeneration plans, projects and proposals on the health and well-being of individuals and communities, through providing realistic recommendations and suggestions for going forward. HIA can be a useful component of addressing community concerns and issues through effective public and stakeholder engagement and participation. It can also provide valuable insights to help enhance a proposal.
- The framework emphasizes the links being health and its social and economic determinants and avoids simplistic causal explanation. However on page 22 (last paragraph in health section) the document states "Deprived areas are often characterised by low economic outputs as a result of poor mental and physical health" – this indicates that poor health causes low economic outputs. However, it can be argued that low

economic outputs can both cause and be a consequence of poor mental and physical health.

45. Bridgend CBC

VIBRANT AND VIABLE PLACES CONSULTATION RESPONSE

Bridgend County Borough Council January 2013

Introduction and Executive Summary

The Regeneration Review document presents a great deal that can be supported in terms of aspiration with many of the points made by local government over recent years being incorporated. These include:

- The need for a transparent, open and evidence-based process in the allocation of funding;
- For the vital role of local government to be recognised;
- For a 'whole government' approach to the delivery of regeneration;
- For a flexible approach in terms of boundaries and recognising the need to link areas of need and opportunity; and
- Coherent regional plans so that regeneration efforts are complementary across the wider area.

However there is almost no detail on the important issue of what the strategy is how we go about delivering the strategy, what we will do more of, less of and what we need to start doing anew.

The main points in this response are summarised in the following bullets:

- Delivery should be concentrated on more strategic projects with more strategic policy and better integration and coordination at national level with local projects feeding into key regional strategies.
- There should be an emphasis on achieving national outcomes but with a spatial dimension or the outcomes are meaningless.
- The document should explicitly propose actions to tackle high levels of economic inactivity, weak labour markets and skills deficit and job creation.
- It would be helpful to give the framework some definitive timescale.
- How the WG Regeneration team will influence the objectives of the larger departments? This is not made clear.
- The main aim in terms of overall governance should be simplicity. A structure that is overly complex and centralised will make delivery virtually impossible. Decisions should be made at the lowest level possible in a structure. (basic PRINCE2 principle)
- The regional governance structure should be supported by good data.
- It's unclear what the constitution and purpose of MAG will be? Who will be the representatives? Will it be independent from WG?
- How will City Regions, Enterprise Zones, Communities First and other initiatives plus the delivery of the strategy sit together?
- The funding administration arrangements are unclear.

- There should be a move away from WG micro management of approved projects. It causes delay, removes an element of trust and introduces risk in terms of delivery.

Q1 What is the feedback on lessons learned from delivery to date?

The feedback in the document considers the experience gained from the seven Regeneration Areas (RAs) which have been the main strand of Welsh Government regeneration policy over the last few years. The benefits of establishing partnership arrangements which work across geographical, organisational and sector boundaries has been acknowledged as a strength of the RA approach. It was welcomed as a positive move in terms of ensuring that regeneration policy could be targeted spatially which, in theory, could provide the basis for ensuring resources benefited the poorest areas. In practice, however, the experience gained in respect of the Western Valleys RAs, has fallen short of expectations.

The Western Valleys Programme underperformed in terms of addressing some of the characteristic deep-seated economic issues, which stems from insufficient allocation of resources to bring about the necessary transformational changes to the areas concerned. More strategic projects capable of delivering significant economic benefits were few in number, which is also a reflection of the absence of a wider strategic policy context for the RA. There was a failure to generate significant levels of private sector interest and engagement and investment in the delivery of the strategies too. There was poor integration at national level with other key regeneration initiatives, including Communities First, housing renewal, DWP programmes and broader economic development, although some integration was achieved locally.

Q2 Should other national outcomes or principles be considered?

The regeneration framework is described in terms of supporting outcomes linked to delivering prosperous, learning and healthier communities, all of which under-pin the Communities First Programme and the Welsh Government's Programme for Government. Whilst the emphasis is on achieving national outcomes, the absence of a spatial dimension to the desired outcomes limits the usefulness of the framework as a strategic policy tool. This is similar to previous policy documents such as the Economic Renewal Programme.

Issues surrounding Wales' relatively poor economic performance, particularly in terms of employment rates and productivity, stem from the high levels of economic inactivity, weak labour markets and skills deficits evident in the South Wales Valleys. The ability to prioritise resources and actions to clearly address these deep-seated issues in the Valleys will be the key to achieving wider national outcomes, and the regeneration framework would benefit from explicit recognition of this linkage. More explicit acknowledgement of the growth and jobs agenda would also help to give the regeneration agenda a tighter focus.

It would be helpful to give the framework some definitive timescale – while it is appreciated that some of the aspirations and objectives will be long term, there needs to be a clear set of milestones against which to measure progress.

Q3 What more can be done to achieve greater coherence and cross cutting coherence across departments.

As a devolved administration, it should be possible to improve on the amount of high level coordination within the Welsh Government, particularly in respect of Regeneration, Housing and Heritage and BETS. Recent announcements surrounding the wider regeneration agenda is a good example of where the future direction of regeneration policy is linked to at least three recent policy statements – Vibrant and Viable Places, City Regions and the new Regional Planning Framework have recently all been the subject of different announcements. At the very least these should have been the subject of joint statements in order to provide a top down momentum for more effective joined-up delivery, which in turn would motivate the engagement of other Welsh Government departments and its partners in the public, private and third sectors in helping to make cross-cutting activity more commonplace.

Questions remain over how achievable the objectives are of ‘whole government’ working. Whilst much of what is proposed is commendable, the Regeneration team is relatively small in terms of staff and budget and its ability to influence the objectives of larger departments so they include a focus on regeneration will be limited. Whilst we support this idea in principle it is not yet clear how this will be achieved in reality.

The current set of proposals for three regeneration areas/boards, six Communities First regional boards and two city regions (as well as seven Enterprise Zone boards) are said to have full Cabinet support within the Welsh Government but the complexity of the proposal raises questions over how these all are expected to work together and which takes precedence. At the Co-ordinating Committee meeting on 26th October when city regions were discussed, Members made it clear that they did not want to see multiple boards being set up and that the work of the Regional Partnership Boards (RPB's) should be built upon. As the RAs' work is now more or less concluded at least we would see the end of one set of meetings, but there is a risk of them being replaced by two new Board meetings, or more.

Overall governance should be simplified and if cross portfolio working is to be truly embraced it should start at the proposed regional partnership level and this partnership should also provide the regional governance for City Regions and potentially C1st as contained in the WLGA paper for SEW Regional Partnership Board. It is essential that regional governance arrangements are supported by good data, and consideration should be given to creating regional data observatories to hold up to date data and mapping information.

Q4 Do you agree with the national, regional and local approach set out?

The key to successful delivery for Wales is to adopt the principle of subsidiarity i.e. – that decisions need to be made at the lowest tier that makes sense. So it makes no sense for Communities First to have a regional board, but equally, a sub-regional arrangement for infrastructure planning is essential. WG also need to look at internal delegations to officers, to reduce the number of decisions requiring ministerial approval.

This is an area where we are concerned that work that has already gone on to achieve a structure that is being ignored, and where new structures, if not managed with delivery as the main goal, and given flexibility to implement could slow down a process which has suffered from micromanagement for the last five years, and then been criticised for not delivering.

In particular the proposals regarding the three regeneration boards and their functions have been set out. The WLGA has Regional Partnership Boards (RPBs) that have not been recognised. Each of these boards is already evolving medium to long term regional development priorities and there is a risk of duplication or conflicts emerging.

Discussions with Welsh Government officials in WG Regeneration suggest that they would wish to build on existing plans and arrangements if they are considered fit for purpose, rather than creating new ones. The Minister also acknowledged this point at the recent Regeneration Summit in Colwyn Bay. However, it is by no means clear how the RPBs and their work to date will be viewed in this respect. For example, would all local authorities be expected/allowed to be represented? Is it proposed that the Board will also undertake a Regional Planning role – if so how will this be achieved

There remain, some fundamental questions over the constitution of the regional boards and the Ministerial Advisory Group (MAG) and their respective relationships with other groupings. In relation to the establishment of the MAG it would be important to understand how the representative individuals would be selected for this important group and more details about its remit. It appears that MAG will have a pivotal role in terms of setting the overall direction of regeneration strategy, overseeing investment decisions and considering the regional boards business plans. As such it will be a powerful and influential group where accountability and representation assume particular significance. Further clarification is required on the full role of the MAG, for example will it take on a scrutiny role? Clear terms of reference are required to prevent possible duplication between this and the Regional Board.

Composition of the group and how conflicts of interest will be avoided where representatives have a mutual interest in both the Ministerial Group and the investment plans of the regional boards. Although this may be a particular issue for local authorities, given that the WLGA is currently represented on the National Regeneration Panel, it may also be a matter for the private and third

sector representatives. At the same time, it will be important to ensure that the panel is independent of the Welsh Government if it is to advise in an impartial manner. Lastly WLGA currently represents local government on the National Regeneration Panel. However, if the MAG is to have a role in investment decisions between local authorities this would be problematic for WLGA. In particular, there is a need to resolve any uncertainty around the announcement on the city regions for SE and SW Wales, and the obvious overlap with the delivery proposals set out in the new Regeneration Framework. This needs to be addressed with some urgency, if there is to be a meaningful discussion on the constitution and responsibilities of the regional boards. In a similar vein, there are concerns on how the new boards will build on the activities of the WLGA's Regional Partnership Boards which have been developing their own regional strategies. The announcement made earlier this year regarding the future of Communities First, proposed 6 new regional boards in relation to overseeing the activities of the CF clusters, also raises issues of the potential proliferation of delivery structures at the regional level. More recently, it was announced that there would be seven Enterprise Zone Boards which again, raises concerns over relationships and coordination on the ground between a multitude of structures. Building on existing arrangements and experience is therefore important and necessary, as is the need to avoid duplication and any confusion regarding the respective roles and responsibilities of the boards proposed to date. In proposing the new framework, the consultation document introduces the discussion with references to the delivery of regeneration initiatives being a fundamentally local issue where local authorities and local communities have key roles to play. It is not clear, however, as to the role local authorities will have in terms of representation on the regional boards and how accountability will be built in to the new arrangements. Furthermore, the setting up of regional teams by the Welsh Government to support the boards could lead to more centralisation, a criticism of some of the existing RAs. Assurances with regard to local authorities having equal and meaningful roles in the new structures are sought.

Q5 Do you have any comments on our proposals on how we target and direct our funding?

Targeting resources towards initiatives which support economic growth and job's agenda should be the main imperative, together with a strong spatial dimension to investment decisions, with the focus on those areas with the greatest needs. The formula for allocating funds to the three regeneration boards should reflect these requirements.

The Welsh Government should ensure that funding decisions on other economic initiatives, such as Enterprise Zones, become integral parts of regeneration activity and local projects should feed into the delivery of key regional strategic priorities. It is also important to ensure that spreading resources over too many

investment streams does not detract from strategic investment priorities capable of bringing about significant benefits within the regeneration areas, particularly during a period of severely constrained expenditure. In this respect, close alignment with structural fund priorities will be essential in terms of leveraging in additional resources for key projects.

It is difficult to make links between WG programmes when the programmes are themselves disjointed and developed unilaterally e.g. C1st bids have been submitted but there is no real reference made to this documentation in the Vibrant and Viable Places as it has not yet been released. This document itself does not really cross reference with the City Region work either. To be able to target effectively these links should be explicit and supported across WG.

It is not clear what is meant by 'indicative allocations of funding' and what data sets or other baseline evidence this would be based on, or how it would be administered. Would the Regional Board have the powers to administer grants? – would this result in a further layer of bureaucracy in terms of project approval lines?

Q6 We want to ensure effective monitoring and evaluation of regeneration activities, will the approach set out achieve this? We must move away from WG micro managing the budgets once projects have been approved. This unnecessary management causes lengthy delays, removes an element of trust between local and regional government and in some cases actually causes implementation risks and stops projects from being delivered due to overbearing time constraints. The emphasis should be placed on the local authority at the end of the financial year to show that the money has been spent on the projects agreed and delivered the outputs required linked to the Results Based Accountability approach.

The Welsh Government proposes to embed the RBA approach into the regeneration process with the emphasis on best practice and value for money. A balance will need to be struck between what constitutes necessary data which will enable investment outcomes to be effectively monitored and evaluated. Again linking programmes and outputs is important to maximize the synergy with other projects and approaches, such as those related to the structural funds, should also be a central aim. The regional boards should be equipped with the necessary capacity to secure the monitoring and evaluation of their investment decisions from independent source.

46. Voluntary Action Merthyr Tydfil

Thank you for the opportunity to respond to the consultation document – Vibrant and Viable Places.

As a County Voluntary Council, we have taken up the opportunity to feed comments into the very thorough response that has been produced by WCVA.

Having read through their final document, I can clearly pick out comments I have made, I fully endorse the WCVA response which I believe gives a wider third sector perspective. As my comments have been incorporated I feel that from my perspective there is very little to add except for:

- to date the reformation of the Communities First Programme has been hindered, and although these are very early days in a long term programme, currently it is not at the stage it would need to be to effective in taking this forward. The new CF cluster approach, as with all new processes will take some time to bed in once established, which could result in communities not being ready to engage fully with the new process.
- When draft guidance for the SIP was produced we commented that it lacked reference to the environment, so although there are clear areas of commonality I believe that SIP's will lack in the holistic approach that would have been covered by the now superseded Community Plans.

Despite good intentions of a joined up approach I feel that our current situation will slow the intended progress, but that it is definitely worth working toward. I look forward to the final document guiding us to ensure the whole of Wales becomes a vibrant and viable place!

47. Cynon Taf Community Housing Group

Vibrant and Viable Places Consultation Paper

Cynon Taf Community Housing Group's response:

Thank you for the opportunity to respond to the consultation issued in October. As a housing association working in the east and south valleys of the County of Rhondda Cynon Taf, we have a vested interest in ensuring the Welsh Government's strategy for regeneration is fit for purpose.

We also have a part to play in delivering such regeneration. Our investment in WHQS and other improvement programmes; our involvement in the Low Carbon Town initiative in Aberdare; our new build programme throughout our area of operation and our eco terrace project in Penrhiwceiber all demonstrate our activities in the regeneration of the communities in which we operate.

Overall, we welcome the consultation: it is important for there to be a strong and coherent regeneration strategy to set out the Welsh Government's vision for the future.

We also welcome the fact that the framework seeks to align its national outcomes to those of other programmes (Communities First). In addition, it is encouraging that the framework advocates the key principles of partnership, strategy and sustainability.

However, it is disappointing that the document lacks real vision: in tone and language it misses an opportunity to be inspirational, and is bland and a bit boring.

Overall, we are of the opinion that the regeneration activities of national, regional and local deliverers must be set in the context of an overarching spatial plan, and that such a plan needs to take the long view of 20 – 25 years.

Alongside this there needs to be a statement of the overall objective of regeneration - a future 'direction of travel' e.g. instigating a new economic development/regeneration agenda for Wales.

Within this national plan should be local, neighbourhood regeneration initiatives that are capable of being properly resourced in terms of finance and management. This would give the opportunity for there to be targeted action that could encourage programme bending to maximise effect.

The framework makes reference to research, but does not give examples of either this or best practice. More is needed from the case studies/short evaluations to inform the proposed future policy/delivery approach.

Similarly, although reference is made to outcomes, these are not specified and when implied, are more about outputs and processes than outcomes.

We would suggest that the importance of regeneration practitioner skills, qualities, knowledge and experience should be better recognised. This would enable the lack of these to be similarly recognised as reasons for failure.

Anyone engaged in regeneration would accept that it is difficult: there should be an attempt to understand why this is so. It is not only a question of resources, but often about 'Turf Wars', and unrealistic expectations about the time and effort that sustainable regeneration requires. An investigation into current experiences about regeneration (warts and all) would have helped e.g. regeneration takes a generation or a couple of decades; a total place or total solution is required; regeneration is both an art and a science

There is reference to housing-led regeneration, but our experience of working in Penrhiwceiber (for example) has demonstrated how slow and frustrating a process this can be – especially when there is a lack of a 'sexy' project (such as a new library or health centre) to act as a catalyst for investment. There needs to be some clear, positive and demonstrable objectives for local authorities in order to encourage and then evaluate regeneration activities.

There is a danger that chasing funding will result in lost opportunities to collaborate: there would need to be a shared vision for partners that would enable plans to be amalgamated.

Other comments would include an observation that the way in which funding decisions will be made is unclear, and that the regional structure proposed does not appear to be supported in terms of resources.

The document identifies £35M allocated specifically to this framework, but we would support Community Housing Cymru's argument that the whole of the Welsh Government's budget (£4.3B) should be considered as potential regeneration resources.

We would also urge that the health sector is given clear objectives to use its considerable financial and other resources to engage in the wider activities of regeneration. There is growing evidence that the health boards understand the wider implications of their work on local communities, but outcomes are patchy and embryonic.

Finally, we are concerned that the document lacks any acknowledgement of the barriers that inhibit projects being developed, including the culture of Welsh Government. Centrally, there is a lack of consistent application and approval processes, and these are the kinds of barriers that prevent the private and third sectors getting involved.

We hope that these comments are of help, and look forward to seeing the agreed strategy later next month.

Antonia Forte
Chief Executive
11th January 2013

48. Gwalia

WELSH GOVERNMENT CONSULTATION DOCUMENT VIBRANT AND VIABLE PLACES – NEW REGENERATION FRAMEWORK
RESPONSE OF GRŴP GWALIA CYF.

In compiling this response, reference has been made to the questions posed within the document along with the page reference number:

Page 9 What is your feedback on lessons learnt from delivery to date?
Area-based regeneration approaches such as Strategic Regeneration Areas or Housing Renewal Areas are positive and beneficial means that achieve a concerted and focused spatial and sectoral regeneration outcome. Not only does such an approach target financial resources towards a given geographical area, it allows for organisational and ‘people-based’ resources to come together and pool ideas, resources and projects to deliver longer term outcomes. Inevitably, such geographical programmes create ‘boundary’ effects depending upon which side of a line on the map a project is located. Therefore, in parallel to the area-based approach, a sectoral-based programme could develop to ensure that good projects are not overlooked. Most importantly, early lessons being learnt and which could continue to develop are those associated with ways of working in terms of collaboration across areas and sectors, partnerships between sectors and a greater emphasis on strategic, forward planning. These elements are especially important during times of financial stringency and need to be supplemented by a longer term outlook to regeneration funding that is not dominated by an ‘April 1st to March 31st’ mentality as problems are deep-seated and require long-term regeneration solutions whilst many projects need considerable lead in timescales to ensure that they deliver satisfactory outcomes.

Other lessons that have emerged include those associated with funding packages. For example, the predominant source of public funding accessed by the RSL sector is Social Housing Grant but when entering the realm of regeneration funding issues associated with double subsidy and State Aid have arisen that prove counterproductive in assembling a viable project funding package. Similarly, when progressing a City Centre conversion and refurbishment mixed retail and residential scheme, it was discovered at a late stage in the feasibility study that any residential component of an elevation was not eligible for building enhancement grant funding, again something which would seem counterintuitive to the essence of many town and city centre mixed use, housing-led regeneration projects. Finally, it is clear from experience that a regeneration requires strong leadership, co-ordination and relationship management skills to bring together sectors and organisations.

Page 12 Should other national outcomes or principles be considered?
The outcomes stated address each of the social, economic and environmental components of the WG definition of regeneration. Importantly, the outcomes

and vision statements place great emphasis on collaboration and programme alignment within WG. This needs to be similarly reflected at sub-regional and local levels. Similarly, the role of the private and third sectors must be acknowledged in delivering outcomes. Furthermore, outcomes should be directed towards creating less dependence on 'state' support in whatever guise that might take over and above financial support.

Page 23 What more can be done to achieve greater coherence and cross cutting action across departments?

It is encouraging to note that the RSL sector and the wider housing agenda are both considered as key components to the regeneration framework. The skills, expertise and resources capable of being generated by the sector are considerable and substantially address each of the cross cutting themes. In identifying further action to assist the housing sector in the context of the framework, some of the following points are noted:

- specific reference is made within Page 15 to tackling difficult sites to release good quality developments. To deliver such outcomes will have financial resource implications in terms of infra-structure, remediation of contaminated land or servicing of sites. As such, and in the context of financial stringency, two elements will be especially important: first, the role of the planning system will be key to ensuring quality development is capable of being realised, but which is not overly regulated. The opportunity exists at present for the planning system to make a major and positive contribution through the Local Development Plan preparation process and the Planning White Paper. Second, a multi-agency approach will be key to success that draws together all sectors and regulatory agencies toward the common objective e.g. Dwr Cymru Welsh Water, Environment Agency etc. often provide barriers to development without a degree of accountability;
- in times of limited grant funding, the release of public sector land for development will be important using principles of 'best value' and not necessarily 'best consideration/price'. By doing so, significant investment will be capable of being generated for a variety of activities and uses;
- upskilling in the spheres of programme and project management and governance but that these elements are the means to an end, and not an end in themselves that stifles creativity and innovation;
- it must be acknowledged that the spatial dimension to housing need does not always match regeneration area designations and so a flexible approach needs to be maintained for new social and affordable housing investment decisions;
- there needs to be clarity on the application of regeneration funding to delivery of social housing given the presence of Social Housing Grant programmes i.e. avoidance of double subsidy, State Aid etc. Similarly, in a very practical example, certain town centre mixed use schemes are stifled by the inability to access building enhancement grants for elevations that have a residential component, thereby undermining a key pillar of the social and economic regeneration of town centres;
- consistency of approach to procurement whereby it is consistently acknowledged across all WG investment programmes that lowest price

or tenders do not always provide best value, especially in the context of delivery of wider community benefits;

- it is reiterated that strong co-ordination, leadership, relationship management and empowerment will be vital elements to achieve the necessary coherence to programmes.

Page 26 Do you agree with the national, regional and local approach set out? The three tiers appear to have coherence in ensuring the necessary strategic thinking and investment decisions are made for beneficial regeneration outcomes. To supplement such a view the following considerations are outlined:

- the role of collaboration and regional groups are key given that the local level alone may not be sufficiently strategic in its thinking and decision – making;
- local authority resources are stretched at present and whilst collaborative working across boundaries and sectors will assist, efficient and effective use of existing resources will need to be monitored;
- geographical dimension to regional groups will need careful definition and delineation so as not to reinforce existing disparities and stereotypes;
- political and governance arrangements for regional groups will need careful consideration to avoid undue local interest issues undermining sub-regional or regional strategic requirements;
- the structure must be streamlined and flexible and not establish a cumbersome, resource intensive apparatus that stifles creative thought and innovation;
- the structure must have inherent flexibility to allow two-way travel of ideas e.g. ‘top down’ and ‘bottom up’;
- there is a need for accountability of organisations within the delivery of regeneration programmes which may require a form of referral mechanism for potential local conflict resolution.

Page 34 Do you have any comments on our proposals for how we will target and direct our funding?

In making some general comments, it is considered that the approach is generally positive as a way forward to target and direct funding. The following observations are offered:

- it is noted and considered positive that ‘outcomes’ rather than simply ‘outputs’ from physical capital investment projects are to be the focus for the framework;
- an evidence-based approach is sound and when allied to the mapping exercise for baselining it is considered especially beneficial. However, the mapping exercise needs to be inclusive and consistent to all sectors;
- the emphasis on people-based outcomes is equally positive. However, again a consistent approach is needed when appraising schemes for public funding investment as to best value versus best practice in tender terms as many of the people-based outcomes might not be apparent or realised in adopting a straight lowest price approach;

- Town Centre investment is pivotal to the creation of ‘place’ and community interaction. In this regard, the regeneration framework should establish the building blocks and conditions of a social, economic and physical nature which are requisite for generating investment and value by other sources such as the private sectors. Moreover, it is fundamental that town centres reinvent themselves given pressures and competition from other sources in the retail sector e.g internet, out-of-town. Housing, community, social and cultural activities and uses are considered key to delivering such outcomes for town and city centres;
- Delivery of housing-led town and city regeneration may necessitate something of a relaxation of standards such as Development Quality Requirements when funded through the Social Housing Grant route given that projects such as HARP schemes and empty property initiatives are complex in their delivery and do not always conform to such standards whilst providing suitable accommodation. This is not seeking lower quality but recognises scheme complexity and practicality and is safeguarded through the planning and building regulations systems;
- timescales and durations of programmes including the reduced emphasis on annuality are key to delivering long term place-based regeneration, especially given the symptoms of persistent deprivation identified on page 29 of the document. By definition, tackling some of these symptoms require concerted efforts over more than one financial year.

Page 34 We want to ensure effective monitoring and evaluation of regeneration activities, will the approach set out achieve this?
Adoption of a consistent methodology for baselining and subsequent monitoring and evaluation is positive. However, it is important that such a methodology is flexible and proportionate in its application to reflect the scale of the investment, programme and project.

49. Penarth Town Council

PENARTH TOWN COUNCIL RESPONSE TO WELSH GOVERNMENT VIBRANT AND VIABLE PLACES CONSULTATION

Penarth Town Council has taken the opportunity to consider the Welsh Governments consultation on Vibrant and Viable Places and it wishes to submit the following comments:-

General

Effective regeneration requires active and meaningful long-term community engagement and involvement, as well as changes to the physical environment.

We note that the New Regeneration Framework is a very high level strategic document with little detail, as this is planned to come out of the work done by the three proposed Regeneration Boards.

What is your feedback on lessons learnt from delivery to date?

We note the report by CREW (Annex 3 to the Framework) finds “that common themes exist in all the approaches examined. In particular combinations of policies which address the ‘people’ and ‘place’ agenda have characterised all the policies reviewed. A focus on area-based initiatives has also been a common feature in the periods considered and there is a general consensus that delivery at an identified spatial level is a core component of successful regeneration”. We would recommend highlighting this factor.

Local

The role of local authorities in articulating delivery whilst it is central ignores the role of elected grass roots, community and town councils, which are not mentioned. They will often be crucial to initiatives and engagement and understanding of place, where Unitary Authorities may not have such detailed understanding. They could be useful in linking need with opportunity and long term view. The Town Council which has wellbeing and tax raising powers can complement initiatives thereby assisting gearing. Small amounts of money if directed through community and town councils could have highly effective outcomes.

Yours sincerely

Shan Bowden

Town Clerk

50. Conwy CBC

VIBRANT AND VIABLE PLACES – New Regeneration Framework

Conwy County Borough Council welcomes this consultation document and the opportunity to respond to it. In recent years many communities in Conwy, through Conwy County Borough Council and its partners, have been able to benefit from the Welsh Government’s Regeneration Area programme as a consequence of the inclusion of the NE of the County in the North Wales Coast Regeneration Area. This has enabled the local Bay Life Regeneration Partnership to make significant key investments to provide sound foundations for the regeneration of Colwyn Bay in particular. Colwyn Bay, particularly its central wards, is seen by the Wales Government and the Council, as one of its areas of greatest need. However, the Council also recognises that it has other areas of need, particularly as defined in its Communities First Cluster proposals, and that regeneration is a process which takes a number of years before real benefits are felt by the community. Whilst fully understanding and indeed appreciating, the need for review and the development of a stronger

regeneration framework nationally, the Council would urge the Welsh Government to benefit from some important lessons that have emerged and build on recent good practice to ensure that processes of regeneration and renewal that have started in some communities continue to be supported, so as to realise the anticipated benefits in full, rather than be abandoned, which none of us would wish to see happen

Following wide consideration by both officers and Members, the Council would like to offer the following responses to the specific questions raised by Welsh Government in the consultation document:

1. What is your feedback on lessons learnt from delivery to date?
CCBC have been successful, and grateful, in to date, obtaining focused Welsh Government support for its regeneration strategy through the North Wales Coast RA, Communities First and Rural Development Plan in particular. These initiatives have all been successful for us to a degree; however, in going forward we believe that we can all learn lessons from practice to date, be it at a National, regional or local level.
 - There needs to be greater co-ordination of funding opportunities, plans and strategies – too often there is evidence of duplication of work and effort as WG and WEFO priorities have not been made sufficiently clear nor were properly aligned for maximum benefit or integration.
 - Every initiative has a different bureaucratic system and outputs or outcome targets. This serves not only to confuse and discourage potential partners in the third and private sectors, but it also detracts from the potential for integration, be it local, regional or national, and again reduces the impact that valuable resources could have on a community.
 - The use of deprivation indices as the key indicator for regeneration policy has served to put rural areas at a massive disadvantage. Any future approach needs to recognise this and react positively so that communities throughout the whole country are considered equally and equitably.
 - The RA initiative spread a limited budget too thinly and whilst promising a holistic approach either did not provide funds directly or have sufficient 'clout' to successfully 'bend' other departments' budgets or delivery to provide a holistic solution. As a consequence undue emphasis has been placed on physical infrastructure. We would suggest that many Community First partnerships have experienced similar frustrations. It has been disappointing in the N Wales Coast RA that funding has not been available or seemingly directed towards social, health or economic outcomes, unless from community based initiatives.
 - Greater consideration should be given to balance capital and revenue support. The consultation document recognises the need to balance investment between place and people, and we suggest that a more balanced funding approach would help achieve this and at the same time would avoid some of the issues such as those mentioned above.
 - To avoid duplication, where applicable, WG should ensure that funding applications/plans brought to them have been properly consulted, and

been integrated into locally targeted geographic initiatives such as Community First, or the RAs. There have been examples of 'new initiatives' coming from WG departments, and/or other national bodies which duplicate each other and often have the same 'beneficiaries' as their outcome targets.

- Long term planning is needed with the ability to carry funds forward from one financial year to the next and deliver a rolling programme. This is not just a 'year end' problem but also one of timing at the outset of a project/initiative, which can often take some 6 months to set up. This too often places undue detrimental pressure and expectation on a team or community to realise outputs/benefits.
- Need to encourage more joint projects with private sector and universities to ensure longer lasting and immediate benefits, but also to positively foster innovation and real partnership working. This is applicable to all sectors and elements of regeneration, not just business/economic growth.
- It is important that the needs and opportunities identified through this framework are aligned with those of other plans and strategies. For example, does the Wales Infrastructure Investment Plan ensure that those communities with most need and opportunity are being provided with the right infrastructure Broadband, transport, health facilities, etc? It is generally accepted that the right infrastructure is crucial to the regeneration of a community, be it to deliver the opportunity there or provide it with access to that opportunity or new opportunities.
- In the North Wales Coast RA we have witnessed a largely housing led regeneration programme. That has its benefits of course but it can only be successful if it is balanced by other investments that ensure that there is a sustainable vibrant community with economic and social opportunities for the residents.

2 Should other national outcomes or principles be considered?

Whilst we cannot criticise the paper's definition of regeneration or the stated vision per se, we are left with the feeling that they are neither unique, nor specific to Wales. Wales has a unique cultural, environmental, economic and physical heritage which we should be both proud of, build upon and use to make the most of our advantage. Only through integrating this into our plans going forward can we provide firm foundations for the regeneration of our communities. This needs to run through all three outcomes as a 'golden thread', as well as being iterated in the vision statement.

It is perhaps typical of regeneration documents that we write them in a manner suggesting that we are at 'rock bottom'. As a nation we are not and we have a great many successes to champion, as the research supporting the consultation paper highlights. Therefore it would be good to see more wording along the lines of 'building upon', or "making linkages to". For example, in reference to 'Prosperous Communities', perhaps we should be much more positive about our key sectors and the opportunities they offer. We need to ensure that we make the most of the Enterprise Zones and their potential. We must ensure that the employment opportunities created in them provide a basis for skills development in a broader range of communities and ensure that those communities have access to the opportunities. This is an

underpinning principle of the work and priorities of the North Wales Economic Ambition Board, which we in Conwy are fully supportive of.

Infrastructure obtains a 'very light touch', yet is so crucial and increasingly so away from large urban conurbations where subsidy will be required to ensure communities have access to opportunities. In addition there are two bullet points which we consider have been missed out in the described outcomes, which are:

- Access to Services, and
- Tackling fuel poverty.

It is crucial to the realisation of true and lasting regeneration that investment and progress is made in respect of all three 'outcome areas' in a coordinated and balanced manner.

3 What more can be done to achieve greater coherence and cross cutting action across departments?

We have raised a number of issues relating to this question in answering question 1 above, and it is crucial to delivering on the last point we make under 2 above. However, a few other points do come to mind when considering this question and the supporting text:

- In the N Wales Coast RA an element of community work been managed by WG, the RWE Fund. Going forward we would suggest that such funds should be managed locally leaving the WG team free to influence other departments and their policy making to ensure greater coherence at a strategic level.
- Does the community have the capacity/will to deliver community engagement as proposed in the paper?
- Needs recognition of rural communities, not just Communities First. It is perhaps surprising that the paper makes little reference to the Leader approach and how that may be utilised more broadly.
- More work related to best practice, rather than new initiatives.
- There needs to be a review and streamlining of how WG and associated bodies deliver initiatives, eg:
 - too many agencies involved in delivery of apprenticeship opportunities
 - public bodies should ensure that wherever possible there is compatibility of geographic operational areas, we will discuss this further under question 4.
- There is a tension between different strategic elements in respect of procurement, in terms of efficiency versus community benefit that needs resolving. Welsh businesses have an important part to play in the regeneration agenda. We must ensure that they are both equipped to undertake and deliver contracts as part of the regeneration programme, but also fully appreciate, and are supported in, their role in providing community benefits through job and/or training opportunities.
- If an area receives compensation funding, then that funding should be ring fenced to that area and not distributed more widely. Eg it is the North Wales coast which has been impacted by the off shore windfarms yet the Coastal Communities Fund, derived from The Crown Estate's rental income generated as a consequence of these investments, is available to all Welsh Coastal Communities.

- A stronger reference needs to be made of the significance of, and the need to fully integrate the full range of infrastructure investment with regeneration programmes and priorities.
- Welsh Government should make every effort to ensure that other significant external funders, eg Lottery and Coastal Communities Fund, are aware of the regeneration framework, its vision and outcomes approach and be proactive in encouraging them to follow the same approach in their delivery within Wales.

4. Do you agree with the national, regional and local approach set out? In general we welcome this more strategic approach but would caution the WG not be too prescriptive of how it operates. The proposed regions, certainly for North Wales, make sense but the local level may be tackled in differing manners and needs to be agreed at that level. It would suggest that there needs to be a certain amount of reconsideration of the Spatial Plan in recognising the areas of need and opportunity. We in Conwy may well wish to continue to work with Denbighshire County Council on the basis of the North Wales Coast RA area, or at least consider the NE of the County alongside Rhyl.

- The balance of need and opportunity can be made at regional and local levels, appreciating that the economy and society in general do not recognise administrative boundaries. E.g. we need to ensure our communities in Conwy have access to the opportunities that will be available within the Enterprise Zones to the east and west of us.
- A regional partnership needs to be given the freedom to decide on those priorities and the WG regeneration team should aim to work with that partnership to assist implementation and influence other government departments to recognise the advantages and priorities so as to ensure a holistic strategic-led approach.
- The regional body needs delegated responsibility to avoid becoming a 'talking shop'
- Reinforce and support existing structures rather than the creation of new ones. The N Wales Economic Ambition Board has already recognised many of the issues and priorities which you have raised in this paper. We would suggest that the Board is well placed to develop itself and its operational structures so as to take on the regional role suggested in the consultation paper.
- Clarification needed as to how we integrate with and add value to existing programmes which have a geographic context, eg Communities First or Health Trust operational areas (eg Conwy split into 2)
- The regional approach needs to recognise the varying needs and opportunities and encourage their integration
 - More reference to key economic sectors as a foundation for regeneration, e.g. the priority sectors of the N Wales Economic Ambition Board.
 - More emphasis on SME development to create employment opportunities
 - Need to consider conservation/regeneration collaboration

- Enterprise Zones designations provide an opportunity for everybody within a region, and we must ensure accessibility for communities of need.

We strongly believe that the creation of a National Panel/Advisory Group would add an unnecessary layer of bureaucracy. We suggest that the Welsh Government should focus on the stronger alignment of funding and national strategies and relaxing controls so as to enable a stronger local focus for delivery and realisation of benefits. This approach should include the development of a common application process at the core of each initiative/programme and the use of a single reporting mechanism would help free up resources to enable more focus on delivery and realisation of benefits to the communities affected.

5. Do you have any comments on our proposals for how we will target and direct our funding?

We congratulate the Welsh Government on their suggestion to set firm criteria and leave local and regional partnerships to decide on priorities using a strong evidence base which recognises both people and place. We must emphasise though that it must be done with support from WG's regional regeneration offices rather than control by those offices. Equally though, to attain the integrated regeneration aspired to other key WG departments need to adopt the same principles and encourage the engagement of their delivery partners in the regeneration process, eg education at all levels but particularly FE/HE. It would be unrealistic to expect a Regionally Integrated Community Strategy. At a regional level themes and targets can be agreed but it will be at a local level that integrated delivery plans and initiatives will be developed to realise and contribute to these.

It is perhaps here that we should raise the issue that the framework document is written in a manner which suggests that from a funding perspective Wales is a level playing field. Of course it is not, the largest factor being the imbalance of structural funding. However, WG and WEFO should task the regional bodies established, as a result of this process, to encourage and ensure regional collaborative working and benefit of the EU investment. The cross fund collaboration being suggested by WEFO in respect of individual EU funded programmes also needs to be encouraged within the WG.

It is perhaps, in respect of this latter point that we should raise again the need to consider both urban and rural regeneration in the same framework, appreciating the dynamics and dependencies between the various communities. We feel it is crucial to reconsider how we measure and recognise deprivation, taking account of the smaller rural communities. Equally more regard and emphasis should be allowed to the potential of 'rural growth zones' alongside Enterprise Areas, as the focus of opportunity realisation.

We have mentioned earlier the recurring issue of annualised financing of regeneration and associated projects and the undue pressures this places on project delivery. It is important that Welsh Government is able to resolve this and create budgets for the life of projects and the establishment of rolling programmes.

In our response to earlier consultations relating to the effectiveness of

Structural Funding we have suggested the reintroduction of Targeted Match Funding from Welsh Government would be of major benefit. We would like to reiterate this view as it would positively reinforce the approach being suggested in the consultation. This also emphasises the need to ensure the integration of the outcomes of this consultation with the future EU funding programmes, and their priorities post 2013.

WG, through a body such as CREW needs to be continually considering and sharing knowledge of innovative funding approaches, and allowing regions or local areas the opportunity to pilot them.

6. We want to ensure effective monitoring and evaluation of regeneration activities; will the approach set out achieve this?

We would encourage and support a move towards Results Based Accountability, but again there needs to be a consistency of approach across WG departments so that there is a national framework which everybody is working to, with accepted definitions. This may work on a pyramid basis with a broader basket of outcomes that can be referred to locally being refined and contributing to smaller suites of outcomes at regional and national levels.

Whilst there are no specific proposals in the consultation paper we would raise the following points to be considered in finalising proposals:

- Consider results relevant to both urban and rural contexts.
- In respect of town centres consideration of the benchmarking and evaluation work undertaken by the Association of Market Towns and the Association of Town Centre Managers should be taken into account.
- We need to consider the extent to which people move around a region for economic or leisure purposes. The benefits may be realised far beyond the area where the result is.
- It is important that the criteria and definitions are set at the outset and not added or amended part way through a programme/project, so as to provide clarity of purpose but also avoid confusion or undue bureaucracy.
- We believe there is great potential to use the 'Outcome Agreements' between Welsh Government and Local Authorities as a basis for a common measuring process for the delivery of regeneration outcomes.

In conclusion, we would again like to thank the Welsh Government for this opportunity. We trust that the above comments are taken in the constructive manner in which they are intended. As a Council we are only too aware of the significance and extent of the regeneration agenda and as a Council we want to play a full part in delivering these improvements for our people and their communities.

To achieve a co-ordinated and coherent approach to the satisfaction of all communities is a massive endeavour and we applaud the Welsh Government for its proactive and inclusive approach to this policy area.

It is appreciated that all levels of government have a part to play in the agenda but we would urge you to remember that the real benefits are those realised and experienced by our individual communities. Their engagement and involvement in the regeneration process is crucial. It cannot, therefore, be emphasised enough how important that a properly resourced and empowered local approach is to the agenda and success of the new framework.

51. Keith Thomas, PER Consulting

Further to the recent consultation on a New Regeneration Framework for Wales I wish to make the following observations and comments in respect of the six key questions raised as follows.

1. What is your feedback on lessons learnt from delivery to date?

My experience in delivering and advising on economic regeneration in Wales spans over 20 years and is also contrasted with wider experience from working across the UK. My greatest concern is that despite best intentions we still appear to be facing the same intransigent problems for more than two decades. Whilst at long last “Regeneration” has been recognised as a specialist area worthy of Ministerial responsibility the fundamental “needs” of regeneration are both deep rooted and truly cross-cutting. All too often we see different policy responses to the same problems and the re-invention of delivery bodies and yet more new governance structures not to say a plethora of programme managers competing for limited resources with no real evidence of joined-up thinking or delivery.

The approach to spatial prioritisation through the Strategic Regeneration Areas and partnership boards began in part to address the need for deeper focus and greater integration but in some ways this began to be diluted as pressures mounted to designate new areas which didn't really fit cohesively and single place Regeneration Areas which didn't necessarily need the same approach to delivery. We seem to grasp an idea and then run with it in total isolation whereas we need to be far more creative and flexible in adapting and evolving more locally coherent delivery mechanisms and governance structures. For example, the success of the URC model in Newport was never going to be repeated simply because it didn't fit with political idealism in Welsh Government – and yet such a commercially focused development delivery vehicle may have been far better placed to realise the ambitions for Swansea City Centre or Aberystwyth rather than a RA partnership board!

Going forward, Welsh Government need to be much more open minded about the delivery approach to take and be ready to adopt different solutions for different problems and different priorities in different places – regeneration cannot be a one-sized fits all solution.

2. Should other national outcomes or principles be considered?

I must admit I don't fully recognise the proposed national outcomes which don't appear to follow the same principles as set out in the Programme for Government. I also worry that we appear to be re-inventing the wheel and will end up over-complicating the regeneration priorities which become an all-embracing, do-everything strategy which lacks focus and direction.

As currently presented, the list of Outcomes/Priorities implies funding could be applied to any of these from the Regeneration “Pot” whereas other Government Divisions have much stronger programmes and responsibilities for delivery.

3. What more can be done to achieve greater coherence and cross cutting action across departments?

If these are to be the defined “national outcomes” there needs much greater integration between what delivers what and where so the different departments can be seen to be delivering on a joined-up agenda. What is the contribution to the regeneration agenda from BETS? What initiatives are in hand to address access to jobs? How does Communities First programme and Education priorities address the ambition for learning communities? What then, is the focused role of the regeneration division to realise the “join-up” of these other activities and avoid duplication of management and resources?

4. Do you agree with the national, regional and local approach set out?

No I don't agree! I fear this creates more layers of governance and administration which fails to get to the focus of local need and risks duplicating efforts of other existing and emerging regional bodies. Recognising the severe funding constraints Welsh Government is currently under I would have preferred to have seen a more pro-active decision taken to define regeneration challenges and to identify spatial priorities for intervention. This could have been a reduced number of RA's to continue for 3 – 4 years to capitalise fully on the work to date in key areas.

5. Do you have any comments on our proposals for how we will target and direct our funding?

I fully support the vital need for more rigour and informed evidence to support investment decisions. Much greater reference to Green Book and Value for Money appraisals is required and a more responsive set of output/outcome indicators are required to focus attention and realise effective delivery. I would urge consideration of two stage process in funding decisions. The Green Book Options Appraisal should be a fully informed and impartial evidence based tool to determine the need and benefits to arise from proposed project. This should be presented separately from the “Funding Bid” which is then better able to articulate the policy fit, rationale and need for the project more effectively.

6. We want to ensure effective monitoring and evaluation of regeneration activities, will the approach set out achieve this?

Again I fully support the ambitions for more effective monitoring and evaluation which should be seen more than a simple “tick-box” process to go through as part of the funding obligations. Through more effective use of the Green Book process in determining project commitments, more bespoke and project specific objectives, outputs and outcomes can be identified rather than generic funding programme objectives. This in turn will inform the data management and monitoring requirements specific to the proposed project and which should be fully documented in the funding application. Greater use of independent “gateway” reviews should also be incorporated encouraging

more effective integration from cross-divisional teams within Welsh Government and other partners and to help imbed the “learning” process from the evaluations.

52. Wales Council for Voluntary Action

Wales Council for Voluntary Action

A response to the Welsh Government consultation document Vibrant and Viable Places

1. Introduction to WCVA

1.1 Wales Council for Voluntary Action represents, campaigns for, supports and develops voluntary organisations, community action and volunteering in Wales. It represents the sector at UK and national level; and together with a range of national specialist agencies, County Voluntary Councils, Volunteer Centres and other development agencies, it provides a support structure for the third sector in Wales. It has over 3,000 members, and is in touch with many more organisations through a wide range of national and local networks;

1.2 WCVA’s mission is to provide excellent support, leadership and an influential voice for the third sector and volunteering in Wales;

2. The Welsh Government Consultation on Vibrant and Viable Places

2.1 WCVA on behalf of the sector is pleased to have the opportunity to respond to the Welsh Government’s consultation document, Vibrant and Viable Places.

2.2 WCVA believes that this consultation on the Welsh Government’s regeneration policy is an excellent opportunity for third sector organisations to help shape and influence the outcome. We have circulated a briefing about this consultation document to our members and alerted the sector to the Welsh Government consultation events that took place. We have also received feedback and guidance from our members which has been reflected in our response;

2.3 This consultation on the Welsh Government’s new regeneration framework is an excellent opportunity to mainstream the new regeneration framework, and join up complementary programmes and activities under the auspices of the Programme for Government, and ensure these are aligned as far as possible with Europe 2020 goals to leverage and maximise investment for all key stakeholders and partners in delivery;

2.4 WCVA believes that this consultation, and the imminent consultation on European programmes 2014-2020 creates the opportunity to focus minds on the anti-poverty dimensions of regeneration policy and programmes, and to ensure that mainstream government programmes are ‘regeneration proofed’ (and assessed for their anti-poverty impact);

2.5 WCVA also wishes to emphasise the role played by the third sector in community led regeneration, contributing to growth, to minimising poverty and to building sustainable and resilient communities. The Vibrant and Viable Places consultation provides us with an opportunity

- to ensure the sector's role as a strategic partner is maximised at all levels;
- 2.6 We believe that this consultation represents an important strategic opportunity for the third sector to place third sector programmes and activities at the centre of cross cutting policy areas such as regeneration, anti-poverty, co-production and co-design, sustainable development and European Structural Funds 2014-2020 and ensure that the third sector footprint is firmly embedded;
3. The WCVA's overarching response
- 3.1 WCVA believes that this regeneration review comes at an important political moment, and we have prioritised our response to ensure that the connectedness between the new regeneration framework, and other policy and programme areas of priority to the third sector (including the Tackling Poverty Action Plan, forthcoming European Structural Funds 2014-2020, the co-design and co-production and sustainable development agendas) are strengthened;
- 3.2 As noted, the proposed new regeneration framework has strong policy and delivery links to the Tackling Poverty Action Plan, which is scheduled to be 'refreshed' in June 2013; to Communities First and also to the goals of Europe 2020 and European Structural Funds. We recommend that these links are strengthened in the final document;
- 3.3 We welcome the whole Government approach whilst being mindful that there are significant challenges in ensuring that this whole Government approach cascades from the national to regional to local and finally to the community level. ¹³ WCVA endorses the view that a whole government approach is the only way in which cross cutting on key areas – jobs and growth, tackling poverty, and promoting sustainable and inclusive growth - can be delivered. A whole government approach should also serve to mainstream the new regeneration framework cross government departments;
- 3.4 WCVA welcomes the key messages in the consultation document and agrees with the Welsh Government that making it happen will require partnership working from all stakeholders. Moving forward, it will be important that the third sector is treated as a strategic and equal partner and at all levels;
- 3.5 We believe that it is vitally important the views of communities are taken into account, and that community led regeneration is supported and enabled in the context of national goals and outcomes and regional and local levels of delivery;
- 3.6 We wish to emphasise that the diversity of organisations in the third sector provides a voice for under-represented groups campaigning for change, and helps create strong, active and connected communities whilst promoting enterprising solutions to social and environmental challenges in some of our poorest and most deprived communities. Third sector organisations by their nature are closer to the community than government, can be more flexible in their approach and are well placed to advise on the situation "on the ground". It is vital that this
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community voice is embedded at all levels in the proposed new regeneration framework. Ensuring third sector involvement in representation and in governance arrangements and at all levels (national, regional, and local) is key;

- 3.7 WCVA and its members are keen to work with the Welsh Government and members of the National Regeneration Panel and other key strategic partners such as CREW to ensure that the commitment to better governance is realised and in such a way that the third sector is treated as a valued and equal partner, with community voice (and the views of the most disenfranchised groups) amplified at all levels of the proposed new structures and framework;
- 3.8 In our view, greater priority needs to be given in the final document to community empowerment. Community hubs are ideal potential delivery vehicles for the kind of approach to regeneration outlined in the consultation document and benefit from working effectively at regional as well as local levels of delivery. We would like to see the role of the third sector, and specifically the role played by 'community hubs' at the regional and local levels of delivery strengthened and prioritised in the final document.¹⁴ Mainstreaming community hubs in the delivery mechanism, locally and regionally, will ensure that the principles of co-design and co-production are integrated into the overall approach and delivered in practice;
- 3.9 The sector has a number of examples of best practice where community and third sector involvement has been leveraged to maximum effect and at key levels – from the local to the regional and the national. Neath Port Talbot CVS provides an example of partnership working and community engagement which has effectively harnessed local involvement and ensured strategic third sector input at the regional level. NPT CVS has had significant involvement in the Western Valleys Strategic Regeneration Area programme with beneficial impact in terms of outcomes as a consequence;

Neath Port Talbot CVS Case Study

NPT CVS hosted a Third Sector Interface Officer who was seconded to the Western Valleys Strategic Regeneration team with clear strategic aims and objectives.

These included: providing an effective transparent interface between the Western Valleys Programme, CVCs and other third sector organisations throughout the Western Valleys Strategic Regeneration Area; ensuring equal access for all; achieving a strategic & co-ordinated approach to third sector engagement in the Strategic Regeneration Area process; ensuring that each of the valleys within the SRA has been fully engaged in the process and has the ability to discuss, identify and propose solutions for their communities; ensuring a collaborative approach to identifying issues and developing and delivering

sustainable solutions; ensuring that the third sector is kept up to date with the developments in the Strategic Regeneration Area; and finally to show case third sector projects supported by the SRA.

As Neath Port Talbot CVS puts it:

“The post has been instrumental in ensuring a clear link between regeneration within Welsh Government and local communities through the setting up, coordination, planning and administering of 8 cross-county valley area forums comprising key local stakeholders and community members.”

Valley Area Forums

Neath Port Talbot CVS through the Third Sector Interface Officer has also supported the development of Valley Area Forums with their own Terms of Reference and their own Valley Area Plans in which regeneration projects could be prioritised and funding support sought. These forums have ensured a close connection between the third sector and Welsh Government officials with both reporting increased connectivity, and supporting a bottom up approach to regeneration. The fora also bring the added benefit that regeneration is no longer seen as being solely about regeneration of the physical or built environment but about the broader public realm. A recent initial evaluation of the programme has shown key community benefits from a significant number of local community-based projects that have been supported with regeneration monies.

As Neath Port Talbot CVS puts it:

“As the current programme nears its end, it is hoped these area forums will be used as a key planning tool that will maximise the benefits of the new regeneration framework”.

Third Sector Regeneration Forum

The sector has been proactive in seeking to enhance their strategic footprint at the regional level and build greater connectivity between the local and regional levels. For example, Neath Port Talbot CVS recently inaugurated a Third Sector Regeneration Forum, chaired by the Chief Executive of Neath Port Talbot Homes (the largest RSL in the area);

The forum brings together key players in the third sector that have an interest or involvement in regeneration including those who are active within education and lifelong learning and is capable of working at the regional as well as more local levels. The forum aims to feed into other key strategic partnerships locally, regionally and nationally and will, where appropriate, appoint formal third sector representation. The forum will also agree a work plan that will address issues including housing and heritage and the forum will be used as a vehicle for consultation

as well as generating new ideas to work within the new regeneration framework;

- 3.10 We welcome the fact that 'opportunity' for volunteering is noted as something the Third Sector 'brings to the table' in Section 6.1. ii of the consultation document but we recommend that the link between volunteering and regeneration could be highlighted more prominently and as a means of addressing the development of both people and place (or some other kind of community focussed goal such as environmental transformation);
- 3.11 In addition, we wish to emphasise that the potential impact of volunteering in relation to the regeneration agenda extends and reverberates far beyond the third sector with volunteering opportunities extending in sectors as varied as businesses in the community, community justice, schools and hospitals. The potential of volunteering to contribute to the regeneration agenda in this way should be acknowledged in the final document to ensure that volunteering is mainstreamed as part of the new regeneration framework and considered for resources and investment decisions by the new Regional Regeneration Boards;
- 3.12 Finally, WCVA would summarise concerns from the sector as being focussed in three main areas – the potential for duplication by Regional Boards with other structures and networks; the achievement of the whole government approach and the 'fit' or alignment with Communities First, the Tackling Poverty Action Plan and other policies and programmes (including the priority given to Sustainable Development). We go into more detail and include some recommendations in these areas in response to the consultation questions below;

4. Consultation Questions

What is your feedback on lessons learnt from delivery to date ?

- 4.1 The consultation document makes references to the supporting material and reports which informed the regeneration review, including the advice and recommendations from CREW, and the National Regeneration Panel, which WCVA on behalf of the sector endorses;
- 4.2 WCVA is concerned that the consultation document acknowledges this input as part of the review but does not appear to make transparent what key recommendations or learning from the supporting evidence it wishes to prioritise. Nor does the document appear to have embedded or mainstreamed the conclusions and learning from these reports into the main document;
- 4.3 WCVA recommends that the final document makes explicit reference to the learning from the past, and how this learning has been applied to shape the new regeneration framework and to drive more effective delivery moving forward. In addition, we recommend that clear guidance is provided to the new Regional Regeneration Boards on applying the learning, and drawing on models of best practice, and reflecting this in outputs and investment priorities and decisions;

- 4.4 In our view the most effective regeneration projects and activities are those in which the third sector and communities are treated as equal and valued partners and at all levels. One clear implication of the Neath Port Talbot CVS case study outlined above (and that of other regeneration programmes involving the third sector including Communities First)¹⁵ is that effective community and third sector engagement does not happen by default but by design. WCVA recommends that this learning is applied when it comes to the implementation phase of the new regeneration framework to ensure that third sector input and community voice are both firmly embedded especially at the proposed new Regional Regeneration Boards.;
- 4.5 The third sector is actively involved in developing regeneration policy and practice and WCVA welcomes the Welsh Government's acknowledgement of the breadth and depth of the skills and knowledge within the sector in the consultation document. We welcome the fact that the third sector is praised in the consultation document for playing 'a significant role in regeneration' and for developing services for 'those who find it difficult to access mainstream programmes'. We want to ensure that the sector's expertise is harnessed and throughout the review and subsequent programme delivery and development;
- 4.6 Larger third sector regeneration agencies, especially Registered Social Landlords (RSLs), are rightly recognised as increasingly important partners in delivering major projects in local areas. RSLs are not only equipped to deliver capital projects, but can reach marginalised groups through tenant engagement and empowerment. They have a unique relationship with some of our most marginalised communities. We therefore welcome the fact that the Registered Social Landlords (RSL) sector and larger third sector regeneration agencies are acknowledged as increasingly important strategic partners in delivering major projects in local areas and would wish to emphasise the powerful brokerage role they also have working with and meeting the needs of disadvantaged and poor individuals and communities;
- 4.7 The sector has led the way in working across boundaries and providing innovative responses to problems. Increasingly, the third sector offers opportunities for alternative models of enterprise including a variety of different social enterprise models, such as cooperatives, community businesses, and development trusts with many third sector organisations effectively acting as community hubs, and as agents of community led regeneration with an anti-poverty impact;

Should other national outcomes or principles be considered?

- 4.8 The three proposed national outcomes mirror the national outcomes of the Communities First programme (namely prosperous Communities (Economy), learning Communities (Education), healthier Communities (Health). We welcome this and believe that the new regeneration framework will gain traction and be more effectively mainstreamed and aligned with anti-poverty action as a result. We recommend that these
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- three national outcomes are also clearly identified as priorities in the Tackling Poverty Action Plan to be refreshed in June 2013;
- 4.9 WCVA also believes that greater priority should be given to the role of sustainable development in the final document reflecting the priority given to sustainable development as the central organising principle in the Welsh Government's Programme for Government and the priority it has in the context of Europe 2020 goals for smart, sustainable and inclusive growth. We recommend that Sustainable & Resilient Communities (Sustainable Development) be named the fourth Key Outcome. This makes visible and transparent what has already been acknowledged in the document – namely that sustainable development is a key organising principle of Welsh Government activity.¹⁶ Sustainable development needs to be clearly identified as an outcome to ensure that sustainable development is effectively mainstreamed, and not just paid lip service to in the new regeneration framework;
- 4.10 Third sector organisations and networks who have responded and provided input believe that greater emphasis should be placed on environmental enhancement within the regeneration framework such as Green Infrastructure and working with people to connect them to nature. The definition of regeneration outlined in the consultation document in Section 4: Our Vision and Outcomes for Regeneration does not contain the word 'environment'. We recommend that the definition of regeneration should therefore be modified as follows: "an integrated set of activities that seek to reverse economic, social, environmental and physical decline to achieve lasting and sustainable improvement, in areas where market forces will not do this alone without some support from government"
- This section of the consultation goes on to comment:
 "This requires a holistic approach, targeting economic decline, poor health, housing and educational attainment and loss of environmental quality (our emphasis) which have become knotted together in our deprived communities".
 Alongside the reference to environmental quality, we would add "connection to nature";

What more can be done to achieve greater coherence and cross cutting action across departments?

- 4.11 Regeneration cuts across a wide range of policy and programme areas including (but not exclusively): anti poverty, social justice and equality; European Structural Funds and the Rural Development Plan; Communities First; public service delivery; co-design and delivery; procurement; Health; well-being; education and learning; economic development and renewal as well as other government initiatives such as City Regions, Business Rates Review and the like;
- 4.12 WCVA welcomes the whole-Government and cross-sectoral approach outlined in the draft document and the fact that this proposed new regeneration framework has been endorsed by the Cabinet. The challenge will be translating this high level political commitment in

practice and cascading the approach strategically and operationally at all levels (national, regional and local) to ensure that the regeneration impact of mainstream spend, not to mention the approach outlined in the regeneration framework is mainstreamed across other government departments and crucially in our view reverberates beyond government to external stakeholders;

- 4.13 There are positive indications that the whole-Government approach and the culture change implied is being embedded and that national programmes and activities are being designed to reinforce one another to have maximum impact. For example, we welcome the fact that the national outcomes outlined in the document mirror the national outcomes of Communities First. This is one tangible and practical example of the kind of joined up approach to policy and practice that the document actively encourages;
- 4.14 Nevertheless, WCVA 's concerns focus on three main areas – the translation of the whole government approach in practice; the potential for duplication by Regional Boards with other structures and networks; and the 'fit' or alignment with Communities First and other linked policies and programmes (such as Sustainable Development);
- 4.15 There are examples where different Welsh Government policies and approaches are at risk of working against each other or where at best the strategic read across does not appear to have been made. One example is the current review of the proposed Rateable Value limit on premises eligible for charitable relief,¹⁷ a policy recommendation which appears at odds with the encouragement being given to 'meanwhile use' in the Welsh Government's Vibrant and Viable Places consultation which we endorse (alongside the supporting evidence and recommendations made by CREW, the Centre for Regeneration Excellence in Wales);
- 4.16 Concern has also been expressed that sustainable development is about localisation, whereas other Welsh Government initiatives (such as city regions) and the emphasis on new Regional Regeneration Boards would appear to be locating power at a greater spatial level. These potential tensions need to be acknowledged and addressed in the final document so there is greater clarity about where the priority lies;
- 4.17 To facilitate and embed the Cabinet level commitment to the proposed new regeneration framework, we propose that moving forward programmes are assessed and 'regeneration proofed' at the ideas generation stage, and at the strategic and operational level before policy or programme changes are agreed or implemented;
- 4.18 Viable and Vibrant Places makes strong connections to the Welsh Government's Tackling Poverty Action Plan and to aligning regeneration goals with European Programmes 2014-2020. We welcome such an approach. A key task for all stakeholders will be in ensuring that these linkages are strengthened, not just in policy rhetoric but realised in practice – in programmes, budgets and involvement in the proposed Regional Regeneration Boards, alongside local delivery;
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- 4.19 WCVA believes that greater coherence and cross cutting action across departments will be achieved if the national outcomes developed as part of the Welsh Government's tackling poverty action plan mirror and are closely aligned to those identified in the proposed regeneration framework;
- 4.20 We recommend that WG officials working on the new regeneration framework work closely with colleagues responsible for 'refreshing' the Tackling Poverty Action Plan and developing the anti-poverty indicators by which Government programmes will be measured and work closely with the Communities First programme teams as well;
- 4.21 We also recommend that WG officials working on implementing the new regeneration framework liaise closely with colleagues at WEFO to ensure synergy as far as possible, in recognition of the fact that Structural Funds 2014-2020 have the potential to be leveraged for financing anti-poverty and regeneration programmes and activities, and add value to existing government budgets;
- 4.22 WCVA has received strong representation from third sector organisations and networks whose priority is sustainable development. These organisations and networks have been encouraged to provide their own detailed written response. But in summary, the feedback we have received relevant to this question is as follows:
"Maintaining and restoring the natural environment will play a fundamental role in sustaining our collective future. People's connection with nature can increase their health and well-being, one of the range of social, economic and environmental services provided by the natural environment without which society could not function. Planning for new and existing communities provides real opportunities to protect and enhance the intrinsic and practical value of the natural environment while responding to specific challenges posed by climate change. Therefore, the 'Environment' cannot be left to only the Environment and Sustainable Development Department. All departments need to work to achieve a healthy environment for our own wellbeing if nothing else."
- 4.23 In line with our recommendation to include Sustainable and Resilient Communities as the fourth national outcome, it follows that sustainable development and environmental issues must be mainstreamed and embedded cross government departments, programmes and budgets;
- 4.24 Making the connections and at the appropriate level is going to be critical. In our view, greater coherence and cross cutting action will be embedded, and accelerated if national outcomes, and principles mirror key connecting policy and programmes (for example Anti-Poverty, Regeneration, Communities First, Sustainable Development, and also Equalities) and are 'matched' to European Structural Funds priorities 2014-2020 (where possible) to lever in additional funding for delivery partners like the third sector;
- 4.25 Where possible regeneration indicators should also mirror and be aligned to anti-poverty indicators identified as part of the Tackling Poverty Action Plan (and those identified in the Communities First programme). Choosing the appropriate indicators in both cases is

- going to be critical in ensuring that the regeneration and anti-poverty impact of mainstream government spend (in health, education, business and enterprise, and the environment for example) is maximised and leveraged to produce anti-poverty outcomes;
- 4.26 The Welsh Index of Multiple Deprivation and CREW's Regeneration Impact Assessment Toolkit provide good starting points. In addition, there are a range of well developed indicators for measuring indicators of resilience and sustainable development in communities and these also need to be included and applied. We strongly caution against reinventing the wheel when there are perfectly good indicators out there and would argue that what is really needed is departmental collaboration and a consensus cross departments on the essential cross cutting indicators and a change management strategy for delivering this new way of working. Cross referencing and alignment should also be made with the indicators selected under the Communities First programme;
- 4.27 This process of alignment will increase the scope for more joined up approaches, and maximise the investment of regeneration funds. It will create the potential to access mainstream government spend and provide funding from other sources (such as European funds 2014-2020). It should also ensure that the value of the regeneration framework and its approach is effectively embedded cross departments in mainstream programmes, and budgets (including health, business and enterprise, education and the environment/sustainable development) where the transformational impact on communities can and will be felt;
- 4.28 As noted above, the regeneration activities that the Vibrant and Viable Places consultation document is designed to address need to be mainstreamed cross government as a whole and need to be seen beyond areas traditionally given Regeneration Area status. Regeneration activities and any accompanying cash resource must be closely linked to the much larger drivers for regional growth and wealth creation. Where City Region status is likely to be granted, then the small budget available for strategic regeneration areas needs to be segued into the much larger potential budgets which will accompany that initiative and any block grants to the area that might accrue from European Structural Funds 2014-2020;
- 4.29 In our view, this cross government, cross sector approach needs to start within government but reverberate far beyond it – to external stakeholders and partners in delivery and other potential funders (including Europe, trusts, foundations, as well as business). The final document needs therefore to encourage stronger links not just across Welsh Government directorates but also with these key external stakeholders and partners in delivery (including the third sector);
- 4.30 It is equally important that the final document emphasises the need to build relationships with colleagues in economic and social regeneration groupings and networks locally, regionally and nationally to ensure that all key stakeholders including the third sector in all its diversity are engaged to ensure that the sector (along with other stakeholders) can

help shape and redesign the elements that come within the regeneration areas' financial pot and beyond;

- 4.31 The final document would also benefit from referencing and making the link to the very recent (and significant) change in local planning and policy as directed by the Welsh Government | Shared Purpose – Shared Delivery consultation last year, and the development of Single Integrated Plans. There is little reference in the consultation draft as to how the SIPs will influence local regeneration. It would be a missed opportunity if the links and connectivity between the two were not strengthened given that both include the common strand of Communities First outcomes and third sector influence;

Do you agree with the national, regional and local approach being set out?

- 4.32 Vibrant and Viable Places proposes a new governance structure as the framework within which decisions about investment decisions will be made.

- 4.33 WCVA believes that the consultation document, Vibrant and Viable Places, and the specific commitments to 'better governance' within it raises important questions for the Welsh Government as well as the sector. These include:

- Will the sector be on the Regional Boards and how?
- Will there be a transparent bidding system for initiatives to the Boards?
- Will the decision making also be transparent?
- How can the sector facilitate bids to the Regional Boards?
- Is there a place for community hubs in the process/bidding?

- 4.34 The proposed approach to regional and local delivery, which mirrors the regional footprint in the next phase of Communities First and the wider public services collaboration agenda, poses challenges as well as opportunities for the third sector both in how it organises and engages at the regional level and locally. We believe that one of the tasks for the sector as well as the Welsh Government will be in ensuring that linkages with the regeneration goals of Communities First, the Tackling Poverty Action Plan and European Programmes are strengthened in practice as well as in policy rhetoric and that mainstream government programmes give consideration to the 'regeneration (and anti-poverty) impact' of their activities;

- 4.35 The draft consultation document makes reference to the importance of Communities First and third sector influence, but it does not make it clear if it will be acceptable and /or possible in the new regeneration framework and proposed new regional structures for large scale regeneration projects to be developed from the 'ground up' bringing in partners along the way (in a classic co-production model) as opposed to statutory bodies developing large scale projects and then consulting and gaining community approval. In line with our submission on the future shape of Communities First in 2011, WCVA favours the first approach but in any event clarity as to whether and how the sector can facilitate potential bids to the regional boards (or indeed if it can do so) is needed;

- 4.36 Some concern has been expressed that the Regional Regeneration Boards being proposed are being proposed to fit with the broader public services collaboration agenda, and represent a form of local government reorganization through the backdoor. As a consequence there is concern about the risk of duplication (especially when it comes to pre-existing structures and fora) and that the proposed Regional Regeneration Boards are too top heavy and unnecessary when measured against the actual size of the regeneration budget. These concerns resonate with and reflect the views expressed during the Communities First consultation and the practical experience of implementing these changes as part of Communities First reorganization have reinforced the concerns expressed above about over-duplication, bureaucracy and resource implications (in terms of time, and money not going to the front line);
- 4.37 Particular concern has been expressed from South West Wales which is likely to have a significant governance arrangement for the city region and the South West Wales Regional Economic Strategy. There are concerns about duplication, and unnecessary bureaucracy and inefficient use of resources (including time) with concerns expressed that the third sector is already spread thinly or stretched to capacity when it comes to participating in various stakeholder fora;
- 4.38 In our view, it would be helpful at the very least if the final document provides clarity as to whether the proposed Regional Programme Boards must be new entities or whether - if pre-existing regional fora exist - these will be considered fit for purpose.
- 4.39 We have also received representation to the effect that it would be useful if the final document clarified whether the Regional Boards are synonymous with the current Regional Collaboration Boards (RCB) or in some areas joint Local Service Boards (LSBs). CVCs currently play an invaluable role on LSB's or RCB's and help to reinforce the citizen and third sector focus and enhance opportunities through the Welsh Government funded 'Making the Connections' project to develop and apply co-production in local areas, as well as supporting 'hubs' in whatever form they might take. It would be beneficial to see the final document endorse the role of CVCs (or 'networked' CVCs as with the Neath Port Talbot CVS example above) in the proposed governance arrangements for the new regeneration framework;
- 4.40 Positive examples where the third sector has innovated and created networks and fora which connect local and regional partners and stakeholders including CVCs include Neath Port Talbot CVS. Neath Port Talbot CVS has successfully leveraged third sector strategic engagement and delivery with the Strategic Regeneration Area and there are other examples. We believe such approaches need to be built upon if we are to embed success in the new regeneration framework proposed in the consultation document;
- 4.41 As a precautionary note specifically in relation to the timetable for implementation, we have received comments and feedback to the effect that the reformation of the Communities First Programme has been hindered by the shift to new regional structures and the cluster approach and model has taken some time to bed in. The new

Communities First cluster approach, as with all new processes/structures, is taking some time to bed in and further reorganisation or creation of new regional structures or Boards could result in communities not being ready to engage fully with the new regeneration framework as would be desirable and necessary for its long term success;

- 4.42 There are concerns being expressed that the third sector voice is at risk of getting lost in the proposed new regional arrangements, and that connectivity between the local and regional tiers could be lost with citizens and communities becoming distance from the regeneration process and projects. In our experience, it is important that the third sector is effectively linked to local and regional strategic regeneration area groupings so that the benefits of involving the third sector can be articulated and understood by other stakeholders;
- 4.43 As noted earlier (see Section 3), it is vital that third sector involvement in representation and delivery is embedded and made meaningful at all levels of the proposed new governance structure, and as important that the third sector is treated as a valued and equal partner. The views of communities need to be taken into account, and community led regeneration needs to be supported and enabled in the context of the national goals and outcomes and regional and local levels of delivery;
- 4.44 The new governance structure and approach will only succeed if it ensures effective community engagement. Community buy in will be critical in much the same way that the way in which communities look and feel about themselves will be crucial in helping to maintain civic pride. Capturing local involvement in planning for regeneration and aligning this with the anti-poverty agenda could be a good way of helping counteract low esteem and aspiration in some of our most deprived communities and also create legitimacy;
- 4.45 Bottom up and top down approaches to regeneration must effectively meet to ensure that communities do not feel disenfranchised from Government planning during tough economic circumstances and major welfare reform. The third sector already plays a critical role as community broker and intermediary creating the mechanism or space in which top down approaches and bottom up approaches can meet and effectively learn from one another;
- 4.46 WCVA is keen to work with the Welsh Government and members of the National Regeneration Panel and other key strategic partners such as CREW to ensure that the commitment to better governance is realised and in such a way that the third sector is treated as a valued and equal partner with community voice amplified at all levels of the proposed new structures and framework. Recent initiatives such as the formation of the Third Sector Regeneration Forum by Neath Port Talbot CVS chaired by the Chief Executive of Neath Port Talbot Homes (the largest RSL in the area) outlined above shows that the third sector stands ready to organise itself in new ways to ensure that connectivity between local and regional planning is enhanced;
- 4.47 The sector has as already noted led the way in working across boundaries and providing innovative responses to problems. Community hubs are ideal delivery vehicles to embed the kind of

innovative approach that is implied in the consultation document and hubs can work effectively at the regional, as well as local, levels of delivery. Community hubs can also become a focal point for anti-poverty action in local communities and a means of regenerating people and places in sustainable ways. WCVA would like to see community hubs recognised as key delivery partners at the local and regional levels of delivery and the role that they can play in delivering sustainable and community led regeneration activities clearly acknowledged in the final document;

- 4.48 Finally, the consultation document states that sustainable development is a core guiding principle of the new regeneration framework, but concern has been expressed that the sustainable development agenda is closely linked to a localisation agenda. In contrast, the consultation document appears to be prioritising the regional footprint as central to the new regeneration framework. WCVA believes that a stronger commitment to sustainable development, to local community engagement, to the role of the third sector, and the role played by community hubs will go some way to addressing these concerns and striking the right balance between the local, regional and national if they are reinforced in the final document, as will our recommendation to strengthen the focus on sustainable development by including this as one of the national outcomes;

Do you have any comments on our proposals for how we will target and direct our funding?

- 4.49 WCVA recognises that with limited resources, difficult decisions need to be made about where and how to target and direct funding from limited regeneration budgets. We agree that a balance has to be struck between opportunity and need, which also implies striking the balance between action to minimise poverty and maximise growth;
- 4.50 Creating jobs, and growing the economy in smart, sustainable and inclusive ways is key. Investment decisions about how to target and direct funding should be focussed on minimising poverty and maximising opportunity and be decided based on a significant level of community engagement and buy in;
- 4.51 The new Regional Regeneration Boards need to be change agents and advocates for the new regeneration framework, with regeneration budgets at the regional level being used to encourage innovation, alongside the cross fertilisation of new approaches, with the capacity to leverage additional funds alongside mainstream department budgets. WCVA and the sector specifically endorses the detailed recommendations outlined in the CREW report that informed the regeneration review;
- 4.52 The third sector is a key innovator and there is scope for aligning and maximising programmes to ensure additional and match funding from European Structural Funds, and other sources. The investment strategies of the proposed new Regional Regeneration Boards need to be smart, sustainable and inclusive, using the limited regeneration budget as a catalyst or lever to focus mainstream department budgets to have regeneration and anti-poverty impacts or to be used as a

regeneration (or anti-poverty) innovation fund prototyping and testing new approaches which can then subject to proof of concept be rolled out;

- 4.53 We recommend that Regional Regeneration Boards prioritise strategic programmes and partnerships which involve the third sector and engage communities. In this way, regeneration programmes will be smart, sustainable and encourage community resilience;
- 4.54 It is important to recognise that the regeneration activities that the Vibrant and Viable Places consultation is designed to address are a very small part of the regeneration agenda within our South West Wales region (and indeed Wales as a whole). Whilst welcome in areas given Regeneration Area status, or selected as a priority area for investment by the new Regional Regeneration Boards, programme activities and accompanying cash resource must be closely linked to the much larger drivers for regional growth and wealth creation. Where City Region status is likely to be granted then the small budget available from the regeneration funding pot needs to be used to mainstreamed into much larger potential budgets which accompany that initiative and any block grants to the area from Cohesion/post Convergence funding;
- 4.55 Any evidence base (as detailed in section 6.3.i of the consultation document) should include environmental evidence (including local and national areas of importance for nature conservation, priority action for biodiversity (such as Local Biodiversity Action Plans, green infrastructure etc). WCVA welcomes the fact that a place-based approach has been recognised as a successful approach to creating physical and environmental improvements to an area but would recommend that more emphasis and funding should be placed on ecological regeneration, including Green Infrastructure (GI) in the final consultation document with links being made to the anti-poverty impact of this as well;

We want to ensure effective monitoring and evaluation of regeneration activities, will the approach set out achieve this?

- 4.56 WCVA welcomes the commitment to applying Results Based Accountability across all areas as this will endorse 'the story behind the baseline' and 'who are the partners' message, ensuring the local picture is taken in context and that all partners feel equally responsible to engage with others from the outset. As RBA is being applied cross government, it also makes sense for streamlined monitoring and evaluation systems;
- 4.57 Welsh Government officials developing the monitoring and evaluation of regeneration activities should be encouraged to liaise with and 'match' these as far as realistically possible with the approach taken in WEFO for European funded programmes given that European funding is likely to be critical in levering in additional funding and investment for regeneration and anti-poverty activities;

Further comments

See section 3 above.

In addition, we wish to make further detailed comments in relation to the link between the new regeneration framework and volunteering with some suggestions for how these links could be strengthened in the document.

- 4.58 We welcome the fact that ‘opportunity’ for volunteering is noted as something the Third Sector ‘brings to the table’ but we recommend that the link between volunteering and regeneration could be highlighted more prominently and as a means of addressing the development of both people and place (or some other kind of community focussed goal such as environmental transformation);
- 4.59 Volunteering opportunities are varied. Some focus on the development of the volunteer (including skill building, personal development, increasing readiness for work); others focus on harnessing volunteer resource to achieve positive change of some kind, thus adding value to what an organisation can accomplish. Most volunteering is a mix of these two;
- 4.60 Social enterprises that involve volunteers provide good examples of achieving both these goals. For example, a furniture recycling project can be as much about ‘recycling or upcycling people’s skills’ as it is about ‘recycling or upcycling’ furniture. The two goals often go hand in hand. WCVA has already provided examples where the anti-poverty impact of social enterprises and the successful mobilisation of volunteer time through time banking can tackle and mitigate poverty and its effects, thus having a potential regeneration impact;¹⁸
- 4.61 Time banking offers a particular model for increasing the positive engagement of a community, creating an independent ‘can do’ approach to community problems, challenges and engagement. However it requires significant resourcing. It may be (but has yet to be demonstrated) that on withdrawal of the timebanking infrastructure (coordinator and funded programme of rewards) voluntary activity and community engagement continue, with lasting benefits to communities and individuals. This warrants further exploration; and could again be a focus of potential projects and activities for support at the regional level;
- 4.62 Volunteering is not, and should not be seen as a cost free option. The capacity of most charitable organisations or social enterprises to offer well managed volunteering opportunities is dependent upon its ability to invest in appropriate volunteer management. Rarely (except perhaps in the case of some social enterprises) is volunteering self financing. This is an area in which increased funding would be beneficial and we would recommend that supporting structured and well managed volunteering opportunities on a regional level could be a focus of Regional Regeneration Board’s investment;
- 4.63 Finally, it is worth mentioning that the potential impact of volunteering in relation to the regeneration agenda extends and reverberates far beyond the third sector with volunteering opportunities extending in sectors as varied as businesses in the community, community justice, schools and hospitals – not to mention the untapped potential of
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developing further volunteering opportunities for people and places. The reach and the potential of volunteering to contributing to the regeneration agenda in this way should be acknowledged in the final document to ensure that volunteering is mainstreamed as part of the new regeneration framework and considered for resources and investment decisions by the new Regional Regeneration Boards;

5. Conclusion

- 5.1 This is a fast moving policy agenda, as is the timetable for implementation following the end of the consultation period. Investing the time now in modifying and enhancing the new framework will pay dividends in the medium and long term;
- 5.2 WCVA and the sector is keen to seize this important strategic opportunity to engage and respond to the Welsh Government with the explicit aim of enhancing the anti-poverty focus of the new regeneration framework and strengthening its connectedness to anticipated policy consultations and developments underway, with specific reference to the imminent European Structural Funds 2014-2020 consultation, the Sustainable Development Bill and the June 'refresh' of the Tackling Poverty Action Plan;
- 5.2 WCVA and its members are keen to engage further in this review and wish to emphasise the importance of embedding meaningful engagement with the third sector at all appropriate levels moving forward. WCVA would be happy to meet and discuss these or any other relevant issues with appropriate colleagues in Welsh Government and beyond;
- 5.3 Please contact us using the details below if you would like to discuss this response further or offer any further opportunities to engage with this work.

53. Chwarae Teg

Key points

1. Women are central to community led initiatives and yet we know that they are under-represented in decision making. From anecdotal evidence, we would assume that this is the case in the regeneration arena. Chwarae Teg recommends that the Welsh Government sets a quota of 47% for the representation of women on the proposed Ministerial Advisory Group and regional boards in order to reflect the proportion of women in the labour market. Chwarae Teg would be very willing to support the Welsh Government to achieve this.
2. A whole Government approach is also crucial for the success of regeneration policy. Existing Welsh Government policies with an impact on regeneration have clear gender impacts which need to be considered and again we would be happy to assist the Welsh Government in taking this forward.
3. A commitment to collaboration across the public, private and third sectors is crucial for successful regeneration policy and it would be good to see the new structures embedding co-production through multi-sectoral membership, making sure that smaller community organisations with experience of local

regeneration, inform strategic planning at a national level. We would be happy to assist in facilitating the recruitment of appropriate members.

Detailed response

1. What is your feedback on lessons learnt from delivery to date?

1.1 We are pleased that the Welsh Government remains committed to the Equality Impact Assessment process. At a local level, women are significant contributors to regeneration and benefit more than men from the benefits of community programmes. A thorough gender analysis of impacts must be carried out in order to ensure women benefit fully from regeneration at all levels.

1.2 The Welsh Government programmes identified as having implications for regeneration also have clear gender impacts which we have raised in previous consultation exercises. In particular, investment to boost growth and jobs is heavily directed at sectors in which women are underrepresented. This means that women are prevented from contributing to and benefiting from economic growth.

1.3 Chwarae Teg agrees with the limitations set out in the consultation document. In particular, issues of clarity around selection criteria and timing of funding opportunities need to be addressed. This is particularly important to ensure that smaller community organisations with limited resource are able to successfully bid for funding. The Welsh Government might consider providing further support to organisations to ensure they are able to develop successful proposals.

2. Should other national outcomes or principles be considered?

2.1 Chwarae Teg agrees that it is sensible to align national regeneration outcomes with Communities First and Programme for Government objectives. We support the definition of regeneration provided in the consultation document and urge the Welsh Government to recognise the specific gender issues which must be addressed in order to 'reverse economic, social and physical decline'.

2.2 We also agree with a focus on 'vibrant, viable and sustainable communities with a strong local economy'. In order to achieve this, we believe that programmes should support women to engage with the economy to the very best of their ability. There is a wealth of evidence to show that women's skills are under-utilised in the economy. Successful regeneration policy will support women to make full use of their skills to support economic growth.

3. What more can be done to achieve greater coherence and cross-cutting action across departments?

3.1 A commitment to collaboration across the public, private and third sectors is crucial for successful regeneration policy. It is also important that this takes place at all levels, making sure that smaller community organisations with experience of local regeneration, inform strategic planning at a national level.

3.2 A whole Government approach is also crucial for the success of regeneration policy. We have already identified that existing Welsh Government policies with an impact on regeneration have clear gender impacts. For example, there are clear differences in gender impacts within the Wales Infrastructure Investment Plan. For example, investment will be

prioritised in favour of the sectors identified in the Welsh Government's economic renewal strategy. Analysis of these sectors shows that women are under-represented in employment within these industries and so the areas in which they do dominate will not enjoy such benefits.

3.3 A people and places approach must recognise that women are key players in delivering community regeneration and are often the main beneficiaries of local programmes.

4. Do you agree with the national, regional and local approach set out?

4.1 Chwarae Teg agrees that a national, regional and local level approach is required in order to achieve the best results.

4.2 We urge the Welsh Government to ensure that women's voices are heard and used to inform the development and implementation of regeneration programmes.

5. Do you have any comments on our proposals for how we will target or direct our funding?

5.1 Women play an important role in regenerating communities. Anecdotal evidence suggests that they are well represented at a local level but under-represented in strategic planning at a national level.

5.2 Chwarae Teg recommends that the Welsh Government sets a quota for the representation of women on the proposed Ministerial Advisory Group and Regional boards. We suggest that such a quota be set at 47% in order to reflect the proportion of women in the labour market. Chwarae Teg would be keen to support the Welsh Government to achieve this.

5.3 Chwarae Teg believes that equality impacts should be assessed in the application process to ensure that programmes consider the specific needs of women and other protected groups.

6. We want to ensure effective monitoring and evaluation of regeneration activities; will the approach set out achieve this? Particular focus on economic impact and jobs

6.1 Chwarae Teg supports the proposed approach of results based accountability. We believe that it is important to measure gender impacts and recommend that the Welsh Government ensures outcomes for women and men are considered in the evaluation process.

Conclusion

1. Women are key players in developing and delivering regeneration programmes at a local level. As such, they should be included in decision making at all levels. Chwarae Teg recommends that the Welsh Government sets a quota of 47% for the representation of women on a Ministerial Advisory Group and regional boards.

2. A whole Government approach is required to successfully deliver regeneration priorities. Policies which impact on regeneration have clear gender impacts and it is crucial that these are considered in future planning.

3. Collaboration between the public, private and third sectors is also crucial. This must take place at all levels, making sure that experiences at grassroots level inform strategic planning nationally.

Chwarae Teg would be happy to assist the Welsh Government in taking the actions identified in this response.

54. Keep Wales Tidy

Keep Wales Tidy's response to:

Welsh Government's Consultation Document – Vibrant & Viable Places
New Regeneration Framework

Keep Wales Tidy's mission is to encourage local action to protect and enhance our environment, contributing towards a sustainable future. We are an independent national voluntary organisation with charity status and support communities, groups, schools and individuals throughout Wales. We deliver:

- Programmes which improve the quality and sustainability of the environment;
- Advice and technical expertise to Government and partners;
- A means of translating strategic policy into effective local action;
- Campaigns on a range of environmental issues.

We operate at international, national, regional and local levels. We aim to influence behaviour change through policy development and campaigns, environmental education and community engagement.

Keep Wales Tidy (KWT) reaches in to the heart of communities throughout Wales. We deliver programmes which are specifically tailored to support the people of Wales and improve the quality and sustainability of the environment in which we live and work. The local environment is central to our wellbeing and has implications for everything from our health, through to our economy and our cultural values.

Keep Wales Tidy welcomes the opportunity to comment on this consultation document. Below are our responses to the questions in the document, which we feel are appropriate to our organisation's area of work and expertise.

What is your feedback on lessons learnt from delivery to date?

We have outlined below our feedback with regard to the most relevant headings in the document, with respect to our work.

Communities First

The inclusion of environment as one of the six themes in the initial Communities First Vision Framework, (which is no longer the case in the current programme), enabled Third Sector organisations, such as Keep Wales Tidy to be involved in creating better quality local environments, and to provide residents with the opportunity to learn new skills, which would help with poverty issues by e.g. enabling them to learn to grow their own food or enhance job opportunities. Indeed it was an important way of tackling environmental inequality in local areas and the effects this has on communities.

The work undertaken by Keep Wales Tidy in Communities First areas also contributes towards the aims of community engagement and empowerment. For example, involving volunteers in environmental improvement projects provides opportunities to engage with the community in an informal way, and

reaches the harder to reach in society. It also offers alternative ways to tackle the issues arising from our current economic climate.

In particular we would be happy to share the experience and information we gained from the work we undertook under the Outcomes Fund, which include intensive work in 7 Community First Areas. There is an external evaluation of the project, which could be made available if required.

Structural Funds

The contribution that community-based environmental projects can make to regeneration and sustainable communities has also been exemplified through programmes supported through EU Structural Funds.

Sustainable and Resilient Communities

An example of partnership funding working to create sustainable and resilient communities was Cleaner Greener Communities – a successful 3rd sector partnership project funded by the Heads of the Valleys Programme. The main aim of the project was to improve the quality of life within the area through empowering communities to take responsibility for their local environment. The case study below provides an example of the positive sustainable development outcomes of the project.

Tarraggan Group

- The Taraggan group took a derelict area and transformed it into a community allotment and educational garden.
- Cleaner Greener Communities was the first organisation to provide the project with any funding.
- It created a viable community allotment and gardens for the children, people with physical and learning disabilities and elderly people living in the Greater Bargoed area.
- Plot holders were encouraged to grow organic food to promote healthy bodies and healthy lifestyles.

Sustainable Development Achievements from the project were:

- Self Sufficiency - further funding to build an outdoor classroom, an office and fund the salary for an allotment supervisor.
- Physical Regeneration
- Health benefits
- Social inclusion
- Healthy Living
- Skill sharing and development
- 100% take up of plots plus waiting list

Rural Development Plan

With regard to the Rural Development Plan (RDP) we would encourage Welsh Government to consider how RDP and EU funding could be used to make positive changes and implement requirements under the Water Framework Directive, which could have positive benefits for rivers in rural communities. More detailed information about how links could be made with EU funding can be found in the following report: - Allen B, Keenleyside C and Menadue H (2012) Fit for the environment: principles and environmental priorities for the 2014-2020 Rural Development Programmes. Report produced for the RSPB. Institute for European Environmental Policy, London. August 2012.

Housing Led Regeneration

Again with housing led regeneration improvements to the external environment can play an important part in contributing to improvements in housing areas and the well being of individuals, as is demonstrated by the work undertaken by Keep Wales Tidy's Towns Officers and others.

Approach to date

Keep Wales Tidy recognise and agree that working across government and beyond to combine regeneration funding (and other resources) with other investment streams is essential to deliver maximum impact and the other points endorsed through the evaluation as outlined on page 8.

We would also agree with the limitations outlined on page 9b, particularly those relating to:

- broad objectives, but would add the requirement that there is a need for clear outcomes
- lack of clarity about the selection criteria for regeneration areas;
- rigid boundaries which sometimes do not reflect the economic geographies of places and regions;
- the need for funding to not be limited / restricted by annualised funding targets;
- timing of funding allocations does not always match opportunities/capacity to deliver.

Should other national outcomes or principles be considered?

Keep Wales Tidy support the outcomes outlined, but would suggest that consideration should be given to the following additions under each of the overarching outcomes:

Prosperous Communities

1. Economic activities should also reference green jobs and volunteering. To support this request we have taken the following data from the Manifesto we produced in 2010 – “through our community programmes over the last two years, we have worked with 900 volunteer groups and over 22,000 volunteers. We have supported 273,944 volunteer hours. If each volunteer hour were valued at the minimum wage, Keep Wales Tidy has generated nearly £1.6 million of volunteer input to the economy.”

2. The need to maintain “Environmental Capital “, not just to establish energy and food production, but in accord with Welsh Government’s Living Wales and Sustainable Development programmes. This is referenced in the Ministerial introduction “The natural environment is not only a provider of our life support system but also is the bringer of a sense of place, feelings of wellbeing, of better health, more social cohesion, increased job opportunities and long-term success” , but isn’t as well defined in the outcomes.

Learning Communities

Again environmental capital should be included with social and cultural capital.

Healthier communities

The design of buildings and spaces, as well as planning should be included in the last point under healthier communities, as the design can contribute to the use and misuse of buildings and spaces, and to the best use of resources both economic and material.

In 2009 Keep Wales Tidy produced a Good Practice Guide –Designing for a Clean, Safe and Tidy Environment, because the guidance available on urban and street design had limited information on the aftercare of streets and on how to ensure the original quality of the design is retained. The document outlined recommendations and a set a general principles, intended to aid design professionals. The report can be downloaded from our website-<http://www.keepwalestidy.org/policy-and-research>.

What more can be done to achieve greater coherence and cross cutting action across departments?

Keep Wales Tidy is pleased to see that the support for governance arrangements involves the equal involvement of all three sectors in the development of planning and delivery mechanisms, but we would suggest that this needs to be enshrined in the approach and work undertaken by all departments.

We would also like to suggest that the Third Sector can provide other services in addition to those identified, such as data and systems for monitoring change. For example our own Local Environmental Audit and Management System (LEAMS) surveys monitor change in local environmental quality. Such data collection makes an important contribution to monitoring the achievement of outcomes, as outlined in the previous section and could be useful with regard to the collection of information on Welsh places as outlined on page 26.

We are pleased to see the recognition given to the importance of the environment on page 20, but would like to see a reference to maintaining environmental capital, as well as using its resources. (Please see comments above with regard to Outcomes).

It was also pleasing to see the recognition given to the success of Tidy Towns and as stated elsewhere in this response we are happy to share good practice from the project as well as from our coastal, rivers and Eco-Schools work.

Do you agree with the national, regional and local approach set out?

We agree that the delivery of regeneration initiatives is fundamentally a local issue and that all sectors and the community have a part to play. Again, however, it is important to recognise that the Third Sector also collects data and intelligence about local areas and communities independently from local authorities, and that this isn't always included in Single Integrated Plans or Local Development Plans. The Sector also contributes to the delivery of regeneration at the local level. We would suggest that the difference the proposed Sustainable Development Act could have to the delivery for local authorities, health boards and Welsh Government departments, should be acknowledged with regard to the work to be undertaken at all levels. In this context it is interesting to note that Living Wales and other strategic environmental documents, such as those relating to waste and climate change, are not mentioned in the national strategic government policies listed on page 26. Would these be considered in the development of a formal Regeneration Appraisal process?

With regard to the Regional basis we can understand the reason for this approach, but would like to see more clarity in future documents about how the relationship will work between the different levels, and what guidelines there will be for regeneration officials in undertaking the role of working with other Welsh Government officials and partner organisations to develop a clear role to facilitate holistic approaches in key settlements within their remit. Again we would be happy to discuss how we could contribute to the sharing of good/best practice and the collection of relevant research and data, including our work on Eco Schools which can contribute to intergenerational learning about environmental issues in the community.

Do you have any comments on our proposals for how we will target and direct our funding?

We agree that regeneration is not just a physical capital, but is about bringing people and communities out of decline i.e. the people and places based approach. We would, however, suggest that working as a volunteer in the local environment can have the same benefits as sporting and cultural activities. These would include creating networks, learning and development opportunities, transferable skills and improved physical and mental health. Indeed, volunteering activities can often provide the first step in giving people confidence to try other activities. We have stories from individuals involved in Tidy Towns and other projects, which demonstrate this increased confidence. These also show how physical improvements link to social improvement. Our Street Scene Quality Indicator (SQI) could also provide a good way of measuring the performance of places in terms of local environmental quality, as it is based on research about what the public perceive as important for the quality of the local area. We have used this tool to undertake surveys for several RSLs and Swansea Business Improvement District.

A simplified version of the survey tool has also been developed for use by residents/ community groups. It is hoped that this will compliment the walkabouts and other surveys undertaken by residents and others by creating something that would enable participants to consistently measure the same issues on each street. It could also be used to compliment tools such as "Place Check" mentioned on page 30.

Please see note from the Association of Town Centre Managers about the need for tools that can create objective assessment.

Communities and their residents often have difficulty in developing an objective assessment of their strengths, limitations and opportunities, due to over familiarisation, fear of offending someone and the diversity of local perspectives.

Association of Town Centre Managers First Impressions Exercise

This work could also contribute to point 6 on page – 32 - the physical attractiveness of the urban environment being a critical component of the visitor experience and streetscapes can significantly influence visitor impressions. We would also point to the findings in Perceptions of crime, engagement with the police, authorities dealing with antisocial behaviour and Community Payback: Findings from the 2010/11 British Crime Survey (Moon et al.: 2011)..... “that perceptions of crime levels are strongly related to environmental conditions in the local area.”

We want to ensure effective monitoring and evaluation of regeneration activities, will the approach set out achieve this?

Results Based Accounting should achieve what is required if as is outlined in the document evaluation is included from the project inception and the necessary baseline data is collected.

Again in this respect we would be happy to discuss the tools we have for the collection of baseline data.

55. Planed

Vibrant and Viable Places consultation

PLANED Response 2013

What is your feedback on lessons learned from delivery to date?

- It is unclear as to whether transnational approaches have been considered. The evidence collated by the Regeneration Panel from Miller, Wavehill and CREW currently only looks to learn from approaches within the UK.
- Evaluations should be realistically and proportionately funded and we should be able to show how they are used as key learning tools to influence future programmes.
- There is currently a lack of strategic approach across Wales. This has resulted in missed opportunities and a multitude of investment/funding models and criteria. The outcome has been a failure to realise additionality - the added value that can be realised by using the positives of all sectors access to a range of funds.
- A long term strategy is required that outlasts political timescales, and provides sufficient budget – given time and space for innovation, risk and creativity.

Should other national outcomes or principles be considered?

- Regeneration is not only about physical space (built or natural) and the economy but critically about people and services. People need to buy in to

what is going on around them. How this will happen is not clear from the document. Communities need to be engaged from the earliest point otherwise outcomes won't be sustainable. Regeneration should not be seen only as linked to skills and capacity within families and individual of such communities, but based on them. This requires investment and use of tools that are not mentioned in the document.

- Community led local development – people planning solutions for themselves. Bottom up approach is not only needed for 'meeting and working with the clear strategic overview'. The bottom up should assist in informing the strategic overview. There should not just be a 'benefit' to communities – they should influence the solutions.
- Need to consider the 'bespoke programmes' that exist to address the needs of rural and semi-rural areas, to ensure that they are successful in achieving their outcomes for communities, before integrating them.
- Town centres and seaside towns are noted as 'outcomes', however, there is no reference as to why these are chosen and whether other areas are 'written out' of this approach.
- Sustainability as an outcome should underpin regeneration, as opposed to being seen as being purely 'environmental', or a 'strand'.

What more can be done to achieve greater coherence and cross cutting action across departments?

- National strategic objectives which 'stack up' across departments. If they are not identical, as they are trying to achieve different sub-objectives, they should be complimentary. E.g. not all funds/investment/departmental strategy would want to do the same as Communities First because of its specific geography. Whilst not all investment should be solely directed to these areas, the CF programme needs to be recognised as it contributes to the major strategic objectives. Analysis beyond the existing CREW work is required as a meta-study so that Wales can be seen as a whole geography and 1) need assessed; 2) provision mapped; and 3) gaps analysed – to show exactly how value can be added.
- One plan needs to be known about and committed to across departments, but also beyond Welsh Government to DWP, UK Government departments (Big Society agenda) and other funders such as Big Lottery.
- The cross-cutting agenda needs to reach further. The third sector should not be seen as one that offers an 'alternative' approach but one that can enhance creativity, value for money, sourcing funding and sustainability. True partnership will require a levelling of the playing field between all sectors so that the best value can be gained from all for overall better outcomes.

Do you agree with the national, regional and local approach set out?

- The document makes little reference to how the local will link through to the national approach, and the significant role for communities is not clearly outlined. What does the genuine involvement of communities 'look like'? The third sector should necessarily 'advise as to the situation on the ground' but assist with generating bottom-up solutions which are used to seriously inform the strategic direction.

- The document also notes that sustainable regeneration can only be delivered through genuine engagement with communities and other organisations. However, we need to take a step back, the solutions and ways of delivery should be determined by communities. There are numerous examples where solutions have been far more successful because of community involvement at the earliest stage. These have been proven using tried and tested methods developed by organisations such as PLANED. This will also enhance the sense of place, identity, neighbourliness and cultural recognition of local heritage. By doing this, local economies can be supported by educating people to 'buy local' and by developing local people to take pride in their surroundings and become 'welcome hosts' for tourism.
- The role of the public sector, particularly local authorities, should be recognised and valued as different but complementary to that of the third or community sector. The Simpson Report referred to joint delivery between the sectors in order to secure area regeneration. Local authorities and other public sector organisations have a political mandate that directs their work, and can bring a great deal of strategic 'glue' by linking to wider regional economies. However, where community engagement can enhance regeneration processes, the third sector has the skills and participatory mandate which enables community led local development to create buy in from communities and a more sustainable approach.
- Communities First Partnerships are referenced frequently in the document. Other structures exist which are fundamental to the process, such as Local Action Groups that have been working in and have the trust of communities outside the 10% most deprived clusters.
- Regional geographies can be unwieldy in their approach and may use up valuable resources which could otherwise be invested at ground level. It is also difficult to make them meaningful across a wide geography which includes diverse areas.
- The range of spatial boundaries proposed by different Welsh Government departments further complicates the picture as to which geography applies to which policy area.

Do you have any comments on our proposals for how we will target and direct our funding?

- How finite resources are allocated, and how need and opportunity are defined – need a national approach. Is there a particular criteria by which decisions will be made – 'opportunity' needs to ensure that there is an equal chance for all areas to be selected.
- How will this sit alongside new European funds? Who is building the full picture? Where is the complementarity?
- Many areas are noted as part of the review but a main omission is of rural Wales – what is being done to address access (as noted in WIMD) and other notions of rural poverty.
- Favouring the location of proposals in terms of proximity to CF areas will limit the scope and support for communities that might be isolated and could be linked for example by the development corridors. A significant section of Wales is excluded by this criterion.

We want to ensure effective monitoring and evaluation of regeneration activities, will the approach set out achieve this?

- Evaluation is wasted if it does not inform further learning. There needs to be a fully reflective approach from the evaluation; for all partners at all levels. The most useful monitoring and evaluation exercise should be continuous from the beginning and throughout the life of the framework. It is well-recognised by GSR that an action research process involving policy officials during strategy development and delivery provides the best form of learning and consequently the best form of policy adaptation and amendment throughout its life.
- Results Based Accountability – caution is required with this methodology as this can sometimes distract from the actual change that is needed, and overlook key community engagement. It can give a false sense of achievement. For example, physical and environmental improvements should not be measured as ‘regeneration’. How is the engagement of people included in RBA? What does successful regeneration ‘look like’? The ingredients required will be very different within regional areas and a ‘one size fits all approach’ will not work. For instance, the reference to the ‘food town’ of Ludlow: this was initiated by local people, and not from a government top-down strategy. To understand this, regional teams reading the proposals, will need more development support in order to comprehensively understand and ‘judge’ bids. This would be further complicated by trying to triangulate two different methodologies. Treasury Green Book uses a very different approach to that of Results Based Accountability.

56. Building and Social Housing Federation

Vibrant & Viable Places: New Regeneration Framework – Response from the Building and Social Housing Foundation (BSHF)

Executive summary

BSHF welcomes the opportunity to respond to the Welsh government’s proposed New Regeneration Framework and agrees with the aim that “everybody in Wales should live in a vibrant, viable and sustainable community with a strong local economy”.¹⁹

- Regeneration is a complex issue requiring in-depth and sustained input and action across parties and government departments.
- A detailed identification and consultation with all relevant stakeholders and communities must form the basis of any sustainable regeneration project.
- Reference to the Wales Housing strategy Improving Lives and Communities: Homes in Wales would underline the vital role of good quality housing in regeneration programmes.²⁰
- A close consideration of the contribution that empty properties could make to regeneration is urgently needed.

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- Self-help housing offers a specific example of the benefits of community-based responses to housing need.
- A range of property tenures should be made available in order to respond to the changing demographics within Wales and the needs of specific communities.
- The continuous assessment and evaluation of regeneration schemes should be a participative and independent process.

About BSHF

The Building and Social Housing Foundation (BSHF) is an independent housing research charity committed to ensuring that everyone has access to decent and affordable housing. It holds Special Consultative Status with the United Nations Economic and Social Council. Since 1994 BSHF has organised an annual series of Consultations at St George's House, Windsor Castle, on a range of housing issues, bringing together diverse groups of experts for in-depth discussion and consideration of an important housing issue. Recent Consultations include:

2009: The Future of Housing: Rethinking the UK housing system for the twenty-first century.²¹

2010: Support with Housing Costs: Developing a simplified and sustainable system.²²

2011: More Homes and Better Places: Solutions to address the scale of housing need.²³

2012: Building New Homes for Rent: Creating a Tipping Point.²⁴

This submission is based on these Consultations and other original research undertaken by BSHF. For contact details please see the covering letter or visit the BSHF website (www.bshf.org).

In particular this response draws on BSHF-supported research conducted by Dr Andrea Armstrong of Durham University on the Housing Market Pathfinder programme with particular reference to the 'Bridging NewcastleGateshead' programme.²⁵ BSHF's briefing paper on this research is submitted alongside this response.

Each question posed by the policy team is addressed in turn.

1. What is your feedback on lessons learnt from delivery to date?

1.1. BSHF has no particular comment regarding specific projects. It should, however, be noted that regeneration programmes have been conducted for decades, often with many different programmes being undertaken in the same areas. These programmes have shown significant examples of both success and failure. It is important that a new approach to regeneration builds on a clear understanding of both the successes and failures.

1.2. Many communities have experienced multiple waves of regeneration with residents adversely affected by demolition and relocation programmes. These communities may be unwilling to engage with another programme of

regeneration to their local area. This presents an opportunity to learn from these experiences, but also challenges, due to 'regeneration fatigue'.²⁶

2. Should other national outcomes or principles be considered?

2.1. The Welsh Government defines regeneration as:

“[A]n integrated set of activities that seek to reverse economic, social and physical decline to achieve lasting improvement, in areas where market forces will not do this alone without some support from government”

2.2. This is a broad definition allowing for the inclusion of a variety of stakeholders and discussion around a number of different issues. The emphasis on a holistic approach incorporating, “economic decline, poor health, housing and educational achievement and loss of environmental quality” is welcome in addressing the multi-faceted issues facing deprived communities.

2.3. BSHF believes that everybody has the right to access decent, affordable and secure housing and we support the Welsh Government in naming this as a key factor in the development of vibrant communities.

2.4. It is, however, also important that the government recognises that regeneration needs and desired outcomes will vary for each community and area involved. It is essential to clarify the aims of specific regeneration schemes at the outset of each project. A clear definition of the existing and future 'communities' being targeted by regeneration will also be essential if support is to be appropriately tailored and benefits accurately measured.

2.5. Outcome Three: Healthier Communities, also underlines the Welsh Government's commitment to “good housing, which is affordable and provides tenure choice”. Housing affordability and the provision of a range of tenures are crucial elements of a sustainable community and whilst it is positive that they are addressed in the outcomes it would be beneficial if both aspects were developed further.

2.6. The definition of “affordable” housing would benefit from clarification. It is vital that policy-makers consider the circumstances of members of the targeted communities and ensure that realistic housing options are provided.

2.7. Whilst choice in tenure is not in itself a bad thing, the reference in the outcomes to tenure could be improved by focusing on the suitability of the tenures available rather than the choice per se. This could reflect the language in the National Housing Strategy of the Welsh Government, which talks of broadening the range of homes and tenures available to “suit people's income and circumstances” and cater for changing demographics.

2.8. In addition, the housing strategy highlights the need for action to bring empty properties back into use.²⁰ Empty properties can have a harmful impact on local communities both as a wasted use of housing stock or commercial space, and negatively impacting communities through disrepair and by attracting anti-social behaviour.²⁷

2.9. Empty properties are an important asset that could be used more effectively for the benefit of people in housing need, property owners and local

communities.²⁷ In Wales, there are approximately 23,000 long-term empty properties.²⁸ When a property that has been empty for a long time is brought back into use it increases the stock of available housing just as effectively as a new build home.

2.10. There are also environmental benefits related to bringing empty properties back into use: research commissioned by BSHF suggests that reusing empty homes could make an initial saving of 35 tonnes of carbon dioxide (CO₂) per property by removing the need for the energy locked into new build materials and construction.²⁹

2.11. It is therefore important to consider the contribution that empty properties can make in the context of regeneration, but also remain realistic. Empty homes are often owned privately and may be vacant for a number of different reasons, particularly in areas ear-marked for programmes of investment.²³ Encouraging 'meanwhile uses', as identified in the strategy, appears to offer a valuable short-term, and possibly long-term, response to this issue.

2.12. It is recognised that empty homes, brought back into use, contribute to a built environment that meets the nation's needs rather than blights its neighbourhoods. BSHF proposes that the Welsh Government highlight the need to bring empty properties back into use under Outcome One: Prosperous Communities. This is due to the damaging effects they have on the commercial life of towns and villages.

3. What more can be done to achieve greater coherence and cross cutting action across departments?

3.1. BSHF welcomes the efforts of the Welsh Government to work holistically, across Government portfolios, including, if feasible, the development of a multi-fund approach to the financing of regeneration. A "whole government approach" is certainly crucial to tackling such a range of social and economic issues. Likewise a partnership between the private, public and third sector will be vital in harnessing expertise, delivery mechanisms and community buy-in.

3.2. The National Housing Strategy of the Welsh Government launched in April 2010 contains specific recommendations relating to housing need in Wales. This document notes that investing in housing, both new and old stock, provides a range of benefits including "support for local businesses, job creation and training opportunities", all key elements in a successful regeneration project.²⁰

3.3. The Housing strategy highlights the contribution of good quality housing to regeneration activities and, as such, should be referred to in the Regeneration document. The shared portfolio for housing, regeneration and heritage should foster coherence and cooperation in these areas.

4. Do you agree with the national, regional and local approach set out?

4.1. The complexities of any programme of regeneration call for the integration of policies at each of level of government. BSHF agrees that "the delivery of regeneration initiatives is fundamentally a local issue" and must be

supported by information gathered at this level. There is often “a marked difference between the problems described by local communities and those described by politicians, policy makers and regeneration practitioners”.²⁶

4.2. Residents’ perspectives on regeneration have not always been taken into account. The tangible desires of communities, such as improved transport or banking facilities, can be overlooked at later stages resulting in a top-down approach.²⁶

4.3. An approach which engages with the community, if successful, could overcome the weakness of some previous regeneration programmes that have failed to adequately respond to the views of existing communities. However, there will be major challenges in delivering this aspiration.

4.4. It has yet to be explained what will happen if the priorities of the local community conflict with those of national politicians and policymakers. Without a clear, shared understanding of the problems and challenges facing regeneration areas it will be almost impossible to begin to address them.

5. Do you have any comments on our proposals for how we will target and direct our funding?

5.1. One of the key issues for any funding for regeneration is providing long-term stability. Critiques of regeneration have highlighted the issue of short term funding for long-term regeneration yet the lessons have often been ignored. Uncertainty is one of the main concerns expressed by residents experiencing the regeneration process. There can also be pressure to show progress within electoral cycles which can be difficult for long-term programmes. Therefore, gaining some level of cross-party consensus on regeneration, particularly its funding, would create major long-term benefits.²⁶

5.2. BSHF supports the evidence-based approach to assessing existing regional and local resources. A review of the history of regeneration in Wales, along with the rest of the UK, is also crucial in the development of new, targeted interventions. Learning from both positive and negative experiences from the communities directly involved will help the Welsh government plan further programmes.²⁶

5.3. Government should ensure that legislative and funding frameworks actively promote the involvement of local community groups.

5.4. The experience of self-help housing provides a specific example of the difficulties that local community programmes have in accessing government funding.³⁰ More details on self-help housing can be found in the final section.

5.5. Government should review procurement procedures for contracts so that they do not disadvantage small organisations wanting to bid for construction work. For example, they should ensure that wider community benefits are included in considerations of value for money and that the procurement and monitoring processes are proportionate to the size of the contract.

6. We want to ensure effective monitoring and evaluation of regeneration activities; will the approach set out achieve this?

6.1. BSHF has no particular comment regarding the Results Based Accountability model operated by the Welsh Government. However regular monitoring and evaluation of regeneration projects, against pre-defined targets, is vital. This needs to be supported by the collection of robust qualitative and quantitative data.

6.2. Appropriate levels of funding and training need to be allocated for monitoring and evaluation from planning to delivery. The collection of this data needs to be a priority from the highest levels of management.

6.3. As noted previously, however (paragraph 2.4), the aims and outcomes for individual regeneration projects, along with the identification of all future and existing targeted communities, will require clear definition. A recent review found that “it is important to set realistic targets for regeneration schemes.”³¹

6.4. With a clearer definition, it will be possible to assess the extent to which the local ‘community’ benefits from regeneration programmes. This can be determined by the level of responsibility and resources received by different stakeholders such as residents, community leaders, local government and the voluntary sector.

6.5. The assessment of success should be an on-going, participative process that seeks the views of a wide range of stakeholders. Communities are always changing and are never ‘completed’ so it is important that different views are recorded throughout the regeneration process. It should seek to build on the lessons that can be drawn from previous regeneration projects.

6.6. Assessment of success should also be seen to be credible. In order for this to happen it will need to identify both the successes and failures of this approach. Independent monitoring should be incorporated in the assessment process from the beginning to enhance credibility.

Please feel free to address other issues and queries as part of your response.

The background to the regeneration environment is complex. Barriers include historic issues, employment challenges and financial constraints in the public sector. Some of the key lessons from BSHF-supported research into the ‘Bridging NewcastleGateshead’ programme are that:

- It is important that regeneration builds on a clear understanding of both the successes and failures of previous programmes.
- Analysis of previous regeneration projects has repeatedly highlighted the problem of trying to use short-term funding for long-term regeneration, but the lessons have been ignored.
- Building a sustainable funding package from different funding sources will be a significant challenge, particularly for large-scale programmes. It may test the skills and capacity that are available in local authorities and others stakeholders when they are already under pressure from funding constraints.
- The communities being supported by regeneration are often poorly defined, making it difficult to effectively target interventions and monitor performance.

- Gaining some level of cross-party consensus on regeneration, particularly its funding, would create major long-term benefits through greater stability.^{26,32}

The research shows that one of the key elements in the planning and execution of a regeneration scheme is the identification of the community, or communities, being targeted, including all existing communities. For example, Bridging NewcastleGateshead was criticised for putting the needs of ‘future communities’ above ‘existing communities’.²⁵ It is also important to note that communities are dynamic and “the needs and aspirations of communities can change profoundly and sometimes rapidly”. The need to keep channels of communication open throughout the stages of consultation, planning and delivery is vital. In addition it is important to be able to balance competing interests, taking into account the priorities of local communities even if these should conflict with the aims of policy-makers. “Without a clear, shared understanding of the problems and challenges facing regeneration areas, it will be almost impossible to begin to address them.”²⁶

Despite aspirations for holistic regeneration, previous programmes have tended to emphasise one aspect. For example, Housing Market Renewal focused on physical changes to the environment such as demolition, mixed development and new building.²⁶ There was little emphasis on sustainable development, community participation or employment beyond acknowledging that housing market failure may not derive from houses but may derive from non-housing factors.

Clearly, programmes of regeneration are context-specific and certain approaches or practices may work in some communities but not others. It is important to consider “multiple approaches to regeneration”²⁶ and remain flexible as to the best options in each case. The proposed combination of people- and place-based approaches by the Welsh Government appears to recognise this need.

Regarding housing tenure BSHF has previously encouraged flexibility in tenure choice in response to the Welsh Government’s White Paper on Housing:

“[D]ifferent tenures can benefit different households at different times: in broad terms, the private rented sector provides more flexibility for occupants and is generally quite accessible, whilst access to social renting and owner occupation is more constrained but tends to provide occupants with more security. It is important to note that the growth of the private rented sector in recent years has changed the tenure structure of the housing system in Wales.”³²

Tenure trends in the UK continue to change as owner occupation rates decline (both in relative and actual terms) and the Private Rented Sector (PRS) grows steadily, for a range of different types of household.³³ However, the growth of the PRS has been primarily driven by constrained access to the other two tenures, rather than the desirability of the tenure. Therefore, a substantial proportion of those living in the PRS will not be doing so entirely through choice. There are issues of poor quality in some parts of the PRS and the low security of tenure presents problems for many households.

Consequently, there is a need to consider how best the rented sector can accommodate those who would prefer an alternative tenure.³⁴

Finally, BSHF would like to draw attention to the model of self-help housing in tackling the issue of empty properties. Self-help housing offers a specific example of re-using these properties in a way that also incorporates the benefits of community-based responses to housing need:

“Self-help housing involves groups of local people bringing back into use empty properties that are in limbo, awaiting decisions about their future use, or their redevelopment. It differs from self-build housing which involves constructing permanent homes from scratch.”³⁵

This model of community empowerment and communities working together is applicable to both Outcome Three and Outcome Two: Learning Communities. Fresh Horizons,³⁶ for example, is a community social enterprise based in Huddersfield that has successfully adopted a self-help housing approach. It became involved in self-help housing in response to local problems with abandoned buildings and dereliction. Local private sector empty properties have been targeted and seven options developed to encourage owners to bring empty properties back into use. This generates work for the construction employment and training team and also provides additional housing opportunities for the local community. Tenants have expressed their appreciation in having responsive, local support from Fresh Horizons. While initial empty homes activity has been on a small scale, the aim is to undertake ‘street level regeneration’ based on local clusters of around 30 properties. Analysis of self-help housing by the Third Sector Research Centre³⁷ suggests that it provides:

- An additional source of affordable and accessible housing to meet local housing needs;
- Opportunities to gain construction skills and training;
- A catalyst to combat social exclusion people and to bring the wider community together in order to work on specific local issues;
- An opportunity for owners of empty properties to bring them back into use;
- A significant contribution to wider neighbourhood regeneration.

Taken together, the potential of self-help housing to deliver social and economic benefits is vitally important. Self-help housing can provide ‘win-win’ situations for a variety of different groups. For these reasons, BSHF recommends that the Welsh government investigate further the role that self-help housing can play within the regeneration strategy.

57. Newydd Housing Association

I am pleased to respond to the consultation on the Welsh Government’s framework for regeneration as set out in the document Vibrant and Viable

Places. This response is being submitted on behalf of The Cadarn Housing Group and Newydd Housing Association but has also been prepared with the benefit of my experience as a member of the Barry Regeneration Board and the Vale of Glamorgan Regeneration Partnership.

1. What is your feedback on lessons learnt from delivery to date?

The experience in Barry has been that regeneration is most effective when it is carried out as part of a joined up approach involving intervention by the public and private sector. In Barry outcomes have been maximised due to linkages being made with the Communities First programmes and private investment in areas such as the Barry Waterfront (a hotel and restaurant). However two issues have been problematic:

Short term funding and long term strategy – Regeneration takes time both in the planning and in the delivery but funding is often short term with deadlines for spend. This can result in decisions being made that while making a contribution do not maximise outcomes due to the inability to plan and work with other contributors. In Barry this pressure to spend also resulted in a lot of Council led initiatives being funded in the early days as they were ready to commit. These projects are worthwhile but led to a perception that the community was not involved enough in regeneration proposals. This brings us to the second issue.

The need to involve the community - Regeneration is not just about investment, it is also about achieving a change in attitude. Some of this can be done through marketing but much of it can only be achieved through effective engagement with local communities. In Barry ideas have been forthcoming from local people and should be supported but often these ideas need time and work to be developed into viable propositions. The lack of revenue funding and support meant that it was very hard to progress some of these early ideas to a stage where capital funding could be considered. As a result community groups can feel alienated by the process.

2. Should other national outcomes or principles be considered?

National outcomes are important in making strategic sense of the framework. However regeneration activity needs to be bottom up and locally focussed. This point is also covered elsewhere in this response.

As well as national outcomes and principles at the Wales level the impact of policies that originate with the UK Government needs to be considered. For instance Welfare Reform will impact severely on many of the communities and areas that we may want to regenerate. In fact the impact of these reforms may well work against regeneration outcomes by destabilising community sustainability and viability leading to further decline.

3. What more can be done to achieve greater coherence and cross cutting action across departments?

I would refer you to the response submitted by Community Housing Cymru which sets out very clearly and convincingly the role that the housing association sector has to play in achieving housing led regeneration. The sector is experienced in achieving added value through procurement (for instance by using the i2i toolkit), engages well with other sectors and acts as a

community gatekeeper, ensuring that the most disadvantaged have access to support and regeneration benefits.

The Welsh Government's budget is some £4.3 billion. Every effort should be made to maximise regeneration outcomes from this spend. It is important that the recognition of regeneration in Wales is not limited to the £34 million of activity funded through national programmes. Housing associations have demonstrated that regeneration at a local level and scale can deliver real community benefits. Investment is important but housing associations can and do deliver regeneration outcomes using existing funding sources and it is hoped that the Welsh Government puts them at the forefront of their plans. Not to do so would be a wasted opportunity.

The Welsh Government also needs to demonstrate strong leadership in promoting the aims of the regeneration framework. Too often representatives from different sectors are involved in regeneration discussions but appear to be more concerned about what funding or advantage they can achieve for their sector rather than what contribution their sector can make to the regeneration outcomes desired. This is hard one to resolve but it is essential if all stakeholders are to be aligned behind the achievement of regeneration outcomes and the Welsh Government needs to set out its expectation clearly, initially and internally within the Cabinet this has to be a task for the Minister.

4. Do you agree with the national, regional and local approach set out?

Clear governance is essential and duplication of roles and overlapping of responsibilities should be avoided. We are concerned that the Regional Regeneration Boards will be remote from the local delivery and there could be conflict. Local delivery needs to work within a framework so that wider regional and national outcomes are maximised but regeneration needs to be locally led otherwise it will not effectively engage the communities that need to be inspired and given confidence. The role of local authorities is vital but other bodies such as Community and Town Councils also need to be provided with a say as often they provide a strong link to the voice of the community.

5. Do you have any comments on our proposals for how we will target and direct our funding?

I recently met with the Minister in Barry and was pleased to hear him say that he wanted to target resources on potential as well as need. This is the correct approach and should be supported. Funding is best targeted where it can complement existing and new activity in a cohesive and strategic way. However while match funding is clearly important in maximising investment and outcomes, the pursuit of match funding should not result in regeneration activity being focused on those areas that are already significantly funded through European funded programmes. I will not repeat the Vale of Glamorgan's submission here but they have pointed to a wide range of existing activity that would support and provide match funding for a continuation of Barry as a funded regeneration area.

6. We want to ensure effective monitoring and evaluation of regeneration activities, will the approach set out achieve this?

Monitoring is an essential part of accountability and we would welcome the proposals to strengthen this aspect of regeneration activity. The focus needs

to be on outcomes but it has to be accepted that quick wins are not always possible and that longer term benefits may be more important. There is a need for all stakeholders to engage in the process of identifying and measuring outcomes in the medium to long term otherwise monitoring is in danger of falling by the wayside when the initial project moves to a longer term operating position.

Paul Roberts
Chief Executive
Newydd Housing Association

58. Chartered Landscape Institute

Vibrant & Viable Places – New Regeneration Framework
Consultation Response

We write to set out our response to the consultation document issued on 22 October 2012.

The Landscape Institute is the Royal Chartered body for landscape architects; the Landscape Institute Wales Branch represents the membership in Wales. As a professional organisation and educational charity, the Institute works to protect, conserve and enhance the natural and built environment for the public benefit.

The Institute champions landscape, and the landscape profession, through advocacy and support to our members, in order to inspire great places where people want to live, work and visit. The Institute works with government to improve the planning, design and management of urban and rural landscape. Our response to the consultation is set out below:

1. What is your feedback on lessons learnt from delivery to date?

Multidisciplinary working and community engagement is crucial to deliver vibrant and viable places. The natural capital of the Welsh landscape and cross cutting environmental themes in places must not be overlooked, they provide a valuable source and focus for integrated activities. Working with Natural Resources Wales will be an essential part of providing a rounded regeneration strategy for Wales ensuring that green infrastructure is at the heart of the mix that makes for vibrant and viable places. Together with national planning policy which supports that landscape considerations are an integral part of the process of delivering great place in Wales, lessons should be learnt from the exemplary work undertaken in the Valleys Regional Park initiative.

2. Should other national outcomes or principles be considered?

There are opportunities to measure the extent and quality of green infrastructure and public realm to support sustainable and quality local environments as outlined in 'Outcome Three Healthier Communities'. Reference should be made to work undertaken by the Forestry Commission: The future of Wales' Urban Woodlands and Trees. There is also research which finds a correlation between local environment and healthier communities, cross departmental/organisational working would pool scarce resources and provide a holistic overview.

3. What more can be done to achieve greater coherence and cross cutting action across departments?

Inter departmental/body/organisational working is crucial across government to understand the totality of the natural capital of Wales and how it contributes to the vibrancy and viability of places. It is of great importance that the various strands of sustainable development are integrated, a process supported by a green infrastructure approach to planning and designing successful places. Understanding the shortfalls and how they influence the character, context and potential of places is crucial; this would contribute to the holistic approach required to supporting the sustainable development principles of the government.

4. Do you agree with the national, regional and local approach set out?

Yes.

5. Do you have any comments on our proposals for how we target and direct our funding?

With reference to 6.3.iii Place based - we acknowledge that the housing led approach to regeneration will occur within both urban and greenfield sites. For completeness, the reference to historic character of place needs to include 'landscape' alongside built character i.e.

"We can capture local distinctiveness through characterisation – identifying how places have been shaped over time and what makes them special. We find historic character in settlement and landscape, where there is coherence and connection between local traditions in buildings, patterns of open space, topography, land use and land cover. These are the ingredients of unique identity, and we can use them to ensure that as places continue to change, they also keep hold of what makes them special. Cadw has been looking at a series of towns across Wales, each one of which has its own special character. CCW's LANDMAP also extends our understanding of Wales' landscapes. These studies set out a definition of local character which can inform the management of change"

Ensure funding is co-ordinated with other initiatives/bodies to maximise effectiveness.

6. We want to achieve effective monitoring and evaluation of regeneration activities, will the approach set out achieve this?

Yes, but must not be too onerous and divert attention from the issues of the activities.

59. Jane Hutt AM

See separate document

60. Newport Unlimited

Please find below the response from Newport Unlimited which I have been authorised by the interim Chief Executive to send.

1: The Newport Unlimited Board of Directors welcomes the opportunity to respond to this consultation document. They believe that the urban regeneration company model has worked well in Newport and there is clear evidence of the development brought forward, private investment levered in and jobs consequently created as a result. The Board was pleased to read that positive recognition in the background papers (Annex 1A, Vibrant and Viable Places, 2012).

2: The Board has contributed previously to Welsh Government consultations such as City Regions Report and the Wales Infrastructure Investment Plan consultation, which have covered many of the same issues regarding the delivery of regeneration in Newport. Therefore the Board would like only to highlight a number of key points which they have agreed are important to reiterate in response to your consultation questions.

3: The experience of the Newport Unlimited Board suggests that the potential for maximising success lies in having a clear strategy which is maintained over a significant number of years, a dedicated budget allocated directly to the local delivery agent for regeneration activities, and a Programme Board membership with strong connections with the private sector. The Board believe that the input of the private sector is crucially important. Businesses and investors should be fully involved in the proposed new Regeneration Framework, in the development of regeneration plans at the Regional Regeneration Board level and in the delivery of measures.

4: The Board therefore support the Vibrant and Viable Places proposal to create a number of local delivery agents within each proposed regional regeneration area. The Board also support the proposal that local priorities should be established and preferred delivery mechanisms identified at the local level in support of nationally set over-arching outcomes.

5: The Board would also like to re-iterate that any region regeneration bodies must have a clear regard for cross-border linkages between South East Wales and the economically strong Bristol and Severnside areas.

Best regards,
Dr Gillian Otlet.
Head of Performance
Newport Unlimited – Urban Regeneration Company

61. Anglesey Economic Regeneration Partnership

WELSH GOVERNMENT – VIBRANT AND VIABLE PLACES: NEW
REGENERATION FRAMEWORK CONSULTATION

January 2012

The Anglesey Economic Regeneration Partnership (AERP) takes a holistic view on economic matters in the region and is comprised of members from several different sectors. We welcome the opportunity to provide comments on the new regeneration framework.

The comprehensive consultation document is welcomed by the Partnership and we only have a few minor points to make:

Page 11 – Vision & Outcomes for Regeneration

- We support the Welsh Government's visions and outcomes for regeneration, however further clarification on how the outcomes will be measured/monitored would be beneficial.
- We welcome the ambitions of the outcomes & visions for regeneration, with the current economic climate & budget constraints it will be difficult to be successful in achieving all the proposed outcomes.
- Further attention should be given to rural areas and rural communities within the document, perhaps specific outcomes/visions should be addressed towards rural areas.
- Improvement of broadband and mobile coverage needs to be facilitated into the outcomes and visions; we believe it is a vital component of prosperous and learning communities.

Targeting and directing funding

- Further clarification is needed in the document on the future of Regeneration Programme Areas.
- The AERP supports the Regional Regeneration Programme Areas, which would greatly benefit Anglesey due to the opportunities currently on the Island.
- EU Post-2013 Structural Funding needs to be incorporated into the document. Further attention needs to be given into the possible alignment with EU Funding is required.

Results based accountability and evaluation

- The AERP agrees that Results Based Accountability should be central to any regeneration approach pursued, although we believe the document should recognise that visual regeneration impacts may take some time to develop in some instances.

62. Barry Town Council

We, as the Community Council fully support the Vale of Glamorgan Council's response to the Welsh Governments Consultation document on Vibrant and Viable Places – A New Regeneration Framework.

The Community Council and the Vale of Glamorgan Council have established a close working relationship and the Community Council wishes to take a bigger role in relation to matters concerning the town, including its regeneration. This is being achieved by the collaboration between the Vale of Glamorgan Council and the Town Council.

The Town Council is committed to improving economic growth and regeneration within the town of Barry and the Council feel that although much has been done to regenerate Barry, there is still a need for further investment within the town and without this continued inward investment and regeneration new investors who have committed to Barry may possibly reconsider their options.

Once again, I would reiterate that Barry Town Council concur with and support the response submitted by the Vale of Glamorgan Council.

Thank you,
Yours faithfully,
Cliff Lewis
Town Clerk

63. Phil Burkhard

Enhancements

1. Identify the top three national outcomes so that it is clear what the priorities are.
2. Build priorities around existing strengths and assets e.g. the Valleys Regional Park initiative plus one of its recent European funded transnational programmes (WECAN) is showing how the natural environment can be a driver for social and economic regeneration as well we as implementation a more financially sustainable regeneration model based on green, heritage and community project investment opportunities for business (e.g. www.wefundthevalleys.com)
3. Regeneration resources should be biased towards creating prosperous communities because without jobs all the other aspirations are less likely to be achieved and reliance on the public purse perpetuated.
4. Any funded regeneration posts should at least be for three years. Short time frames mitigate against being highly productive and delivering something that has an increased chance of being sustainable.
5. Improve private and Third Sector representation on Regeneration Boards. I have encountered initiatives where these Boards are 100% public sector. The reason often quoted to explain this is that who is best placed to represent, for instance, the private sector? The following are potential solutions:
 - Chairs of Business Clubs
 - Chambers of Commerce Board members
 - CBI + FSB representatives (i.e. to balance corporate and SME interests)
 - Wales Quality Centre (who have a cross business sector membership)
6. More business support (e.g. especially innovation) should be entrusted to the private sector and less to Councils. Business support is not a statutory public service and why do so many councils feel that the business community are exclusively their customers? Radical suggestions:
 - Give Regional (e.g. aligned to the three proposed regeneration regions) Chambers of Commerce Boards the responsibility to distribute loans and include WG, local government or Wales Audit Office representation to ensure QA / transparency.
 - Provide more opportunities for the private sector to be a lead partner

- Provide tax breaks for businesses that support independently verified regeneration outcomes
7. Welsh Government Delivery Unit to include private and Third Sector secondees.
 8. Review the Heads of Valleys Innovation Programme (HOVIP) model which was instigated by the private sector, supported by NESTA / WAG / 5 local authorities, became the UK Enterprise Support Initiative of 2010 and resulted in five areas of innovation best practice being identified in an independent review commissioned by WAG:
 - The three key aims of HOVIP (2006-10) were to:
 1. Help businesses in the region to develop and grow by doing things more differently and imaginatively (i.e. to become more creative and innovative)
 2. Help raise the profile of the region
 3. Provide innovative business support
 - The region was originally the Heads of the Valleys but for the last three years, the five Valleys local authority partners wanted the support extended to the Valleys as a whole, demonstrating that HOVIP was scaleable.
 - HOVIP headlines:
 - HOVIP is the UK Enterprise Support Initiative of 2010 (out of a record 150 entries) in the Awards judged by the UK Sector Skills Council for Enterprise (SFEDI)
 - HOVIP generated over £1.6million in mainly new business for Valleys SMEs (This was approved by MD's and owners and checked by a 6 week independent evaluation commissioned by WAG)
 - The latter represented a 209% return on public sector spend
 - HOVIP helped over 300 businesses and contributed to safeguarding over 4000 jobs
 - A WAG commissioned 6 week independent business audit of HOVIP (costing £10,000) endorsed the benefits and highlighted five areas of innovation management best practice
 - 70 members of the HOVIP Turning Heads Club (a unique cluster of HOVIP Innovation Award winners and entrants that grew to 115 members) responded to a survey and 100% wanted the Club to continue
 - Over 30 testimonials on the HOVIP website (www.hovip.org.uk) from customers (e.g. Design & Manufacture who said that we should be given more money because HOVIP had been so successful and others such as 2005 Sunday Times Top 100 SME Williams Medical Supplies), partners (e.g. UHOVI, Bevan Foundation and CREW) and sponsors (e.g. BT, Capital Law and the University of Wales Global Academy) requesting that HOVIP be continued because of the evidence of its success

64. Cardiff Council

Purpose

This report outlines Cardiff Council's comments on the Welsh Government's draft consultation document "Vibrant and Viable Places: New Regeneration Framework". It gives responses to the specific questions posed in the consultation as well as additional observations where relevant.

Background

The Draft consultation document reviews the current funding and implementation system for Regeneration in Wales, and suggests an amended approach moving forward. In summary, it proposes:

- A broader approach to Regeneration that recognises the importance of bringing communities and people out of decline as well as places, assessed against a new set of national outcomes.
- A more collaborative approach, across public, private and third sectors, and across government departments.
- A more holistic, joined up approach that recognises the collective contribution of Housing, Heritage, Business Enterprise Technology and Science, Communities First, Planning, Transport, Education and Skills, Tackling Poverty, Environment, Health and Procurement.

The framework anticipates declining funding streams but also suggests a move away from the traditional area based funding priorities to one which evaluates the wider benefits of given proposals against a set of criteria. A strong evidence base and "Results Based Accountability" also feature as mechanisms to evaluate and review inputs and outcomes.

A new governance structure is suggested to oversee and deliver the Framework. This consists of:

- A national Ministerial Advisory Group to oversee regeneration activity and to report to the Minister;
- Regional Boards to "provide oversight, planning and policy for the area and advice on how indicative funding could be spent", and
- Local delivery, usually via Local Authorities and relevant partners.

Responses

Q1 What is your feedback on lessons learnt from delivery to date?

Cardiff is not directly included in the current supported areas boundary, and so its interface with WG regeneration initiatives has been mainly though linked but separate sources, such as EU Priority 4 funding and the Physical Regeneration Fund. In this respect, our feedback on lessons learnt is limited and the comments below are given in this context.

The limitations of the rigid boundary approach outlined in the document are acknowledged, and the proposal to move away from this, towards a criteria based evaluation for fund allocation, is welcomed. Cardiff has always acted as an economic driver for the City Region and, in the past has had some success in regeneration without direct government investment. However, the current economic conditions have severely limited the private sector's ability to participate in the sorts of regeneration activities that we experienced in the last decade or so. Any continuation of a strict area based/zoned funding approach that excluded Cardiff would therefore be of significant concern. Access to WG regeneration funds and support will be essential, both to

ensure that the Capital continues to play its crucial and central role as the dynamo for the region, especially in terms of economy and market focus, and to provide additional confidence to unsure private sector partners. It will also ensure that we can better address issues in the City's deprived wards, which are currently excluded from most of the existing WG regeneration funding streams despite being amongst the most deprived in Wales, and despite the populations in these wards being greater than the total population in other local authority areas such as Blaenau Gwent.

Targeting Funding – The proposal for more open and transparent interventions under the new Regeneration Framework is welcomed. The lack of clarity in the selection of areas for SRA status, and the lack of opportunity to bid for WG regeneration funds outside the designated areas has been a concern.

'Worst-First' or Opportunity-Based Investment - There is a need for a more enlightened approach to managing urban change, focussing regeneration investment on areas of potential, rather than always targeting the 'worst-first.' Intelligence-led interventions are needed which include pre-emptive action in areas vulnerable to decline, to prevent them becoming the deprivation 'hot-spots' of tomorrow

Whole Life Costs – Regeneration projects have increasingly focussed on short-term deliverables, with inadequate consideration to longer-term financial implications and sustainability of projects (eg. public realm schemes deteriorating because of cut-backs on maintenance budgets / new facilities not being used to their potential because revenue budgets for operating costs are squeezed). Consideration needs to be given to ways of safeguarding investment (eg. commuted sums) in future programmes.

Community Focus - Programmes continue to be driven by macro-scale physical and economic regeneration aspirations, rather than local community needs. Insufficient attention has been paid to what matters for citizens and communities at a local level and, as a consequence, regeneration programmes have been less impactful in reversing community disadvantage than might otherwise have been the case. A redefined focus on neighbourhood priorities under the new Framework would help bring about more effective 'quality of life' improvements.

Coordination – Delivery of certain schemes has not been helped by a lack of coordination both in terms of aligning funding streams (eg. social housing grant and health capital grant for Loudoun Square) and in terms of managing finances (Targeted Match Funding and EU grant for Butetown.)

Long-Term Commitment – . As recognised in the document, regeneration outcomes require inter-generational timescales. A more measured, incremental approach to addressing both the physical and social needs of neighbourhoods, working at a pace which allows community members to become key stakeholders in the process, could form the basis of longer-lasting outcomes.

Q2 Should other national outcomes or principles be considered?

The outcomes listed are generally supported in principle. However there seems to be a missed opportunity to present a more sophisticated picture of how wider ranging WG aspirations can inter-relate and come together in Regeneration. The following examples may help to illustrate this point:

- The delivery of a “well managed historic and natural environment” will require the sponsorship of specialist skills development, which will present opportunities for local communities, and, if successful will ultimately create valuable local jobs and economies.
- A regeneration activity focussed on creating “sustainable and quality local environments” may include support for technical local innovation around higher risk products (e.g. innovative energy production or insulation), which can then be tested, refined, upscaled and manufactured in Wales.

Examples like this would help to present a compelling argument for “smarter regeneration” that delivers more, and where the outcomes endure and become self sustaining. This will be especially important given the current economic situation, and the likelihood of diminishing funding and resources. It could also help to frame any project assessment criteria, and encourage cross department buy-in.

Q3 – What more can be done to achieve greater coherence and cross cutting action across departments?

The text in this section is particularly welcomed, especially the recognition that Regeneration relates to many cross cutting agendas and is more successful as a partnership activity. However, the roles that each of the sectors has in delivering regeneration, and of how regeneration can itself deliver the goals of the individual sectors, could be made clearer. A sharper focus on shared outcomes and mutual success across departments, illustrated by example, may ensure wider ownership of the framework itself, and therefore greater coherence and cross cutting action. A clear framework, or guidance setting out key roles and responsibilities across departments, and linking to an assessment of potential shared outcomes may also be of benefit. The formal “Regeneration Appraisal” processes suggested in 6.2.iii of the consultation document could help here too.

Despite the broad ranging nature of this section, there still seem to be other sectors whose roles are fundamental, but missing or underplayed. For example:

Energy: The agenda for energy includes reducing demand and securing cheaper and greener sources of supply. There are links here with both social policy (especially in addressing fuel poverty) and with economic policy (in the development of products and services which could support local employment growth). The potential regeneration benefits of these activities are significant and should be clearly captured in the final document

Transport: Greater emphasis should be placed on facilitating and promoting use of sustainable modes of transport both within and between communities in the proposed regeneration framework.

Enabling more journeys to be undertaken by sustainable modes of travel, will improve access to jobs, services and opportunities, especially for those who do not have access to a vehicle. In particular, we believe that greater emphasis should be placed on improving access within communities on foot and by bicycle. The Welsh Government’s proposed Active Travel Bill will be fundamental to making sure local communities feel safer and more accessible by active modes.

There is also potential to link this agenda to the Health section by emphasising the health benefits of promoting active lifestyles. Reference should also be made to the Welsh Government's emerging 20mph zone agenda, as people feel safer walking or cycling in an environment where speeds are lower, in particular in areas of social deprivation where the likelihood of pedestrian road casualties, especially amongst children is high. The cumulative benefits of "demand restraint" on car use, measures to make public transport the most convenient way to travel, and facilitation of more active lifestyles will all contribute in a direct way to the regeneration agenda, particularly in more deprived areas. This needs to be captured more clearly in the Framework.

Tourism: The document refers in some detail to the potential contribution of heritage to regeneration outcomes and mentions evidence that participation in sports and cultural activities can help people acquire transferable skills. This should be widened out to include the part tourism and culture can also play in making regeneration schemes sustainable i.e. used by visitors as well as local residents. As well as bringing money into the local economy, the volume of visitors can make a venue, activity or attraction viable, helping create and support jobs.

Examples from Cardiff might illustrate the positive impact tourism and culture can have when incorporated into a regeneration scheme. For example, developments such as St David's and Cardiff Bay have had a clear impact on visitor numbers and revenue.

Between 2006 and 2011 revenue from visitors to Cardiff increased by 50% to £943 million, equating to around 45% of the tourism revenue for the whole of South East Wales. Over the same period visitor numbers increased 57% to 18.4 million (STEAM 2011). The most significant increase was in 2010, the first full year of operation of St David's Dewi Sant, when visitor numbers increased by 24%, and revenue by 17%. Cardiff Bay attracted 3.9 million visitors from beyond the city limits in 2011, a 31% increase since 2006.

Tourism also offers a positive example of regional working in South East Wales, with regional tourism strategies already in place, led by Capital Region Tourism with buy-in from local authorities and other partners.

Q4 – Do you agree with the national, regional and local approach set?

The need for overview and proper governance are acknowledged, particularly in the context of scarce resources. However, there are some reservations with the governance approach proposed in the consultation. Many of the most successful regeneration activities are those that have been firmly rooted in addressing local issues, supported by inclusive community engagement and based on sound local knowledge. This is reflected positively in the consultation document.

While the importance of collaboration and information sharing at a regional level is acknowledged, it must also be recognised that regeneration needs, priorities and pressures vary greatly within the proposed regional areas. Needs in Cardiff are materially different from those facing the SE Wales Valley authorities (eg role of district centres as social and economic hubs for local communities/ scale of deprivation on peripheral housing estates) / social cohesion issues associated with multi-cultural diversity).

Regeneration planning and decisions on how regeneration funding is targeted should remain, fundamentally, a local authority function, albeit operating within the regional context and aligned with national outcomes. The local level is not just one of delivery, it is also about community leadership, strategic direction, and democratic accountability, certainly in the Cardiff context and having regard to the scale and complexity of regeneration challenges currently facing the city. This is essential if regeneration programmes are to be embedded in local community priorities and needs, and overseen, owned and driven by local members who are elected to represent community interests.

Cardiff has well developed and successful partnership structures in place to serve the needs of its communities, including Neighbourhood Management teams reporting to the Cardiff Partnership Board. These are well placed to deliver local regeneration plans, based on multi-agency partnership working and informed by local needs and community intelligence.

Whilst we acknowledge that regeneration activities do need to address and respond to broader national outcomes, the policy making and fund allocation roles of the proposed Regional Regeneration Boards would need to be very carefully considered and constituted to ensure that :

1. Local issues and local communities remain at the forefront,
2. Local democratic accountability is not undermined, and
3. The distinction between collaboration facilitated via the Boards, and other forms of collaboration encouraged elsewhere, is clear so that one does not end up substituting for, or confusing the other.

In particular, the membership of any such boards would need to be very carefully considered, especially with regard to democratic accountability.

Furthermore there is a need to avoid, and where necessary correct, complicated governance arrangements which clearly overlap or are not coterminous, and cause confusion and competition for scarce resources. The proposal to focus on a more strategic approach which recognises functional economic geographies such as city-regions is therefore welcomed, but must be delivered in a streamlined and consolidated manner alongside other initiatives which also seek to develop regional strength.

Q5 – Do you have any comments on our proposals for how we will target and direct our funding?

In a general sense, the proposals in the Consultation document are encouraging, particularly in the breadth of considerations that will be drawn upon in the decision making process. The approach will ensure that good, holistic and well considered projects that deliver tangible benefits are supported, regardless of their location. The precise criteria for evaluation should be subject to more detailed consultation as they emerge, but the general thrust of this section is supported. There is, however, an opportunity to make clearer reference to the issues of smarter cross—portfolio and shared benefits referred to above. In addition, the constitution of the decision making bodies at the Regional level will need to be carefully considered in the context of our response to Q4.

The absence of any reference to the extreme financial pressures currently facing all public authorities risks appearing disingenuous. Rather than complementing and enhancing mainstream spend, the reality is that any additional regeneration funding is unlikely to do much more than plug gaps

created by year-on-year budget reductions in mainstream programmes. Moreover, its effectiveness will be limited by the lack of financial means to maintain and run amenities and assets delivered through regeneration programmes.

The indicative funding allocations referred to should be made to local authorities, rather than the Regional Boards, in order that they can be directly applied to local delivery priorities as well as providing a clear 'line of sight' in terms of accountability to the communities they are intended to benefit.

Revenue funding for business planning is welcomed but, without further details, there must remain doubts about whether this will be sufficient to compensate for on-going staffing reductions in local authority teams. The use of consultants, brought in on an increasingly frequent basis to take forward labour-intensive steps in the process, such as 'preparing a strategy', 'consulting the public', or 'evaluation' can also have some major downsides, as they have no long-term stake in the outcomes or community accountability. The extent and nature of business planning, auditing and monitoring must also recognise the resource constraints facing delivery teams, and needs to be both proportional and relevant, with transparency in terms of what information is required and why.

The reference to piloting some of the outlined approaches in 13/14 is noted. In taking forward Cardiff's District and Local Centre strategies, we would be keen to explore early opportunities to apply 'centre management' and 'meanwhile use' initiatives to this level of retail centre, which performs a vital component in our sustainable neighbourhood agenda.

It is disappointing that, in the current financial climate, there is not more emphasis on 'doing more with less' and applying regeneration funding to delivering 'smarter solutions' to community-based services. Investment in joined-up, multi-agency facilities, which offer gains both in terms of customer focus and in terms of cost effectiveness, could be a key regeneration deliverable under the new programme.

It is noted that the earlier references in the document to inter-generational timescales and programme cycles of at least 10-15 years are not repeated in the description of proposed investment streams. Stability in regeneration funding arrangements would be a significant contributory factor to successful outcomes, rather than the established pattern of a review and change of direction every 3-5 years. Longer term programmes would also assist greatly in delivering better value for money by avoiding circumstances where initial set-up periods and exiting processes take up large percentages of the overall project timescale.

Q6 – We want to ensure effective monitoring and evaluation of regeneration activities, will the approach set out achieve this?

The Results Based Accountability and Evaluation process is considered to be a good approach and one that will ensure that projects are targeted at the correct outcomes from the start. However, making this work will be resource intensive. It is encouraging that some of the funding will be available for "evidence, mapping & business case" activities, and this will be useful in embedding evaluation mechanisms into projects at the earliest stage. However, there needs to be clear guidance and realistic expectations around this, particularly:

- in the context of significantly diminishing resources at the local level in the public sector, and
- to ensure that the funds that should be targeted at delivery are not diverted disproportionately and unnecessarily into target monitoring and evaluation.

65. Cllr Ralph Cook

Dear Minister

Thank you for the opportunity to comment on your proposed new regeneration framework for Wales. I attach with this letter detailed responses from my officers to the specific questions you ask in your consultation document. In addition to these, there are a small number of strategic matters I would like to highlight as they will have a critical impact on the future economic regeneration of Wales.

As you rightly recognise, the economic conditions that we currently face are unprecedented, and are unlikely to improve significantly in the foreseeable future. In order to respond to these conditions there is a pressing need for clear and integrated approach that brings together issues relating to economic development, regeneration and spatial planning. It is imperative that Welsh Government puts in place a strategic development plan for the whole of Wales which sets out all of the major economic priorities and drivers and provides clear guidance for attracting private sector investment. This should recognise the value of targeting areas of potential for sustainable regeneration, rather than focussing on the “worst first” approach used in the past.

Furthermore there is a need to avoid complicated governance arrangements which clearly overlap and cause confusion and competition for scarce resources. The proposal to focus on a more strategic approach which recognises functional economic geographies such as city-regions is therefore welcomed, but must be delivered in a streamlined and consolidated manner. I look forward to working with you and colleagues in Welsh Government and local government to deliver economic growth and successful regeneration in Wales.

Yours sincerely

Ralph Cook

Cabinet Member for Strategic Planning, Highways & Transportation

66. Maritime Heritage Trust

MARITIME HERITAGE WALES LTD

Response to the Welsh Government's Consultation Document “Vibrant and Viable Places – A New Regeneration Framework”

As our title infers we have a significant interest in Wales's maritime past. We are part of The Maritime Heritage Trust a charity formed from the recent merger of two other organisations – The Maritime Trust and Heritage Afloat – and MHWL is focused on the maritime assets of Wales. We believe that protection and restoration of boats, ships, land structures, archives, artefacts and all the other elements of our maritime culture and heritage are best

supported through sustainable economic regeneration drivers such as tourism, social, arts, energy, technology, skills and job creation.

Wales has a 1000km coastline which together with its rivers and canals has been instrumental in creating the country it is today by connecting Wales to the world. Much of our history and industrial development has only been possible because of this. Indeed, many of our towns and cities – even some not on the coast itself - would have not have evolved without the economic drivers provide with this connection to the sea. The coal, iron & steel, copper, slate industries are certainly some classic examples.

It is, therefore, a disappointment to us that, when discussing Heritage, the Consultation Document contains no direct recognition even of the existence of the valuable heritage assets of Wales relating to the sea, rivers and canals.

When looking at both people-based and place-based approaches to the Regeneration Framework, the importance of Wales maritime heritage should be emphasised. We organised the recent conference – Resurgence: Riding the Wave of Success – at which speakers from around the world highlighted regeneration projects where the planned inclusion of the local maritime heritage was the central feature of their success.

When looking at the evidence-based approach these international projects can form important yard-sticks against which performance can be measured.

AIM:

Following the Resurgence: Riding the Wave of Success Conferences, the attached “Agenda for Wales “ was produced for us which identified the following opportunities that could allow our maritime heritage to play a key role in the future regeneration of coastal communities in Wales.

OPPORTUNITIES:

- (1) Commission an all Wales impact study to assess the value of maritime heritage to the Welsh economy.
- (2) Working with CREW to produce and disseminate best practice case studies.
- (3) Establishing a ‘Task and Finish Group’ to determine a strategic programme of action geared to maximising the heritage regeneration potential of communities along the Wales Coast Path through the identification of strategic regeneration projects in those communities and potential funding options;
- (4) Re-convening the myriad of organisations and agencies involved in maritime heritage across Wales that assembled at the October Conference as a ‘Standing Conference’ capable of ensuring that the findings of the ‘Task and Finish Group’ are implemented in an integrated and strategic approach;
- (5) Looking for support for a new Atlantic Area INTEREG IVB bid to create a new generation of maritime heritage, science and regeneration academies and visitor attractions with Wales in the lead and anchored by a major new development in Cardiff Bay with specialist satellite centres around Wales;
- (6) Looking for support to a Maritime Heritage Digital Community initiative and pilot projects across Wales as recommended by the MHWL feasibility study (Autumn 2012) for Visit Wales;

- (7) Adopting a strategic approach with the Welsh Government's 'Major Events Unit' for attracting a programme of international maritime events to Wales (such as the Tall Ships Race);
- (8) Looking for support for the creation of a global initiative, lead by Wales in collaboration with MIT/Harvard based upon radical and innovative thinking to support coastal economic growth and regeneration;
- (9) Examining opportunities for utilising a range of European and other funding to support these opportunities in a creative way;
- (10) Supporting a three year cycle of conferences, forums, and festivals focusing on maritime heritage as a catalyst for regeneration. Looking for support from Welsh Government and local authorities.
 - e.g. 2013 Forum in Swansea
 - 2014 Festival in Cardiff Bay.
 - 2015 Conference in Conway.

MHWL as an organisation is seeking to develop these opportunities, forming real regenerative projects in order to create a positive economic effect on the coastal regions of Wales.

CONCLUSION:

Although there is a need for some objective data on economic impact of maritime heritage today, its historical economic impact is indisputable. A co-ordinator for the sector is needed and MHWL can play this role very effectively, with some proven credentials and a network across Wales, Europe and the world which could provide the opportunities to learn from international best practice

MHWL would welcome the opportunity of working with the Government and with its key agencies, especially Cadw, in helping to place maritime heritage at centre stage in the regeneration agenda in the future.

67. Fern Smith

Response to Vibrant & Viable Places

1. What is your feedback on lessons learnt from delivery to date?

I hope that the following is useful in the form of offering feedback from an 'informal' regeneration partnership between Volcano Theatre and Coastal Housing Group which has been ongoing since 2011.

I am writing with experience of being part of the Swansea Creative Hub on Swansea High Street. My company Volcano Theatre made a direct approach to Coastal Housing the landlords and developers of the various sites on and surrounding High Street initially with a view to requesting use of a large empty retail unit for a one-off performance in Autumn 2010. Coastal Housing were very amenable as the then outgoing director was an arts supporter. After his departure, Volcano negotiated with Huw Williams, a consultant Coastal were working with to create connections with the local arts community. It transpired that Coastal had been convinced by the work and extensive research of Huw and others that everywhere - nationally or internationally- where regeneration of an area had been successful, it was artists and the creative industries who

had got there first, moved in to take advantage of cheap rents and had catalyzed the turn-around and subsequent redevelopment of an area. As at least some senior individuals in Coastal were amenable in taking the idea forward of a 'planned' arts invasion rather than leaving it to chance (which often takes much longer to regenerate an area), request was granted and later in April 2011, Volcano was invited to take up residency and lead on creating a multi-use arts space.

The impact on the local arts scene has been strong. There is now a centrally located urban space on High Street which can be flexibly used for conferences, informal gatherings, film shows, workshops and performances.

This could not have been achieved without the support of a number of key senior individuals who were convinced of the efficacy of this idea and saw that rather than it just being a 'benevolent act' on behalf of Coastal this was rather a tactical move to assist in the regeneration of one of Swansea's hardest hit areas, economically, culturally and otherwise.

Of course, much work has been invested in this from ourselves, Volcano, and we have also had to negotiate flexibility in the funding remit of Volcano with our prime funder Arts Council of Wales. The advantage to Volcano has been that we have a base for which we pay no rent or rates but which we have an informal agreement to make the space safe, attractive and accessible to a wider community of users.

Lessons for the company have been extensive from the time we have been there and hopefully there has been learning on the side of Coastal too.

It has taken an enormous amount of work, time and additional resources from Volcano to lead on this regeneration (ie make the space fit for purpose and manned per health and safety and public access/performance requirements).

ACW have also inadvertently become partners in the initiative as Volcano's work has extended to being curators of an arts space. The move and development of the space could not have been done without their support.

City & County of Swansea waived business rates in the first year of occupation and as Volcano is changing its status to a charity business rate exemption should be continued.

Volcano is in a position to bring in many users to this venue. The move has stretched the company's administrative capacity greatly and if this was a planned rather than accidental opportunity Volcano would have questioned whether it could make the move without having the management/curatorial capacity to run a building.

Volcano has shown it has the entrepreneurial ability and skills to rise to such a challenge. This could not have been managed unless it had the goodwill and buy in from the small staff of the company. Small, flexible arts companies where many people, although not on high rates of pay, share a common goal and commitment to the arts often have the ability to rise to such challenges

where more formalized private or public sector businesses would not be able to do so.

It is important to highlight the feedback from the many people coming to the space (in the region of 2000 to date). Users and visitors all share an excitement and enthusiasm for the space and feedback from local businesses has been very positive especially in a street hard hit economically where more shops close than open on a regular basis.

The High Street has become a focus for other arts events and is for the first time ever on the cusp of becoming a vibrant cultural hub. Since Volcano's move, Glyn Vivian, Locws International and Elysium have all presented events or exhibited work in the space and on the High Street.

Although research shows that regeneration follows arts development and this was the reason Coastal partnered with Volcano in the first place as time goes on and economic pressures increase this recognition of mutual benefit is increasingly important to highlight. The building currently occupied by Volcano was due for demolition in 2012 when Volcano's lease was to finish. The lease has been extended as Coastal's plans have changed. It is important to highlight that this important instance of cultural regeneration precariously rests upon the accidental use of empty spaces and the support of a few individuals. More formal recognition of this type of regeneration would enable it to occur more resiliently.

In an increasingly harsh economic climate it is vital that regeneration continues in this way and that the arts are seen to provide enormous and tangible benefits in terms of the vibrancy/attractiveness of place at a local, regional and national level. Often initiatives like this are thought of as just benefitting the arts. It is crucial that the extensive evidence which clearly shows that artists lead on regeneration in key deprived areas if tolerated or even supported is highlighted at a more strategic level. Acceptance of this knowledge as a fundamental tenet of regeneration would therefore need to influence policy on a local, regional and national level.

2. Do you agree with the national regional and local approach set-out?

Values, policies and initiatives should be reflected at all levels. It is important that the direction of flow of information is not always from the national to the local. Often the more pioneering ideas come at a very local level and can then influence thinking, process and action at a national level. Keeping the freeflow of information and feedback in both directions is crucial to holistic or systems thinking. Many researchers, commentators and consultants speak about the validity of systems theory and emergence for planning and policy. A systemic approach would be vital if Wales is to dedicate itself to radical and long-lasting change in terms of the twin goals of regeneration and sustainability.

3. Any comments or proposals on how we direct our funding?

It's so important at a time when funding is more restricted to strengthen commitment to creative thinking, innovation and risk-taking. Problem-solving

type thinking often goes hand in hand with cost cutting exercises. Constantly we must look at what is happening in different innovative forums and gatherings. Inspiration, a commitment to values and a sense that we are not in this alone is often “the difference that makes a difference”. More people are expected to do more things with less. We cannot do this unless we move forward with a shared sense of values and clarity of intention. Forums to discuss ideas, connect with others in similar or complementary fields, opportunities to be invigorated and excited by seeing new ideas in action are crucial when a global situation of this magnitude is to be faced without disillusion or overwhelm.

4. Should other national outcomes or principles be considered?

It is vital that regeneration policy continues to complement and be informed by Welsh Government’s commitment to sustainable development.

From my work on Emergence (an arts and sustainability initiative supported by Arts Council Wales/ National Lottery) Wales is seen from the outside to be doing pioneering work in this area. It is important that this work continues to develop and is supported by tangible projects and policies at local, regional and national levels. Otherwise there is a danger that WG’s widely seen commitment to sustainability is disregarded as green-wash and a pure public relations exercise. Sustainability, as we have seen from various government policies and global gatherings, has been seen to be something which can be paraded when efficacious to do so and then ignored as economic pressures increase. We are at a time where if one national government can really show that a commitment to sustainability has the potential to actually drive economic recovery, others will follow suit and Wales will become the real global leader it strives to become. It is crucial that ‘growth at all costs’ is resisted and that Wales has the courage to keep sustainability as a real and workable core organizing principle. As there are so many uncertainties in this area, a commitment to sustainability involves a commitment to taking risks, creative thinking and true innovation and not to give in to the pressure of well-worn/business-as-usual thinking. It is important that factors such as well-being, community resilience, fair resource use and minimal environmental impact become as important as GDP as an indicator of the recovery and success of a locality, region or nation.

5. What more can be done to achieve greater coherence and cross cutting action across departments?

Partnerships and collaborative working are essential skills to refine when developing joined-up strategies and projects. The benefits and learning of collaboration are enormous in that individuals, departments and sectors can influence each other to achieve more holistic thinking. However, successful collaboration and partnership takes more time and is reliant on trust, shared values, a commitment to learning from all involved. Collaboration is an art to be learned, not just a cost-cutting exercise and can be done well or badly. It is supported by a particular context of trust and creativity. It is also something we can get better at. It cannot thrive in risk-averse settings where people are not given sufficient freedom and responsibility to bring all their creativity to a

particular task or project. Values, policies, procedure, line management and systems of accountability often need to be questioned or reviewed to really enable creative and successful collaboration.

6. Want to achieve effective monitoring and evaluation of regeneration activities. Will the approach set out achieve this?

With projects and initiatives that create real change, often the outcomes are more emergent and less typically easy to express in bullet-point format. Many people, especially those adept at fundraising have now learned and are practiced in the art of completing a monitoring and evaluation process that never fails to make the project look indispensable. A highly target led evaluation process will often distract from the real success or failure of projects. However, monitoring and evaluation is crucial, especially when funds are increasingly limited. New approaches and models need to be constantly sought to ensure effective value for money and accountability whilst not encouraging blame culture, disallowing failure or penalizing innovation. As scientists concede, failure is unavoidable when truly interrogating a hypothesis. When working in new paradigms indeed it is the only route to success.

Fern Smith Creative Producer Volcano/Emergence
January 2012

68. John Adshead

New Delivery Framework: National Regional and Local Approach

Wales has an enviable reputation for pioneering practice in regeneration. The achievements made over a period of more than 25 years have ensured the survival and renewed prosperity of urban and rural communities right across Wales. This has largely been achieved by partnerships led by the public sector with the private sector involvement being on a project specific basis. With unprecedented constraints on public sector expenditure it is appropriate that the Welsh Government should now be exploring alternative models for delivering sustainable regeneration during a period of increasing economic and social need.

The following comments are focused on the key areas highlighted in the consultation document.

1. Lessons Learnt

The consultation document demonstrates the breadth and depth of regeneration activity that has been delivered right across Wales. There are numerous examples of emerging best practice that need to be fully evaluated and built on as part of this process. The new ways of working pioneered within the Mon Menai and North Wales Coast SRA are outstanding exemplars of what can be achieved in areas of exceptional need. These both highlight the value of partnership working in achieving maximum impact and change.

To be fully effective consideration needs to be given to how partnerships are structured. New ways of working need to be encouraged which maximise the input of all partners in particular the private sector. The role of entities such as

LBAV s and other JV arrangements needs to be fully evaluated. The public sector has substantial assets which in the past have perhaps not been as well managed as those in the private sector. Such structures offer the opportunity to unlock value in land and buildings and kick start new investment

The review also highlights the extent and persistence of deprivation in many communities. There are no quick fix solutions in regeneration and a “sticking plaster” approach only masks underlying structural failures, Regeneration is a long term process and 15 years is probably the minimum period within which sustainable improvement can be achieved. Any commitment to an area should however not be “open ended” and needs to be reviewed as part of on-going monitoring and evaluation. In the past some initiatives have attempted to build in “exit strategies” without fully understanding the implications for the long term sustainability of the area and its community.

The contribution which arts and culture can make to regeneration should not be underestimated. There are good examples in North Wales of locations where new facilities have acted as a catalyst for community arts as well as generating economic benefits such a Galleri in Caernarfon and the Ucheldre Centre in Holyhead.

2. Outcomes and Principles

The definition adopted within the review reflects current understanding and practice within the UK. It fails to take full account of the need to ensure that the regeneration process is financially robust and achievable within the prevailing local and national market context. Ray Mills partner regional development group PWC has developed the following definition which includes the need to consider the financial viability of the process in the context of market needs and opportunities:

"Regeneration is about making tomorrow's world better. Delivering sustainable communities in a fast-moving commercial environment demands partnerships of commitment, trust and transparency. Partners must have common purpose, a shared understanding of the pitfalls and opportunities, appropriate governance and a lot of patience. There is no one-size fits all approach. To deliver inspirational regeneration, on time and within budget, you need to be inclusive, responsive to local and market needs, adopt a flexible approach and put in a lot of hard work up-front, particularly in ensuring commercial and financial viability."

The private sector development community has an important role it can play in not only delivering physical solutions on the ground but also in providing commercial realism and rigor in the business planning and delivery process.

3. Coherence and Cross Cutting Themes

One the most important lessons to emerge from similar reviews across the UK has been the importance of joined up delivery to successful regeneration. The whole government approach adopted by the Cabinet in 2011 is a critical step in ensuring the there is a better joining up at a strategic level. It is important that this approach is effectively cascaded down to all levels of government. In the past there has been a tendency for teams to operate in silos with little evidence of cross departmental working.

Closer collaboration with Infrastructure/Property Teams is the perhaps the most critical area where clear benefits could be achieved. This would allow the resources and expertise within the Infrastructure Team to be more effectively utilised to deliver innovative projects that would also improve the property offer as well as kick starting regeneration. For this to happen there is a need to be more creative in the way property solutions are delivered using more innovative approaches such as LABVs referred to in more detail below.

4. National and Regional Approach

A more “strategic” approach is to be welcomed in principle. The success of such arrangements will depend on the role and functions the Regional “Boards “. To be effective they will need to have a significant influence on budgets through a more rigorous business planning process

The regional focus needs to ensure a “one size fits all” approach is avoided. The physical and economic structures of North and Mid in particular require a more fine grain and joined up approach to regeneration. For this reason the designated areas may look very different to those in South.

Leadership will also be key. If other partners, including the private sector are to be fully engaged effective management will be critical. The experience of key players within the business and private developer community should be drawn upon to effectively drive the process providing focus and a clear vision. Regional Boards should include a representative from Amber Green to ensure RIFW is able to facilitate projects at a local level in areas of greatest need and opportunity.

The paper is right to focus on governance issues. However if these new arrangements are to be successful there need for a relative “light touch” approach that avoids an overly bureaucratic bias which would deter the involvement of key private sector partners (Important lessons to be learnt from past success and failures eg Community Plans WSP NWEF)

Recognition of the valuable role Regeneration Officials play in delivering solutions on the ground is to be welcomed. If these Officials are going to be properly co-ordinate the input from different parts of Government it is important that their roles and remit are fully enshrined within the new structures so they have sufficient “clout” to deliver very complex and challenging solutions.

In developing an evidence based approach it is important to focus on the economic and community “potential” of an area. Every community however defined will have unique USPs (as well as specific problems and issues!) These may not be immediately apparent but need to be developed and tested with the local partnership as part of the business planning process

Any decision on priority areas needs to be part of a challenge process. An element of “competition” within the selection of priorities can be positive when openly and fairly managed.

The selection of priority areas should only be concluded when all communities within each Region have been give adequate opportunity and support to develop a business case. This might take the form of a two stage process to avoid unnecessary cost or commitment from individual communities.

The benefit of collaboration as in the case of the North Wales Coast SRA should be fully embraced and encouraged.

Key strategic opportunities such as those offered by Holyhead and its port should not be lost or diluted in an attempt to be seen to be addressing all areas of need . In measuring these opportunities it will be important to identify how these impact on the wider region and Wales in terms of for example competitiveness and international image (cf the increasing importance of Holyhead as a cruise destination)

The importance of any national strategy and individual area based plans to investment by the private sector and investor/developers should not be underestimated. In times of continuing market uncertainty and volatility any clarity and consistency which the public sector can facilitate can only help improve confidence and long term investment.

Distinctive and vibrant places should of course be at the heart of any successful regeneration programme. The character and identity of so many towns is changing with the continuing loss of retail activity. If such places are to succeed and thrive they will need to develop new niche markets. For this to happen there needs to a radical shift in planning policy and town centre management to allow for a far greater mix of uses and development for example to include workshops, studios and residential within areas which have traditionally been maintained as purely “retail zones”

5. Funding

The commitment to greater revenue funding is important to the long term success of this strategy.

More consistent funding for town centre management will be critical to success. Evidence from the positive impact prolonged action in towns such as Colwyn Bay demonstrates the value to increasing the vitality and viability of town centres

Funding for HRAs could be more effectively targeted. Little progress has been made in promoting HARPs and other “Living over the shop “ initiatives.

Working with RSLs and others there is a real opportunity to provide much needed affordable accommodation and ensure town centres once again become living communities themselves.

In tackling the problem of vacant/empty space in town centres both the stick and carrot approach need to be taken. A further urgent review of empty property rates is needed to ensure there is a greater “incentive” on property owners to bring forward proposals for their properties

6. Evaluation

Better evaluation is to be welcomed, especially at a time when resources are likely to be more constrained. It is however important that monitoring does not become too prescriptive and adequate emphasis is given to “qualitative” as well as “quantative” assessment.

The early evaluation work carried out by Wavehill Consultants in Rhyl demonstrated the value of real qualitative assessments. This included the perception of local people about their area and the impact of regeneration initiatives on this and on their lives. It is always important to not lose sight of the primary objective of any intervention at a local level.

69. Industrial Communities Alliance Wales

VIBRANT AND VIABLE PLACES: A NEW REGENERATION FRAMEWORK

1. Introduction
- 1.1 The Alliance is of the view that there is much to commend the proposed new framework, particularly in terms of its recognition of the need to establish a meaningful regional and sub regional spatial policy context to guide and inform the formulation and delivery of regeneration activity. This has been a recurring theme of successive submissions made by the Alliance to the Welsh Government, particularly in respect of the known shortcomings of the Wales Spatial Plan. The explicit acknowledgement of the vital role played by local authorities in delivering regeneration initiatives is also welcomed.
2. Q1 What is the feedback on lessons learned from delivery to date?
- 2.1 Beginning with the Strategic Regeneration Areas, which have been the cornerstone of Welsh Government regeneration policy in recent years, the benefits of establishing partnership arrangements which work across geographical, organisational and sectoral boundaries are acknowledged as an obvious strength of the approach. Following its launch in the Heads of the Valleys area the Alliance welcomed the initiative as a positive step forward in terms of ensuring that regeneration policy had a spatial dimension which, in theory, could provide the basis for targeting resources on the poorest areas. It remains a strongly held view of the Alliance that the spatial targeting of the poorest communities should be a central plank of Welsh Government regeneration policy and that supporting mainstream policies should also have a strong geographical dimension. In practice, however, the experience gained in respect of the Heads of the Valleys and Western Valleys SRAs has fallen somewhat short of expectations.
- 2.2 The principle concerns centre on their underperformance in terms of addressing some of the deep-seated economic issues which characterise areas such as the HOV and the Western Valleys. This stems from a number of factors. Firstly, despite their high priority on the regeneration agenda, the allocation of resources has been insufficient for the task in hand. In the case of the HOV SRA, some £10m per annum over 15 years is not sufficient to bring about the necessary transformational changes to the areas concerned. Strategic projects capable of delivering significant economic benefits have been largely absent, which is also a reflection of the absence of a wider policy context – the Wales Spatial Plan has not provided the necessary overarching planning and investment framework for the SRAs. The impact of the expenditure has been further constrained by the failure to generate significant levels of private sector engagement and investment in the delivery of the strategies, which in general have been poorly focused and lacking strategic direction. Poor integration with Communities First, DWP programmes and broader economic business support, has also limited the impact of the limited resources allocated to the SRAs.

2.3 Communities First, another flagship regeneration initiative, and one to which the regeneration framework is explicitly linked, would also have benefited from having a well-defined strategic objectives, with clear routes of progression and a long term vision, explicitly linked to the wider regeneration framework. There should have been a rigorous and common framework for monitoring and evaluation across all partnerships to ensure that strategic regeneration outcomes are being delivered. The recently 'simplified' operational structure still appears to be over-complex with several tiers of management, ranging from regional programme boards to community hubs. Delivery and operational structures should be simple and unambiguous with clear lines of accountability. The focus within the Welsh Government should be on the integration of the different policy streams and initiatives into a more holistic approach.

3. Q2 Should other national outcomes or principles be considered?

3.1 The Alliance supports the broad thrust of the proposed regeneration framework in terms of supporting outcomes linked to delivering prosperous, learning and healthier communities, and the need to under-pin the Communities First Programme and the Welsh Government's Programme for Government. However, whilst the emphasis is on achieving national outcomes, the absence of any spatial dimension to the desired outcomes limits the usefulness of the framework as a strategic policy tool. This has been a recurring theme in previous policy documents such as the Economic Renewal Programme. Many of the issues surrounding Wales' relatively poor economic performance, particularly in terms of employment rates and productivity, have their roots in the high levels of economic inactivity, weak labour markets and skills deficits evident in the South Wales Valleys. The ability to prioritise resources and actions in favour of addressing these deep-seated issues in the Valleys will be the key to achieving the wider national outcomes, and as such the framework would benefit from explicit recognition of this linkage. More explicit acknowledgement of the growth and jobs agenda would also help to give the regeneration agenda a tighter focus.

4. Q3 What more can be done to achieve greater coherence and cross cutting coherence across departments.

4.1 As a devolved administration, the Welsh Government is in many ways better placed to secure the benefits of greater departmental and policy coordination than say its Westminster counterpart, given its relatively small scale and geographical focus. Securing community benefits through the public procurement process is one example of where the Welsh Government is leading the way.

4.2 However, whilst ministerial portfolios necessarily impose practical constraints on the degree of cross-cutting activity, there would appear to be some scope for improving the level of high level coordination within the Welsh Government, particularly in respect of Regeneration, Housing and Heritage and BETS. Recent events surrounding the wider regeneration agenda is a case in point; the future direction of

regeneration policy is, for example, linked to at least three policy statements – Vibrant and Viable Places, City Regions and the new Regional Planning Framework. Coordinated statements would have provided much-needed top down momentum for more effective joined-up delivery, which in turn would motivate the engagement of other Welsh Government departments and its partners in the public, private and third sectors in helping to make cross-cutting activity more commonplace. In practice, however, all have been subject to differently timed announcements. Nevertheless, the recent decision to establish the City Regions’ Task and Finish Groups for SE and SW Wales is welcomed by the Alliance and it is hoped that their work be completed as soon as possible, given that the proposals for the new regional structures are inextricably linked to the delivery mechanisms set out in Vibrant and Viable Places.

- 4.3 Establishing a national regeneration framework which includes key performance indicators covering all programmes would also help to ensure that greater coherence across departments and agencies, as would having fewer but broader-based initiatives

- 5. Q4 Do you agree with the national, regional and local approach set out?
- 5.1 Regarding the proposals to establish the three regional regeneration boards, the Alliance has on many previous occasions highlighted the need for a more effective regional policy and delivery structures. In this respect, therefore, the Welsh Government’s proposals are a welcome step forward and in principle they go a long way towards addressing what have been obvious weaknesses in spatial planning and the prioritisation of regional investment decisions. To be effective, however, they will need to be accompanied by a re-alignment of Welsh Government policies in order to establish a clear sense of direction. In principle, however, the proposals are welcomed by the Alliance.
- 5.2 There remain, however, some fundamental questions over the constitution of the regional boards and the Ministerial Advisory Group and their respective relationships with other groupings. In particular, there is a need to resolve the uncertainty arising from the absence of detailed proposals for the city regions, given the obvious overlap with the delivery proposals set out in the new Regeneration Framework. This needs to be addressed with some urgency, if there is to be a meaningful discussion on the constitution and responsibilities of the regional boards. In a similar vein, there are concerns on how the new boards will build on the activities of the WLGA’s Regional Partnership Boards which have been developing their own regional strategies.
- 5.3 The announcement made earlier this year regarding the future of Communities First, which proposed 6 new regional boards in relation to overseeing the activities of the CF clusters, also raises issues of the potential proliferation of delivery structures at the regional level. More recently, it was announced that there would be seven Enterprise Zone Boards which, again, raises concerns over relationships and coordination on the ground between a multitude of structures. Building on existing arrangements and experience is therefore important and

necessary, as is the need to avoid duplication and any confusion regarding the respective roles and responsibilities of the boards proposed to date.

5.4 In proposing the new framework, the consultation document prefaces the discussion with references to the delivery of regeneration initiatives being a fundamentally local issue in which local authorities and local communities have key roles to play. It is not clear at this stage, however, as to what role local authorities will have in terms of representation on the regional boards and how accountability will be built in to the new arrangements. Moreover, the setting up of regional teams by the Welsh Government to support the boards could lead to more centralisation, a criticism which has been levelled at some of the SRAs. Assurances with regard to local authorities having equal and meaningful roles in the new structures are therefore sought.

5.5 Turning to the Ministerial Advisory Group, it is clear that this will have a pivotal role in terms of setting the overall direction of regeneration strategy, overseeing investment decisions and considering the business plans of the regional boards. As such it will be a powerful and influential group where accountability and representation assume particular significance. Further clarification is required on the composition of the group and how conflicts of interest will be avoided where representatives have a mutual interest in both the Ministerial Group and the investment plans of the regional boards. Although this may be a particular issue for local authorities, given that the WLGA is currently represented on the National Regeneration Panel, it may also be a matter for the private and third sectors. At the same time, it will be important to ensure that the panel is independent of the Welsh Government if it is to advise in an impartial manner.

6. Q5 Do you have any comments on our proposals on how we target and direct our funding?

6.1 The Alliance is strongly of the view that targeting resources towards initiatives which support the growth and job's agenda should be the main imperative, together with the need to ensure that there is a strong spatial dimension to investment decisions with the focus on those areas with the greatest needs. In addition the formula for allocating funds to the three regeneration boards should reflect these requirements. The Welsh Government should ensure that funding decisions on other economic initiatives, such as the Enterprise Zones, become integral parts of regeneration activity. It is also important to ensure that spreading resources over too many investment streams does not detract from strategic investment priorities capable of bringing about significant benefits within the regeneration areas, particularly during a period of severely constrained expenditure. In this respect, close alignment with structural fund priorities will be essential in terms of leveraging in additional resources for key projects, as indeed will be the need for innovative financial solutions to maximize private sector leverage.

7. Q6 We want to ensure effective monitoring and evaluation of regeneration activities., will the approach set out achieve this/
- 7.1 The proposal to embed a Results Based Accountability (RBA) approach into the regeneration process, with the emphasis on best practice and value for money, is welcomed. This should be regarded as a given', although a balance will need to be struck between what constitutes necessary data and that which will enable investment outcomes to be effectively monitored and evaluated. Maximizing the synergy with other programme/project management approaches, such as those related to the structural funds, should also be a central aim. In addition the regional boards should be equipped with the necessary capacity to secure the monitoring and evaluation of their investment decisions from independent source.

Peter Slater
Director
Industrial Communities Alliance, Wales

The Industrial communities Alliance (Wales) is part of a UK-wide network of local authorities representing the industrial areas of England, Scotland and Wales. The Alliance was formed from a merger of the Coalfield Communities Campaign and Steel Action and its member authorities in Wales comprise: Blaenau Gwent CBC, Torfaen CBC, Merthyr Tydfil CBC, Caerphilly CBC, Rhondda Cynon Taf CBC, Bridgend CBC, Neath Port Talbot CBC, Carmarthenshire CC and Powys CC. The Alliance's main interests centre on the economic, social and environmental regeneration of the older industrial areas of Wales and the need to close the prosperity gap between these and other parts of the UK.

70. CREW

See separate document

71. Dylan Rees Llangefni Town Council

My overall response to the above consultation document is that I generally agree with the analysis and objectives contained in the report. What interests me is how the vision contained in the document can be practically applied so that it will provide regeneration within my own town of Llangefni. Currently there are a number of different groups/organisations who are seeking to bring about regeneration including the following:

- Cwmni Tref Llangefni
- Communities First
- Menter Mon
- Chamber of Commerce
- Llangefni Market Steering Group

However, Economic Development (and the Department of Anglesey County Council) the Council's stumbling progress to further progress is the lack of an integrated strategy which can be driven forward by a dedicated co-ordinator. Someone who can

lead and champion all this partnership work. Consequently, for a “town team” to be effectively established there has to be funding put in place to provide such a resource. This is what Llangefni currently lacks and desperately needs. Suitable funding, together with effective partnership working, has helped to transform Holyhead Town centre through the “Empty Shops” initiative. The will exists in Llangefni to see a similar transformation. However resources to enable this to happen are paramount. Whilst I appreciate that towns all over Wales are competing for funding from the Welsh Government the recent news that the Vion plant in Llangefni is likely to close with the loss of 350 jobs surely helps to prioritise our case.

Dylan Rees
Town Councillor and Mayor of Llangefni

72. Tourism Partnership Mid Wales

WELSH GOVERNMENT CONSULTATION DOCUMENT: VIBRANT & VIABLE PLACES NEW REGENERATION FRAMEWORK
RESPONSE TO THE KEY QUESTIONS

1. What is your feedback on lessons learnt from delivery to date?
Regional collaboration will be essential moving forward but any plan for a specific region must be owned by the region and its partners and there must be recognition of sub-regional variations such as identified for the Mid/Central Wales are the former Spatial Plan. This will enable greater focus and agreement being more easily achieved by likeminded partners. A local delivery mechanism is seen as essential for partnership participation. Too large a region within the rural areas of Wales mitigates against this type of delivery.

While it would be commendable to direct targeted investment substantially based on job created opportunities, there also needs to be a focus on projects that will make the difference to a local area, maintain and increase the quality of life for residents and sustain employment levels. Many rural communities are declining in terms of infrastructure, social structure and employment opportunities. Measures need to be developed to halt this decline and provide for greater retention of population, particularly young people. The Local Growth Zone initiative in Powys is welcomed and if successful should be rolled out into other areas.

Rural Development Plans have had different degrees of success. The mechanisms adopted for delivery of the current round, particularly in the rural areas, which are characterised by a disproportionate percentage of micro businesses and enhanced issues around match funding, have encouraged a plethora of small scale non sustainable micro projects which will bring no long term benefits to the business or the local economy. Future programmes while encompassing a flexible approach and based on local delivery need to be more joined-up in their approach and delivered on a sub -regional basis.

The timescales for programme delivery should also be longer to ensure a realistic timetable for development and delivery of programmes. The current timescales have demonstrated that 3 years is too short a time and has encouraged short term small, disparate projects.

Building sustainable and resilient communities and places through integrated support and regeneration should remain as a focus.

2. Should other national outcomes or principles be considered?

The delivery of regeneration on the basis of a holistic approach to an integrated set of activities which recognises the complexity of the issues involved in social, economic and environmental decline is therefore welcomed as this is seen to be crucial in such areas as rural Mid Wales. The Vision and National Outcomes are to be supported. In terms of tourism, which is an important economic sector particularly in rural areas development and management on a Destination basis is thought to be practical way forward. It facilitates collaboration at a local and community level and includes the public and private sector working together to a clearly defined goal.

Outcomes should be designed to reflect regional benefits as well as national benefits and be measurable on a scale that is appropriate to the region.

3. What more can be done to achieve greater coherence and cross cutting action across departments?

The people and places approach is endorsed.

Spatial planning will continue to be a major focus that will require the inclusion of sub-regional level of activity to the national, regional and local levels proposed. The integration of differing rural activities is seen as crucial to sustainable growth in rural areas. The potential of inland and coastal rural wales has been considered in a number of strategies and studies over recent years, some of which were further endorsed by the Central Wales Spatial Plan and in many cases the recommendations are still valid. The linkages between primary production of food and the development of local food related manufacturing and food outlets is increasing. More recently the Rural Forum report on Unlocking the Potential of the Uplands has provided a focus on the potential of increased diversity in farming and rural businesses.

Joint working at national, regional and local levels is crucial. In terms of tourism this is particularly pertinent. The Local Food Talks initiative delivered on a regional basis between the Regional Tourism Partnership (TPMW) and FFMD is just one small example. A further example is the Cambrian Mountain Initiative which is an integrated regeneration project linking together ecological and environmental projects, led by CCW; a Food and Farming strand support through a Supply Chain efficiency strand and delivered by a private company support by the Prince's Charities in Wales; the development of the Cambrian Mountains as a tourism Destination led by TPMW and the LAs; and community development activities linking into LA programmes and a Sustainable Communities project again led by CCW.

4. Do you agree with the national, regional and local approach set out?

The new delivery framework and key roles should include reference to sub-regional as well as local, regional and national basis. The local basis should have strong focus upon local delivery.

The regional approach places greater emphasis on cross-boundary cooperation which is essential but the current footprint for South West and Mid region is geographically too large with few similarities across the area

particularly with regard to rural Powys where there is little synergy with the south western counties. This is seen as a potential barrier for collaborative working at the “new” regional level which is why the inclusion for working at a sub-regional level should be considered.

5. Do you have any comments on our proposals for how we will target and direct our funding?

The business plans should include reference to overarching vision for rural areas and acceptance that there is a need for flexibility “one shoe does not fit all”. The place-based approach is welcomed.

Enhanced marketing and destination management with the marketing of investment of all types whether for inward investment and visitor marketing investment sharing common brand values, characteristics is welcomed.

Dee Reynolds
Regional Strategy Director,
Tourism Partnership Mid Wales
13 January 2013

73. Cliff Croft

What is your feedback on lessons learnt from delivery to date?

Before becoming aware of the present Welsh Government Regeneration consultation, I wrote the comments attached on Neath Port Talbot Corporate Plan 2012-2015. From these written comments it can be seen that in order to attain satisfactory outcomes there is need of a different approach to planning and design of Built Environment Regeneration projects.

The Built environment should be pleasing on the eye, accessible by Public Transport, and usable by all.

From the Local point of view, an accessible environment assists the independence and equality of disabled people and may take pressure from the carer’s services.

Para 3.1 talks of reduced Capital expenditure, This makes the need for correct Evaluation of Town Centres and Seaside locations and of final detailed design.

Para 3.2 recent Welsh Government Practice although providing programmes for improvement of deprived areas has failed to provide environments that are accessible and suitable for use by all.

Para 3.3 Emerging Programmes are agreed, but will not deliver inclusive environments without more detailed guidance and adherence to the Public Sector Equality Duty.

Should other national outcomes or principles be considered?

Para 4. Our Vision and Outcomes for Regeneration

Para 5. Our principles for Regeneration

Para 6. Our New Regeneration Framework

These are generally agreed

6.1.ii The Third sector, Care must be taken to ensure engagement with Pan disability groups and Official design guides.

In areas where Pan Disability Groups have failed Local authorities should endeavour to get new groups working; funding them where necessary.

Heritage. Buildings have always been altered, e.g. new door or window locations, to suit the needs of the day. Working listed Buildings should likewise be made accessible.

CADW Access Policy states The aim in dealing with adaptations as part of the statutory planning process should be to seek solutions to overcome barriers in a positive way.

6.1.v Other Government areas are acknowledged.

Bullet 3 Planning. During the past twenty years a great deal of work and effort has gone into designing a planning system that will give an inclusive Built environment.

Cooperation of Officials and Disabled people has ensured that Building Regulations, British Standards, Footway design, Countryside layout, etc have been developed that will give the necessary inclusive environment .

A positive statement should be given that these guides must be adhered to.

Bullet 4 Transport. In order that we older people and disabled people may use transport independently, better attention is required to the design and layout of our public Transport terminals and local bus Stops.

e.g. Seats are required in positions that will allow a waiting disabled person to take his place in the queue. At present some disabled people are complaining that other people in the queue do not let them board in turn.

Health

With the centralisation of Specialist areas of treatment there is need to ensure appropriate Transport between home and Health resource.

74. Cllr Richard Bertin

Having considered the matter I wish to support the following comments:

- 1 - Barry has seen the same decline as valley communities over recent times.
- 2 - Barry does not qualify for EU funding.
- 3 - The Vale of Glamorgan Council receives less funding than its neighbours.
- 4 - Barry has areas of deprivation but often misses out because the county is an affluent area.
- 5 - Barry is a seaside town in need of investment.

I would ask that these points are taken into consideration and that regeneration funding continues to be given to the town of Barry.

Yours faithfully,
Cllr. Richard Bertin,
Independent,
Vale of Glamorgan Council.

75. ICE

Vibrant & Viable Places: A New Regeneration Framework.
A Welsh Government Consultation Document.

In responding to the questions identified in the consultation document, ICE Wales Cymru responds as follows:

ICE Wales Cymru is a member of the Regeneration Skills Collective Wales and supports fully the submission made by RSCW to the consultation. In particular, ICE Wales Cymru considers that as there is a clear relationship between the condition of a country's infrastructure and its economy, RSCW would therefore recommend that continued investment in infrastructure is vitally necessary. As this infrastructure is needed for the regeneration of Wales it is even more important to ensure that funds are prioritised into infrastructure.

It is also vital to ensure that full partnerships across all Government bodies, the public sector, third sector and private exist and a whole government approach to integrated and sustainable regeneration.

Recognition that sustainable development (and sustainable regeneration) has three pillars: Economic, Environmental and Social. The correct balance is important and in the social elements it is vital to ensure that local products are sourced and used with local jobs for locals, legacy clauses in regeneration contracts must ensure that the local Welsh communities are protected, regenerated and enhanced.

There is a growing concern about professional skills in Wales; it takes a great deal of effort, finance, commitment and time to train a professional (e.g. Professional Civil Engineer). Unless there are the opportunity for these Professionals to practice these skills will be lost elsewhere.

Keith Jones

Director, Institution of Civil Engineers Wales Cymru

13th January 2013

- The Institution of Civil Engineers (ICE) was founded in 1818 to ensure professionalism in civil engineering.
- It represents over 84,000 civil engineers in the UK and across the globe and has around 3,500 members in Wales.
- ICE has long worked with the government of the day to help it to achieve its objectives, and has worked with industry to ensure that construction and civil engineering remain major contributors to the UK economy and UK exports.
- For further information visit: www.ice.org.uk and www.ice.org.uk/wales

76. Swansea BID

RESPONSE TO : The Welsh Government and the Consultation Document 'Vibrant and Viable Places'

FROM : Swansea Business Improvement District (a representative view of the membership which currently stands at 816 Businesses)

Author : Juliet Luporini (Vice Chair)

Background information and general observations

Since achieving our highly successful revote ballot as a BID in August 2011 we have seen our company develop immeasurably, not only in terms of our British BID accreditation and international acclaim, but perhaps more importantly in the role this model and mechanism can achieve in terms of town and city centre regeneration. We have recently taken part in the National Regeneration Summit in North Wales and the Workshop in Neath which considered this consultation document. We are delighted to have been given the opportunity to be part of this important process and movement, which endeavours to drive forward a far more sustainable and inclusive type of regeneration which focuses on the human as well as the physical assets at our disposal.

In summary the objectives of the BID now fall into two clear categories:

1. Operational objectives (short to medium term) : To improve, enhance and regenerate the trading environment by making it as vibrant as possible by increasing foot flow, trade and profitability . Supporting and attracting business to the area (meanwhile use, entrepreneurial packs etc), the provision of business benefits (reduced energy costs etc) thus promoting a sustainable trading environment with a rich retail offer which recognises the importance of the independent as well as larger national retailers and businesses.

2. Strategic objectives (medium to long term) : involve the long term vision for our city centre and the community as a whole, of which regeneration strategies, their concept and planning are key features. Coupled with the strategic growth and vision of the company through acquisition of assets and the delivery of more services, achieved through partnership working and understanding the needs of the community and environment we operate in. Most importantly these objectives have been largely achieved by opening communication channels with and the bringing together of the major stakeholder groups, this has allowed the engagement and empowerment of the business community thus allowing them to respond more effectively to the external environment whatever the stage of the trade cycle. This collaborative working between the Local Authority, BID, third sector and yourselves has allowed much greater synergy of resourcing and joined up working.

Therefore we are very encouraged by this consultation document as it clearly employs the strategies and mechanisms that the BID holds as vital to achieve the cultural change and lasting regeneration that is clearly required in our towns, cities and communities.

Lessons Learnt

1. Dynamic lasting and sustainable change requires a balance of both people and place..the inclusion, engagement and hence empowerment of all stakeholders are essential to drive forward change and indeed regeneration. True collaboration and partnership working allow the synergy and smart efficient use of resources for both the physical and human aspect..which underpins the vital ingredient for any type of sustainable economic growth. An integrated and holistic approach is essential to achieve the outcomes outlined in the document and indeed fully analyse and evaluate the impact of projects and outcomes on a local, regional and national level.

2. The practicalities of this type of joined up working

Representation:

All stakeholders need to be represented at National, Regional and Local level..this will require a radical rationalisation as there are far too many groups and organisations whose remit no longer fits a modern society or are truly representative of its members views. For example BIDs are far more representative than Chambers of commerce and Business clubs. Having attended the regeneration summit in North Wales and the Workshop in Neath this view was voiced by many, particularly where there are too many organisations duplicating with varying degrees of success the work of others. Therefore the rationalisation of these organisations and the true representation of the stakeholders at all levels will be key to the success of the quality of the outcomes.

Meaningful partnerships:

BID has long since realized that true collaborative working requires open communication, understanding and respect for each other's objectives and priorities, this can only be truly achieved by involvement of the stakeholders at concept and then strategic stage. The lessons from success stories in terms of regeneration appear to hold a common theme. These lessons seem to include the development of the vision for a region, city or town, which capitalises on the USP which is agreed by all stakeholders at concept level. Thus through consultation allowing the engagement and empowerment of people to drive forward the vision and goals with both courage and conviction. Backed by the understanding and the agreement from Political parties that the long term vision will be followed regardless of the party in power (Norway has been particularly successful with this approach as have many others). This allows for the effective use of the human aspect of intellectual capital from a range of perspectives, particularly for those who live and breathe the impact of the decisions made on the ground level. This type of regeneration maximizes the effectiveness of place and people, as business and private sector confidence is higher where a plan offering clear stability and vision where goals are understood and are in place, encourages the required inward investment, as well as the multiplier effect. Conversely, stakeholders become quickly disenchanted and apathetic about giving up their time freely if it is felt 'lip service' is being paid to their input rather than the true meaning of consultation and collaboration. A bottom up approach is essential particularly with a diminishing public purse and the requirement to amalgamate funding pots from all sectors (BIDs alone have invested over £250m in to the British economy). The additional benefit of accountability amongst the stakeholder groups can also be achieved creating some would say a sense of belonging and pride in a community. Businesses become acrimonious when they are presented with a 'fait accompli' they are far more malleable when they are fully engaged and have their views respected even if the outcome isn't what they may have wished for the understanding is greater.

3. PROJECT COLLABORATION and FUNDING

Experience in Swansea suggests that joint funding by the BID, WG and LA can produce some excellent results. However, there are some practical issues which need addressing to free up this creative and innovative approach to local or regional problems and solutions.

1. A reduction in bureaucracy and more flexible funding deadlines would undoubtedly allow for the maximization of many more opportunities ..particularly with regard to budgets and departments. Projects with a more holistic nature often cut across departments which causes endless problems in terms of agreement, coordination and delivery. An economy built on Enterprise and innovation which in turn promotes 'vibrant and viable places' needs to respond far more quickly in order to maximize opportunities..the time lag is often much too great to maximize benefit and achieve necessary outcomes. A healthy mix of the private sector working with the public and third sectors can only promote greater understanding and entrepreneurial ways of working. Careful planning, monitoring and evaluation of outcomes in the long and short term is essential. It is possible that the Public sector needs to consider a change in culture which becomes more outcome driven than process driven, there sometimes appears to be much emphasis and time invested into the process but less emphasis on the outcome and action. Additionally, experience has taught the BID that often excellent projects in collaboration with the LA and third sector are thwarted because the political agenda (aims and objectives) may vary, possibly because we deal in different currencies, greater compromise and flexibility for the common good is often necessary.

4. National principles for regeneration

Swansea BID agrees wholeheartedly with the principles set out in general terms. However, we would argue that there has been for far too long an emphasis on place regeneration which is often piecemeal and lacking cohesion. The vision and the proposed outcomes for different regions need to be clear, achievable and sustainable built on each areas uniqueness and strengths. A 'one solution that fits all' will not achieve a sense of pride and conducive cultural sense or richness of the community that Wales has in abundance. For example from a purely business perspective the attempt UK wide to present all shoppers with the same style 'shopping centre's has in part spoil the uniqueness and appeal of town and city centre's,

5. Joined up Delivery.

Sustainable, effective regeneration at any level requires a cohesive and integrated approach whether it be the increase of the quantity and quality of the labour force or a commitment to improved housing. Each objective will naturally impact upon another, in numerous and far reaching ways. The difficulty will be in creating the environment which encourages this cohesion rather than the 'tribal behaviour' which results in barriers and short term gains. Governance mechanisms will be key to a practical solution for an integrated and cohesive approach. It will also be vital to prioritize the major regeneration objectives at a National, regional and local level as the objective of increasing the retail offer of a town or city centre and hence footfall could negatively impact on pollution and the environment. Our experiences in Swansea illustrate these tradeoffs which are inevitable, but can be managed with a clear set of priorities at regional and local level. Transparency and conviction for these objectives and their priority can only promote greater understanding within communities and the vision and goals for their area.

6. The New Delivery Framework

In principle the new delivery framework appears to set out a structured approach to regeneration on a national, regional and local basis. It's important to recognise that the local delivery of regeneration initiatives is vital as clearly there is greater understanding and knowledge at a local level. We would wish to see greater collaboration with the LA in terms of decisions at concept and planning stage in order to ensure the delivery of the most preferential outcome for our community, as well as an achievement of a greater majority understanding and striving for the agreed vision and goal. In order for this to work practically there needs to be an appreciation of each other's role in this process and a need to make these meetings and consultations a priority. once again it will be essential to identify the right representation around the table and have clear and agreed vision and outcomes.

Conclusion

Attention to detail in the organisation of this proposed structure for regeneration will be key to success, as will the clarity and understanding of the objectives and goals. People will only be engaged and empowered if given the tools and the opportunity to do so, this will undoubtedly require cultural change not only in working practices but in mind set to. With a well prepared level playing field who knows what the united force of people and place might achieve. As a final thought its vitally important to consider that some changes in terms of regeneration require twenty five years plus to fully realise their potential and it's a mistake to change course part way through...for example it might be a mistake to change the Regeneration Areas when the work is only part done. We hope our thoughts, views and experiences provide some useful food for thought. Finally, we are happy to discuss our ideas and provide further support should you require it.

77. National Museum Wales

Amgueddfa Cymru – National Museum Wales' response to the Welsh Government consultation document on Vibrant and Viable Places – new regeneration framework

Amgueddfa Cymru – National Museum Wales welcomes the opportunity to respond to the consultation on the Welsh Government's new regeneration framework 'Vibrant and Viable places' which encompasses a range of integrated activities to reverse economic, social and physical decline in order to achieve lasting improvement. We support the document as a whole and particularly the vision that everybody in Wales should live in a vibrant, viable and sustainable community with a strong local economy.

Background on Amgueddfa Cymru

Amgueddfa Cymru – National Museum Wales was established by Royal Charter in 1907. The Museum receives its core funding through grant-in-aid from the Welsh Government as a Welsh Government Sponsored Body. Amgueddfa Cymru's Charter objective is 'the advancement of the education of the public' involving developing, caring for, studying and sustaining access to Wales's national museum collections for the benefit of society in perpetuity.

Amgueddfa Cymru's Vision, published following significant internal and external discussion and consultation, is to be 'a world class museum of learning'.

Amgueddfa Cymru – National Museum Wales operates seven national museums across Wales: National Museum Cardiff, St Fagans: National History Museum, National Roman Legion Museum, Caerleon, Big Pit: National Coal Museum, Blaenafon, National Wool Museum, Dre-fach Felindre, National Slate Museum, Llanberis and National Waterfront Museum, Swansea.

The role of Culture, heritage and museums in regeneration

Culture, heritage and museums, in particular, have a specific and strong role to play in supporting regeneration through partnership and collaborative work at local, regional and national levels. We support the assertion that partnership is critical in regeneration and especially in the current unprecedented economic conditions. Well-managed historic and natural environments contribute to the distinctive character of Wales' landscape and towns with heritage conserved (Outcome 1) but further to this, the sector works across a wide range of partnerships to build learning communities, contributes to a skilled and confident existing and future workforce, supports the development of a high aspiration local culture and engagement with school, post 16 and adult learning opportunities (Outcome 2). It can also underpin healthier communities (Outcome 3) through the nurture of positive and cohesive local identities, well-being and community cohesion. Overall, museums and galleries have a role to play in supporting the development of sustainable and resilient communities and to a sense of place and social cohesion.

Amgueddfa Cymru and regeneration

Amgueddfa Cymru, through partnership and collaboration with a wide range of organisations and bodies, is a strong contributor to, and supporter of, regeneration across Wales at local, regional and national levels.

An integrated approach to heritage tourism

Amgueddfa Cymru is a member of the Welsh Government's Cultural Tourism Partnership and at each of the seven national museums we work in collaboration with regional and local tourism partnerships. For example, we are members of the North Wales Tourism Partnership and the Padarn Forum and as such are part of the integrated approach to heritage tourism across Gwynedd, Conwy and Snowdonia National Park, through a £1.7m European-funded project. In addition, we work closely with Gwynedd County Council to support the on-going relationship with the slate heritage partnership.

Following a successful bid to the Heritage Lottery Fund (HLF) and supported by the Welsh Government, Amgueddfa Cymru is beginning work on an exciting £25.5m development at St Fagans: National History Museum, which is Wales' most popular national museum site, and also recently voted top UK Visitor Attraction by 'Which?'. St Fagans has always been a museum about the people of Wales. The current developments will enable visitors to the site to engage in an innovative and participatory museum and to explore life in Wales from the earliest humans up to today – a 230,000 year old story.

Visitors will be able to: discuss and debate how, when and why Wales

became a nation, discover the details of people's day to day lives through the ages, and celebrate and discover the creative skills of generations of craftspeople. Furthermore, Wales' National History Museum will act as a key gateway to the heritage of Wales, integrating heritage tourism at local, regional and national levels.

Visiting museums contributes to social well-being

Amgueddfa Cymru continues to implement, support and promote the Welsh Government's commitment to free entry to all of the seven national museum sites. Since 2001, when the Welsh Government enabled Amgueddfa Cymru to make entry free to all of our sites, the Museum's visitor figures have increased significantly. Free entry was introduced to enable everyone to enjoy the nation's rich heritage of arts, sciences and social and industrial history and the policy continues to be a remarkable success. Back in 2000/01, the last year in which a charge was made for admission, there were 764,599 visits to National Museum sites per year. The introduction of free entry resulted in a substantial increase in visitor figures to 1,430,428 (+ 87.8%) in 2001-02. The momentum has been maintained and during 2011/12, there were 1,690,340 visits to the seven national museum sites in Wales, the highest ever number of visits on record. A wide range of groups of people participate in Amgueddfa Cymru's arts and cultural activities, e.g. school children and students (we are the largest provider of learning outside the classroom in Wales with over 248,000 visits from the formal education sector in 2011/2012), young people and families, as well as adults of all ages. Amgueddfa Cymru has spent a lot of time and energy on ensuring that its communications and marketing plans are based on the formulation and implementation of effective Audience Development Action Plans at each of the seven individual museums. Striking the right balance between meeting the needs and expectations of existing loyal visitors and attracting new, harder to reach audiences has been critical both in terms of increasing the volume and also, within that total, increasing the number of visitors from the C2, D and E socio-economic groups. In 2000-01 fewer than 250,000 of visits were made by people from these groups. Over the years, the figure has increased to over 500,000 – one in every three visits. Amgueddfa Cymru is undertaking a major visitor survey during 2012 to increase understanding of its visitor profile and to inform its strategy for further widening access to Wales' national museums. We are proud of the fact that, year on year, more people in Wales are able to access the national collections. During the economic downturn we have still achieved increases in visitors to our museums illustrating that free entry is a policy which actively contributes to social well-being at a time when people are under financial and emotional stress.

A sense of place

The National Waterfront Museum, Swansea, Big Pit: National Coal Museum, Blaenafon, National Roman Legion Museum, Caerleon and National Slate Museum Llanberis, all play an important role in sustaining their local towns and communities. The creation of the National Waterfront Museum in Swansea, for example was a key component of the regeneration of the Swansea maritime area. The National Wool Museum in Drefach Felindre has a specific role to play in community cohesion at the heart of a rural community in Carmarthenshire.

The national collections in a local context

To enable wider engagement with our collections by individuals who live at a distance from our sites, we are working closely with CyMAL (Welsh Government) and the Heritage Lottery Fund (HLF) in implementing a new and revised version of the highly successful and well-established Cyfoeth Cymru Cyfan – Sharing Treasures scheme. Sharing Treasures allows local museums to create exhibitions relevant to their local/regional context using items on loan from the national collections and through sharing expertise. Through being a lead partner on the hugely significant 'Peoples Collection Wales' initiative, and through the development of our own Rhagor website as an 'on-line collections resource', and our own Amgueddfa Cymru website, we have expanded our audience reach, opened new avenues for developing areas of activity and created new sources of cultural value. In addition, we have a large number of research-standard collections online opening up access to some of the 5 million objects in the national collections.

We support the strong links between regeneration and tackling poverty

Amgueddfa Cymru – National Museum Wales has always been about transforming children's futures by enabling them to experience life in the past and present. For many years it has had a commitment to creating pathways through which the children of Wales can participate in cultural activities and enrichment. Over the past decade, Amgueddfa Cymru has worked with partners supporting children and families in poverty to pilot projects that open up pathways and enable them to engage with culture in a positive and affirming way. 'Transforming Children's Futures...' is our strategy for building on these projects and partnerships over the next three years and into the long term. We recognise that working in partnership with organizations 'on the ground' is essential if we are to forge the pathways that enable children, young people and their families living in low-income households to participate in their national museum.

We give regard to the UNCRC as the basis our work with children and young people, in line with the Rights Measure, across the organisation and it underpins 'Transforming Children's Futures...'. We work closely with the Children's Commissioner who was a keynote speaker, alongside the Minister for Housing, Regeneration and Heritage at a conference on the role of the cultural sector in tackling child poverty organised and hosted by Amgueddfa Cymru, with the support of the Welsh Government. The Children's Commissioner has also supported the development of a 'Kids in Museums' day being developed by the Welsh Government.

The Museum works with children and young people in Communities First areas in a variety of creative ways including, for example, an art learning project (the Start Project) for pupils in Cardiff primary schools and their families who have previously had little or no contact with the Museum. The 'Schools Communities Agenda 21 Network' (SCAN) project works directly with schools across the nation, including schools in Communities First areas, giving pupils experience in identifying local animals and growing plants while contributing data to studies being undertaken at the Museum.

Through the 'Bling' project, displays at museums showcase the lively and vibrant work produced by young people, all with a completely different take on the 'Bling' theme. Funded by the Welsh Government's Communities First Outcomes Fund the project has innovatively combined the arts, museums and the Communities First vision framework to provide new opportunities for

young people, including accreditation through the ASDAN Activities Award. The project has looked at how precious metal, treasure and decoration is used to express taste, image and personal status. Each group has worked with an artist to create their own Bling – this could be anything from a simple ring to complex giant necklaces or music videos and graffiti art. Each young person has made a statement about their own background, lifestyle or aspirations through producing their own piece of Bling. The project has encouraged creativity, developed an interest in learning, raised achievement and stimulated imagination.

Building on the success of the 'Bling' project, Amgueddfa Cymru is in setting up Youth Forums around its national museum sites to enable young people to contribute significantly to the design and delivery of community focused programmes.

Supporting education and skills

Amgueddfa Cymru continues to support the increase in apprenticeship opportunities through work in respect of traditional building craft skills, heritage horticultural skills and mining apprenticeships. For example, Amgueddfa Cymru is part of a group of associated garden sites across Wales that runs the Heritage Horticulture Skills Scheme (HHSS). This scheme has been awarded a grant by the Heritage Lottery Fund under the Skills for the Future programme to provide traineeships in practical, specialised, heritage horticultural period techniques. The scheme will operate for 4 years and aims to increase the number of highly skilled gardeners available to the heritage horticultural sector in Wales (and the UK).

Amgueddfa Cymru works with further and higher education institutions to support the training of student teachers and provides a range of opportunities for continuing professional development of qualified teachers. Recently, Amgueddfa Cymru worked with Cardiff Metropolitan University to enable student teachers to undertake project work and practice around the exhibition on the illustrator and author Anthony Browne 'Through the magic mirror....' which was targeted at young children and families.

Amgueddfa Cymru is continuing to promote its flagship Welsh for Adults learning resources. The comprehensive packs which contain materials for tutors and students of all levels, have been produced in conjunction with the Welsh Government's Department for Education and Skills for use at St Fagans: National History Museum, National Slate Museum, Big Pit: National Coal Museum and National Wool Museum. The resources create a framework for learners of Welsh to develop confidence and skills outside the classroom, and offer tutors a fresh way to encourage the use of language skills in everyday life. We also offer a variety of provision for Welsh learners, including lessons for staff, initiatives for very small children and adults at the National Slate Museum and National Waterfront Museum.

In response to specific questions:

1. What is your feedback on lessons learnt from delivery to date?
Amgueddfa Cymru's experience to date demonstrates the importance of tailoring delivery to the local needs and requirements.
2. Should other national outcomes or principles be considered?
We support the national outcomes and principles as they are set out.

3. What more can be done to achieve greater coherence and cross-cutting action across departments?
Even more partnership and collaboration are essential if this new regeneration framework is to achieve meaningful and lasting results. It is important that the new framework complements and works synergistically across the Programme for Government.
4. Do you agree with the national, regional and local approach set out?
The national, regional and local approach set out reflects the way in which Amgueddfa Cymru delivers its programmes and we believe that this is an appropriate model for taking regeneration forward.
5. Do you have any comments on our proposals for how we will target and direct our funding?
It would be helpful to have a range of funding strands that organisations in partnership could apply for and which deliver on at least one of the national outcomes. This should include provision for projects that push boundaries and an environment in which some projects are 'safe-to-fail' but there should also be mechanisms within the funding streams for then rolling out the most successful pilots. Targeting of resources is really important so that they reach the point at which they make the most difference.
6. We want to ensure effective monitoring and evaluation of regeneration activities, will the approach set out achieve this?
We believe that the RBA approach will help to ensure effective monitoring and evaluation of regeneration activities. Through the people and place approach, evaluation of participation and 'listening to people' needs to take place. There is a need to reconcile this with the usual pattern of front-end, formative and summative evaluation. If we are to place people's needs at the heart of our work, we must develop more adaptive and participative ways of carrying out evaluation.

78. Owen Davies Hyder Consulting

Dear Sirs. The Vibrant and Viable Places is a thorough and informative document and certainly sets out a much clearer vision for regeneration in Wales than has been published in the past. Whilst broadly in support of its contents the following comments are meant to add emphasis or highlight further examples of where it is felt good and best practice can be identified.

Please make contact if there are any items of information you feel I can provide to add emphasis to the following comments.

Section 3 Context

Feedback on lessons learnt – The work of the Social Housing sector in Wales as local regeneration and enterprise bodies should not be overlooked as a key driver of transforming the lives of both people and places. The work of RCT

Homes, a stock transfer RSL with 10,000 homes located across RCT CBC provides good evidence of an enterprising and regenerating social landlord. Hyder has been working with RCT Homes for over 2 years to deliver its environmental programme, a £10m in the environmental renewal of its neighbourhoods, the approach has won an award from the RTPI for its innovation and engagement with communities and the manner in which it addresses the atmosphere, landscape and horizons of a neighbourhood. Further details can be provide if required.

Section 6 New Regeneration Framework

Whilst the strategy recognises that the economy is not bound by local authority boundaries (6.2.ii) and challenges cannot be addressed in isolation, the regional approach does not make reference to the importance of cross boundary collaboration between England and Wales. This is particularly import to the economy of border counties and to greater or lesser extent major conurbations and cities within England have more of an influence on their economies and regeneration than do programmes in Wales. The need for greater cross border collaboration requires further discussion and articulation in strategic and political terms.

The creation of three regional collaborative areas is supported but needs to be matched by a root and branch review of existing local and regional partnerships and boards. The potential for merger and rationalisation of existing structures should be explored. There is a risk that Council Officers and staff of the Homes and Places Division could become swamped my servicing and supporting these groups as opposed to the delivery of programmes.

6.3.iii – recommend examining RCT Homes/Hyder Consulting’s Atmosphere Landscape and Horizons people and place baseline and evaluation model for neighbourhood renewal which achieved recognition from the RTPI Cymru in 2011.

6.5.i – Local Growth Zones as presently reported for Powys do not provide sufficient detail to explain the mechanisms or programmes the LGZ offer beyond those that already exist, compared to BIDs and other interventions such as Enterprise Zones. Further guidance on the regenerating role and mechanisms would be welcomed.

6.5.ii.7 – Recommend add emphasis to the multi million pound investment in environmental renewal of RSL’s such as RCT Homes, Tai Calon as part of their WHQS commitments.

6.6.i – Models such as the measurement of the Social Return On Investment (SROI) could be recommended and Hyder have undertaken element of this approach for Powys CC for funding applications for Ystradgynlais and the Upper Swansea Valley located in the Western Valleys.

OWEN DAVIES

Technical Director | Planning & Neighbourhoods | Hyder Consulting

79. National Day Nurseries Association

1. What is your feedback on lessons learnt from delivery to date?

(Relates from Q1 to Q3.4)

It is evident from the lessons learnt to date that there is a need to integrate early years and childcare provision to regeneration plans to support the Welsh Government's three key messages from the Welsh Government's policy review of approaches to regeneration:

- o Strengthened governance is needed to improve delivery. In particular, there is an opportunity to drive regional collaboration in a more structured way, including effective spatial planning for regeneration

- o Partnership is critical. Sustainable regeneration can only be delivered through genuine engagement with communities, local authorities and other public sector organisations, the third sector and the private sector.

- o The Regeneration Areas approach is transforming some of our most disadvantaged places, but there are still opportunities to improve the way we invest at local level.

Access to childcare is an important factor in achieving long-term change in all communities including deprived areas, as well as offering a practical resource in the near term. Early years care and education gives parents the support they need so they can devote time to paid employment or training that will enable them to re-enter the labour market and balance this with their family responsibilities. Evidence shows high quality early years provision gives young children 'a flying start in life'. NDNA Cymru recognises that the Welsh Government includes the links to the Flying Start programme. This contribution to childcare provision breaks intergenerational cycles of poverty, low ambition and welfare dependency.. In addition NDNA Cymru believes that all early years and childcare provision has an impact on the regeneration of communities.

Day nurseries offer an excellent resource to local authorities and regeneration partners through which family support, child welfare and employment solutions are also channelled. As such, there is much to be gained from fully harnessing private, voluntary and independent (PVI) childcare provision to the economic, social and educational aims of cross-governmental, multi-agency regeneration initiatives.

This in turn would be further demonstration of the partnership between the public, private and voluntary sectors which is a constant theme in the proposals for a new regeneration framework - a cornerstone of any strategy to secure investment, grow capabilities, boost employment and raise economic performance. Local authorities are familiar with commissioning and partnership working on early years and childcare from the expansion of the Flying Start programme and the requirements of the Childcare Act 2006, along with the other programmes by the Welsh Government including the delivery and management of the Foundation Phase. Partnership working is key to the delivery of all these programmes.

Given the accepted benefits that young children gain from experience of quality early years care and education, childcare also offers an example of a scheme that links economic and social outcomes in the way the government hopes to achieve through effective regeneration schemes. Fully utilising the private, voluntary and independent (PVI) childcare settings already in deprived areas, and working with local authorities on ways to attract sustainable

investment, as well as consolidating the sustainability of provision, should be an important factor for consideration in any regeneration initiative.

2. Should other national outcomes or principles be considered? (Relates from Q4 to Q 4.3iii)

NDNA Cymru believes that the following programmes should also be considered:

- o Welsh Government's Policy Statement Guidance document no: 046/2011 Nurturing Children, Supporting Families policy priorities for childcare.
- o Welsh Government's Families First programme guidance.
- o A living language: a language for living Welsh Language Strategy 2012-17.

3. What more can be done to achieve greater coherence and cross cutting action across departments? (Relates from Q5 to Q6.1.V)

To support the key principles of Partnership, Strategy and Sustainability for regeneration which the Welsh Government plans to operate; NDNA Cymru believes that the following departments within the Welsh Government should be included to ensure that childcare is also integrated in the partnership approaches to regeneration:

- o the Childcare and Play Policy Team of the Children, Young People and Families Division in the Department for Health, Social Services and Children;
- o the Department for Education and Skills NDNA Cymru is a key strategic partner of these Welsh Government departments supporting the delivery of high quality, affordable, accessible childcare throughout Wales.

4. Do you agree with the national, regional and local approach set out? (Relates from Q6.2 to Q6.2iii)

Yes

5. Do you have any comments on our proposals for how we will target and direct our funding? (Relates from Q6.3 to 6.5.i)

NDNA Cymru would like the planned regional regeneration boards to have consideration with regards to targeting and directing funding for the long term sustainability of childcare provision in all communities throughout Wales including both deprived and rural communities. As mentioned previously quality, affordable, accessible childcare provision is key to the regeneration of communities. Therefore supporting the sustainability of childcare provision needs to be a key priority for targeting funding to support the new Welsh Government regeneration framework.

6. We want to ensure effective monitoring and evaluation of regeneration activities, will the approach set out to achieve this? Relates from Q6.6 to Q6.6.i)

NDNA Cymru believes that a results based accountability approach will achieve the monitoring and evaluation required for the new regeneration framework.

80. Valleys Regional Park

Context to this response

This response has been drawn up by the Valleys Regional Park (VRP) coordinator based out of Groundwork Wales. It is not an official response from Groundwork Wales and does not represent the views of that organisation. It is intended to be representative of the Valleys Regional Park partnership based on discussions with members of organisations that comprise the partnership and experiences of working with those organisations. However, it does not represent the corporate views of those individual organisations.

Valleys Regional Park

The aim of the Valleys Regional Park partnership is to maximise the economic, social, and environmental potential of the valleys outstanding natural and cultural assets, which consequently forms the basis and the focus of our comments in this response. It is crucial that we take advantage of those assets and protect them for sustainable economic and social development. However, we are very mindful that this is one extremely vital part of a much-needed holistic approach and so have commented and made suggestions outside this focus to ensure that it complements the wider context of regeneration activities.

In addition, the comments in this response are understandably related to a valleys context as a result of the VRP partnership experience, but hopefully many of the suggestions and observations will be applicable to the wider Wales context where appropriate.

General Points

The review and consultation is highly welcome. Whilst the current economic climate is certainly producing highly undesirable and very difficult challenges, we must also view it as an opportunity to reassess our approaches to regeneration and the consultation document and the work undertaken to produce it must be commended in that it seems to have grasped that. The document is a high-level statement of intent that appears to be well-considered and purposeful. The details of how these will be achieved to bring about lasting change will be vital.

Regeneration is not just about addressing the issues that unfortunately continue to blight economic growth in our most deprived communities but importantly about creating a new inclusive future and vision for our people and places.

Some of the key points highlighted or suggested in this response are:

- The commitment to a cross-cutting partnership with purpose approach (top down and bottom up involving all sectors) is vital
- There is a need to invest in and maximise the economic and social potential of our natural and cultural heritage assets
- A radical Green Infrastructure strategy is required which will be attractive and provide a high quality of life for our communities, address fuel poverty, mitigate against support healthy lifestyles, act as a powerful multifunctional driver for sustainable economic growth, and mitigate against the effects of climate change
- Improved Housing for all our communities is vital and there is need to ensure that the immediate physical environment is included in that. In

the valleys we would like to see a commitment to ensure that all social housing estates are developed on the best principles of eco-housing, which is proving successful elsewhere worldwide

- Improved procurement is vital in order to ensure better local benefits
- Vibrant town centres are absolutely vital – rather than simply physical regeneration of the public realm, a holistic settlements approach is a necessity enhancing the town centres by connecting them to communities and the surrounding natural and cultural heritage assets, which will enhance their attractiveness, and create a more sustainable diverse offer to attract people to visit and utilise them.
- We need to ensure we are the vanguard of a greener, knowledge-based and innovation-driven sustainable economy. The private and academic sectors have vital roles to play
- Connectivity should be a key theme with high speed broadband, efficient integrated transport and connectivity between town centres and the wider settlements and environment.
- City Regions must utilise the assets of all their constituent areas and recognise and maximise the polycentric nature of the valleys and other areas.

Specific comments on Sections and Responses to Key Questions asked Section 3: What has changed and where are we now?

Comments:

▪ Recent Welsh Government Practice

Programmes such as Communities First and RDP have in some cases made real differences in some of our deprived communities. To ensure this continues, local partnerships need strong support to ensure they link effectively with strategic objectives and initiatives without losing their local focus and delivery – the correct balance is crucial. The new clusters approach with CF should help in this respect. Some of our dealings with RDP have shown it can be fragmented and operates in isolation of (other) strategic or regional programmes or initiatives, which can dilute its effectiveness. The Welsh Government's commitment to Sustainable Development is highly welcome and vital. Sustainable Development is not an option but a necessity and there can be no perceived balance between economic growth and sustainable development – all economic growth must be based on sustainable principles. Sustainable development can and must be used to stimulate green growth and a low carbon economy which can act as a powerful economic driver as well as mitigating against the effects of climate change and helping to address inequalities in health.

▪ Emerging Welsh Government Programmes

The development of enterprise zones is welcomed and should be supported. These must be genuinely innovative and involve the academic sector where and as appropriate with long term commitment. Disappointingly, the proposed Low Carbon Initiative in the HoV regeneration area appears never to have been developed despite much promise – Aberdare was proposed as Wales' First Low Carbon town, but what happened? We need to be in the vanguard of this approach in keeping with and supported by the new Science Strategy for Wales. It is highly encouraging to see that there is recognition of this

within emerging programmes such as ‘Sustaining a Living Wales’ and the approach to the new round of Structural Funds with an emphasis on a greener, and knowledge and innovation-based economy. With regard to the proposed City Region approach, specifically those in the south which will include the valleys, each of those city regions must recognise the polycentric nature of the valleys, certainly in the south-east. Moreover, the relationship between the constituent parts of the city regions must be one that reflects their differing assets and roles. It will be important to clarify how the role of the proposed Shadow Regeneration Boards will fit with the proposed City Regions, the report for which has proposed a city region strategic planning tier.

1. What is your feedback on lessons learnt from delivery to date?

Perceived strengths (p8)

Some excellent examples of regeneration to date and we need to build on those and the lessons learned.

Partnership is key as is transparency with regard to the shared visions and goals. Within Valleys Regional Park, partners have bought into a collective vision. Visions and goals need to be clearly communicated and articulated such that partners fully understand their roles and are committed to that achieving those goals. Importantly, it is not all about funding – we have experienced in some cases that partners’ commitment can wane if funding is not available. The vision and goals also need to be communicated to the wider general public to create understanding and support. Clear effective leadership is required in order to do this.

Perceived Limitations (p9)

The fact that these have been recognised is refreshingly honest.

Some comments on those listed:

Rigid boundaries... – Whilst it is understandable that certain geographical areas are in greater need of funding, flexibility to include adjacent areas that reflect the connectivity and economies of places would be welcome.

Timing of funding... This is correct. In addition the need to complete expenditure and delivery within financial years can be constraining and counterproductive.

Insufficient involvement of the private sector... – agree. In addition, the third sector could be effectively involved, but there has to be a realisation that they need to be focused.

Additional observations:

In some cases, we have experienced that delivery of projects has sometimes been hindered by being too process-driven rather than focusing on delivering outcomes. This applies to government and also to WEFO. There is a need to be flexible and innovative and officers involved need to be mindful of that.

Sometimes the expected delivery time for outcomes is too short. In some cases certainly in areas of the valleys, we are trying to address over eighty years of economic and social decline – we cannot expect last-lasting outcomes to be obtained within inappropriately short time scales. Long-term commitment is required in order to see fruition.

Section 4: Our Vision and Outcomes for Regeneration

Comments:

The definition of regeneration appears well-considered. A holistic approach is vital as often there has been an emphasis on physical regeneration alone, which has failed to remedy the issues.

The phrase 'Lasting improvement' is somewhat vague - whilst it is clear that lasting means sustainable, improvement provides no clear measure, or indeed intent, of the extent of the change required or desired.

As stated, changes in economic circumstances has meant that many of the underperforming places have lost their original *raison d'être*. This is particular true of many settlements and communities in the valleys whose existence was based on unsustainable heavy industry. There is a need to ensure there is a vision for a clear well-founded and carefully considered multifactorial *raison d'être* for their future sustainability, which should form the basis for targeted interventions in those places, maximising the potential of their assets and addressing weaknesses.

A suggested amendment to the Vision (4.2) is:

"Everybody in Wales should live in well-connected vibrant, viable and sustainable communities with a strong local economy and good quality of life." Connectivity is vital in all aspects – people connected to people through strong communities, excellent integrated transport links, IT (fast broadband) connections, connected to their heritage and connected to their environment such that they sustain and nurture it to support them.

Quality of Life is paramount and should be articulated in the vision.

2. Should other national outcomes or principles be considered?

In general, the three national outcomes aligned to the Communities First programme and Welsh Government's Programme for Government objectives are welcomed since, certainly in the case of the valleys, they highlight the major issues that need to be addressed in order to revitalise the valleys, namely poor economic performance, lack of education attainment and poor skills, and health inequalities.

▪ Prosperous Communities

"Sustainable use of the natural environment to establish local energy and food production"

"A well-managed historic and natural environment contributing to the distinctive character of Wales' landscape and towns with heritage conserved."

These statements regarding the environment could be greatly strengthened by recognising and emphasising the need to maximise the economic and social potential of the natural and cultural heritage assets to act as an important and vital economic (and social) driver. The peri-urban nature of the settlements in the valleys means that the natural environment provides a great asset (as indeed is the coast in the seaside towns).

The environment can provide much more than local energy and food but can be utilised sustainably - needs to be used as a driver for economically prosperous communities through other products, skills development and job creation. We are currently working in an Interreg project WECAN (Working together for Economically-prosperous communities through Assets of Natural Heritage), which is addressing these issues.

The environment needs to be more than just well-managed, and a fully-developed Green Infrastructure plan for Wales is as vital as the 'grey' infrastructure plan. This is poorly reflected in the current WIIP and the

outcomes here do not adequately indicate or acknowledge the potential of the natural environment to be an economic driver.

A well-sustained high-quality accessible natural environment can provide be attractive to businesses and skilled workers and act as a significant factor in encouraging investment. Successful town centres are vital and this can be achieved in part by ensuring they are well connected to the natural environment, which diversifies the reason for people to visit and spend time in those settlements.

Many cities and city regions such as Manchester and Leeds in the UK, Copenhagen and Stuttgart in Europe, and Vancouver and Buffalo in North America have realised the key role for green infrastructure in their sustainable economic development.

The Manchester City Region is proposing to release a new Green Infrastructure strategy this year and has developed a radical plan for sustainable economic growth based on its green infrastructure (Prosperity for All: The Greater Manchester Strategy). 'By 2020, the Manchester city region will have pioneered a new model for sustainable economic growth based around a more connected, talented and greener city region where the prosperity secured is enjoyed by the many and not the few... A healthy natural environment is a pre-requisite of growth; the social benefits (improved health and well-being) and economic benefits that high-environmental quality brings are well-documented. A strategy for growth therefore requires a positive plan for green infrastructure.'

The strategy also appreciates the detrimental effects that climate change could have on its economic development and highlights this an opportunity for development: 'The "Mini-Stern" for Manchester identified that the impact of unavoidable climate change on the Greater Manchester economy could be profound, with a potential loss of £20 billion to the economy to 2020 if it fails to adapt. However, there is a significant economic opportunity for the sub region if it takes early action'

<http://www.manchesterclimate.com>

http://www.agma.gov.uk/cms_media/files/climatechangeadaptation.pdf?static=1

The Leeds City Region similarly recognises the opportunity for green growth: "With over 90,000 green jobs and growing, providing solutions to environmental management is big business here"

<http://www.leedscityregion.gov.uk/our-work/green/>

Amongst the other reports that highlight the opportunities for green growth to stimulate and support sustainable economic growth are:

Copenhagen:

<http://www.forbes.com/sites/justingerdes/2012/10/30/copenhagen-shows-how-cities-can-become-a-cleantech-leader/>

Buffalo:

http://metrostudies.berkeley.edu/pubs/proceedings/Shrinking/18Schilling_PA_final.pdf

We agree that heritage can act as an economic driver and the development and promotion of the Valleys unique heritage is vital in boosting tourism as well as contributing to the distinctive nature of its settlements as stated.

- Learning Communities

The urban and natural environment and heritage can and must be used for learning opportunities and skills development. In the case of the valleys, unfortunately it has largely been forgotten that the area was at the cutting edge of technology and in the vanguard of the development of the modern world. The Valleys Discovery Festival has recognised that and we need to ensure that valleys communities (especially youngsters) have a greater understanding of that in order to help develop a high aspiration local culture.

- Healthy Communities

A well-managed, accessible natural environment that is well utilised by communities can contribute greatly to addressing and preventing physical and mental health inequalities and underpin wellbeing in our communities. There is a need to ensure that LHBs and the NHS are fully involved with regeneration initiatives, logistically and financially, to realise this potential.

Section 5: Our Principles for Regeneration

Comments:

3.2 Recent Welsh Government Practice

- Partnership

We agree that partnership is absolutely vital as stated earlier and well-articulated good communications are crucial.

- Strategy

People and Place approach: This is vital and very welcome.

Spatial Planning: It is good to see that good spatial planning will be a vital component to provide clarity with regard to planning and investment. The planning approach of the South Wales Outline Plan of the late 1940s on which much of the subsequent infrastructure development of the valleys has been based failed to resolve many of the intractable economic and social problems, certainly in the Heads of the Valleys region. There must be clear plans for all settlements and those that are not hubs for investment must have clear strategies for their future. We must ensure that planning provides for good connectivity and integrated transport to address this.

Leverage: There should be recognition that in some of our most deprived communities, it can sometimes be difficult to get additional financial leverage through private sector investment; differential intervention rates should be considered where EU and related funding is concerned.

- Sustainability

Bottom up and top down approaches: The need for both bottom up and top down approaches is critical for sustainability and local delivery – as stated previously the balance is vital and community-based approaches must be supported in linking effectively with strategic policies and planning. The statement on page 16 regarding engaging the third sector at the right level and right is important – hopefully this means that bottom up approaches will be involved appropriately and not be tokenistic as can sometimes happen. The detail of the plans from the proposed Regional Regeneration Boards will be crucial here.

The principle that there is a need to move away from being driven by political drivers and influence and short-term political horizons is very welcome indeed. Many of the problems have in some cases, especially in the areas of the valleys, appeared to be intractable and refractory to intervention for many

years. Long term radical commitment eradicating barriers and crossing boundaries is needed to address these satisfactorily.

Section 6: Our New Regeneration Framework

Comments:

- Joined up delivery

This is vital with all sectors involved.

The private sector is vital and needs to be better engaged at all levels and stages. Better and easier procurement to assist local business is critical in order for the local economy to benefit from investments in an area. Large companies must have strong enforceable social clauses in contracts secured to ensure maximum benefit locally through employment and skills development. Businesses should be encouraged to support local initiatives where they benefit from infrastructure contracts but this must also support their business relevantly.

The Third Sector is a key element for community involvement and a successful bottom-up approach. One recent observation however is that some third sector organisations in response to the diminishing support from the reduced public purse are seeking to diversify their activities, often into areas where they lack the required expertise. This is ostensibly understandable; however, it can detract from their key strengths and lead in some cases to duplication of effort where other organisations are better placed to deliver. A more coherent third sector approach is required with third sector bodies supported to work in partnership to provide the breadth of support and expertise needed.

The public sector role remains extremely important as indicated. Local authorities need to fully recognise that they must engage effectively with the other sectors to maximise the benefits of investments and interventions. Housing-led regeneration is imperative. Social housing schemes house many of the people that are most disadvantaged and in need of support and RSLs are well positioned to deliver that. A safe, secure home is essential as stated and effective energy efficiency can support health and reduce fuel poverty. Equally important is the physical environment in which those homes are situated. We would like to see a bold commitment and vision to ensuring that all housing estates in the valleys (and indeed Wales) are 'eco-estates' (the term itself is not one that needs to be used) which provide safe good, quality energy efficient homes within a high-quality immediate environment, whose potential is developed and maximised to support healthy living, skills development, and social cohesion. Recent reports from Steve Curry at V2C have shown the excellent work being done in Augustenborg in Malmö, Sweden:

<http://www.malmo.se/English/Sustainable-City-Development/Augustenborg-Eco-City.html>

In addition, these estates must be well connected to town centres to enhance the viability of settlements through excellent transport links (public transport, pedestrian and bikes). Excellent examples of connectivity planning in that respect include developments in Pontypool led by Torfaen CBC.

We need to explore the opportunities for schemes, such as Ty Unnos for social housing developments which will produce energy efficient homes together with the opportunities for creating associated local jobs.

Heritage (including arts and culture) can provide great opportunities to engage people successfully, especially youngsters, to engender pride and enhance aspiration as well as supporting economic development through enhanced tourism for example. Amongst excellent examples of this include Guardian and Ty Ebbw Fach along the Ebbw Fach Trail at Six Bells, Abertillery (supported by HoV and VRP). Whilst there are undoubtedly other priorities for investment, we must ensure that we work imaginatively to ensure support for heritage projects.

- Other Government Areas

BETS:

A high-quality IT infrastructure is vital to supporting business development. Business rates should be examined to see how these could be levied preferentially to support investment especially in struggling town centres. 'Meanwhile Uses' should also be encouraged in town centres where appropriate.

The links with the academic sector need to be strengthened and enhanced – a knowledge-based innovation driven economy is absolutely necessary. In particular, the natural environment in the valleys and Wales in a wider context can provide a great setting for the emphasis on research and innovation based on 'Low carbon, energy and environment' as detailed in the Science for Wales strategy published in 2012. As stated previously, the seemingly diminished activity and commitment in that respect in the HoV area has been disappointing.

Communities First. The programme and the new clusters must be supported appropriately especially with regard to ensuring links with strategic and regional policies in order for them to fully realise their role and potential in tackling poverty in our most disadvantaged communities. Whilst the environment is no longer a specific theme, nevertheless both the natural and cultural heritage can be successfully utilised to achieve the goals of prosperous, learning and healthy communities and indeed many of the most successful CF partnerships have done this.

Transport. In keeping with the themes of excellent connectivity, high-quality integrated transport is vital and the proposed Metro scheme further to electrification for the south Wales area should be fully supported. It must be wholly developed as envisaged to ensure that all communities as far as possible benefit from it. In addition, we could look imaginatively at using former rail tunnels to connect valleys east to west.

Education and skills. There needs to be recognition of the role that the natural and urban environment can play in education and skills development, especially vocational-type skills. The Forest Schools programme should be supported fully across the valleys and links between schools for learning with natural environment and their local heritage and culture are vitally important.

Environment is obviously at the heart of this response and so the specific comments here are brief. As stated a commitment to maximising the economic and social potential of the natural environment is viewed as vital with a coherent ambitious underpinning national (and regional) Green Infrastructure strategy. This is critical to future sustainable economic growth (quality of life, attractiveness to investors and businesses, green growth, producing energy, and mitigating against climate change) and helping to address health inequalities.

We need to examine novel instruments for funding that the environment might play - helping to reforest the valleys mountainsides with native trees and restoring the valleys uplands might play a major role in offsetting climate change and could also provide opportunities for investments through routes such as carbon trading. This could fit with the Woodlands for Wales strategy and provide an economic stimulus and should be explored.

Health. This has been a recurring theme to an extent in this response and the importance of the natural environment in helping to address health inequalities should not be underestimated. (see also p7 of this response)

A good example - <http://www.intelligenthealth.co.uk/>

Local Service Boards (with LHB involvement) and local planning must ensure there is an integrated approach to ensuring that the natural environment is supported and sustained to support health improvement. The NHS must be involved more extensively in prevention.

Community Wellbeing Coaches was an idea that was supported by HoV but it appears that the pilots were not extended – a new approach based on peer-to-peer encouragement and engagement would be very welcome.

Community benefits in procurement – absolutely vital and there is a need to make these easier and enforceable.

3. What more can be done to achieve greater coherence and cross cutting action across departments?

Better integrated working within national and local government portfolios and departments is the key to this together with greater transparency and communication. The Shadow Regional Regeneration Boards must comprise the correct individuals from appropriate organisations and departments who have the necessary sufficient authority to ensure that those organisations and departments adapt and work together as necessary. Experience gained in developing the VRP Partnership will be useful in developing the regeneration boards.

Partnership and cross-cutting action is vital but also requires clear effective leadership.

4. Do you agree with the national, regional and local approach set out?

Yes, the balance will be the crucial factor here to ensure effective delivery.

▪ Key Approaches for the Regeneration Framework

Evidence-based and the people and places approaches are correct.

The production of 'business plans' (p27) is welcomed with the following provisos:

- Mapping of existing funding should be extended to mapping of assets that can be maximised.
- The 'overarching vision for town centre(s)/seaside towns' appears too narrow and should be extended to ensure that wider settlements are the focus which ensures that the surrounding assets contribute holistically to revitalisation are included and that there is the required necessary connectivity between housing estates, the adjacent natural environment and town centres for example.

The composition of the partnerships will be absolutely vital.

With regard to place-based approach, there is a need in the valleys to explore those outstanding major areas of derelict land that have yet to be remediated

with a resourced and time-bound action plan drawn up to address and resolve this such that they are either returned successfully to nature or utilised otherwise.

With regard to town centres, small businesses should be encouraged to develop the opportunities for online marketing and retailing through collaborative website initiatives (we did this when I worked as a CF coordinator as a successful pilot for Abertillery - Abertillery.biz; unfortunately no additional resources were forthcoming to sustain it)

Again the need to connect town centres to natural and cultural assets should be developed in order to diversify the offer of our town centres. The VRP support for the improved connection of Aberdare town centre with Dare Valley Country Park through enhanced access has enhanced the 'offer' of Aberdare as a destination for visitors and locals, which should benefit the local economy)

- Investment

5. Do you have any comments on our proposals for how we will target and direct our funding?

Distinctive, achievable visions and goals are required for successful place making involving local communities as appropriate. Using an evidence based approach, funding should be targeted appropriately.

Good marketing, promotion and inclusive communications should be a part of the funding.

6. We want to ensure effective monitoring and evaluation of regeneration activities, will the approach set out achieve this?

Agreed evaluation needs to be embedded from the start with relevant and appropriate milestones and sufficient resources allocated towards it. However, this needs to avoid the dangers of short-term expectations.

81. Heritage Lottery Fund

The Welsh Government's consultation into a new regeneration framework: 'Vibrant and Viable Places'

The Heritage Lottery Fund's response

Section 3. 'Context – what has changed and where are we now? – What is your feedback on lessons learned from delivery to date?'

Housing Regeneration and Heritage. For information about Heritage Lottery Fund's (HLF) past investment in regeneration in Wales we refer you to our detailed response, the autumn 2011 Welsh Government Inquiry into the Regeneration of Town Centres. We stated that we had invested over £27m in 22 historic town centres in Wales through our Townscape Heritage Initiative (THI) programme. The programme funds a wide range of capital works and activities. Outcomes commonly include key buildings repaired, vacant floor spaces reused, improved public realm, jobs created/safeguarded, skills training and community initiatives.

The philosophy which underpins the THI programme is that investment in historic fabric will benefit the appearance of an area, helping to improve business confidence and the quality of life for people who live and work there. The idea is that this will inevitably lead to improved economic performance, and will initiate a cycle of new investment. Funding is focussed on work that allows historic buildings to be brought back into use and on external improvements such as replacing modern and characterless shop fronts, windows and doors. These are often simple measures but ones which can have a tremendous impact on revealing and restoring lost architectural details that help give a place its uniqueness – its identity.

HLF's THI programme provides funding for a THI Project Officer and administrative help. As noted below, the THI Officer role is key to the success of that town's THI project: they co-ordinate grant draw-downs from the various funders (who will have differing funding criteria and grant processes), as well as managing the work on the agreed list of works, and can act as a focal point in case of dispute.

Our most successful THIs in Wales and across the UK have a number of factors on common. They:

- Formed part of a larger vision for local and regional development.
- Programmed in forward planning to raise awareness of the heritage and secure buy-in from the local community and other stakeholders.
- Were located in close proximity to other conservation and regeneration schemes, where existing expertise and action helped provide a 'critical mass' for success.
- Provided a common thread that helped bring together different agencies in an area.
- Had an effective system and procedure for bringing property owners on board at an early stage.
- Were manned by suitably qualified, experienced, motivated and outgoing THI officers, who were able to build good relationships with property owners, regeneration and conservation agencies, the local community and other stakeholders.
- Ensured investment was focussed on a specific area making a clear visible difference, rather than being dispersed in a piecemeal fashion across a wider area.
- Drew on local conservation knowledge and experience, providing a pool of 'local champions' for the scheme.

Additionally, through our Heritage Grants programme we have supported the restoration of key buildings in town centres often as part of wider regeneration strategies. In towns such as Merthyr Tydfil and Cardigan, Heritage Grants have complemented THI projects through our support for the Merthyr Old Town Hall and Cardigan Castle redevelopment projects.

Merthyr Tydfil, as a local authority area, has received a total of £7.6m in HLF grants. The projects (Pontmorlais THI £1.5m, Old Town Hall £2m and Cyfarthfa Park £1.9m) bring a critical mass which will see a transformation of key heritage assets in the town centre and the main green space in the county

and will demonstrate to the public the value now being placed on heritage as a driver for regeneration.

We would also note the following points:

- The economic climate has changed in recent years for our applicants and grantees particularly the availability of partnership funding for our THI and larger Heritage Grants programmes. There appears to be a trend for applicants, including local authorities to request higher percentage grants as the availability of funding from other sources is reduced.
- The final 2013/14 deadline for EU Convergence funding has put pressure on a number of projects to programme in their capital works to fit the EU funding deadlines.
- In a number of instances, post-award reductions in partnership funding have led to projects being reshaped or reduced in scale to fit available resources.
- We are also seeing evidence that local authority restructuring is beginning to affect the long term management of a number of projects we have supported.

Section 4 'Our vision and outcomes from Regeneration – Should other national outcomes or principles be considered?'

Like many other organisations, HLF is an outcomes funder, and the HLF's outcomes (noted below) may be of help for the Welsh Government in its current deliberations. In HLF, we want the Lottery money we distribute across the UK to deliver long-term benefits. Our goal is to make a lasting difference to heritage, people and communities and we have identified outcomes that we would like to achieve with our funding:

Heritage outcomes

With our investment, heritage will be:

- better managed;
- in better condition;
- better interpreted and explained;
- identified / recorded.

Outcomes for individuals

With our investment, people will have:

- learnt about heritage;
- developed skills;
- changed their attitudes and / or behaviour;
- had an enjoyable experience;
- volunteered time.

Outcomes for communities / society

With our investment:

- environmental impacts will be reduced;
- more people and a wider range of people will have engaged with heritage;
- organisations will be more resilient;
- local economies will be boosted;
- local areas / communities will be a better place to live, work or visit.

In considering which projects to support we assess the broad range of benefits that projects aim to deliver. We have proportionate expectations for different levels of grant - the higher the sum of grant requested / awarded, we will expect to see a wider range of outcomes achieved.

Further information about HLF's outcomes can be found here:

http://www.hlf.org.uk/aboutus/whatwedo/Documents/HLFStrategicFramework_2013to2018.pdf

Geographic priority areas

As part of the HLF's strategic framework, the HLF Committee for Wales has identified four areas which will benefit from additional officer support, from Spring 2013. The four areas are:

- Bridgend;
- Conwy;
- Flintshire; and
- Newport.

These areas have been prioritised for development support as HLF has invested less funding in these areas than in other parts of Wales. There are a number of reasons why this is the case and in identifying the areas, HLF officers carried out significant research.

There is not a targeted, ring-fenced sum of money specifically available for the four areas. However, organisations from small, community-based groups to Local Authorities will benefit from additional advice and support from HLF Officers in planning projects and in understanding the outcomes HLF is seeking to achieve with Lottery funding.

Section 6 'Our new regeneration framework – What more can be done to achieve greater coherence and cross-cutting action across departments?'

Suggestion (1)

A significant barrier to success is the absence of a single point for funding information on the grants available from different arms of the Welsh Government (WG), and other major funders in Wales. Anecdotal information suggests that even within the WG, staff may not be fully aware of grants available in other departments, or who to contact for information. The current WG website can be somewhat difficult to navigate in this respect.

We suggest that a very simple way to achieve greater coherence across WG departments would be for the WG, in the first instance, to provide a single point of entry for all of its grant programmes. If successful, such a resource could be usefully extended to include information and links to funding streams provided by other funders, thereby developing into a publicly accessible Key Funders Portal on the WG website for the people of Wales. The Portal would be a single point of entry for those interested in grants from the different WG departments and major funding organisations in Wales such as WEFO, HLF and other lottery distributors. Visitors to the Portal would be able to search geographically for available grants in their area or by theme (regeneration, housing, conservation, etc) Basic grant information and contact details would be available with links to funders' websites for further details.

One helpful solution might be that this Key Funders Portal be developed in collaboration with the Wales Funders Forum and others, funded through the WG.

Suggestion (2)

HLF has received anecdotal feedback from a number of the schemes we have supported expressing a certain level of frustration about the lack of transparency in WEFO decision making. One helpful idea would be for WEFO to provide an annual online timetable of decision-dates, as other funders do, together with a summary of its funding criteria.

HLF previously responded to the Welsh Government consultation on the future of the Community Facilities and Activities Programme (CFAP) and we identified a number of projects which had benefitted from both HLF and CFAP funding. We agreed with the consultation proposal to allow applications to CFAP at any time rather than in rounds with fixed deadlines. However, feedback from some projects suggests that once applications have been submitted, decision-making timescales can be unclear which could lead to project delays. Great clarity on timescales was one helpful suggestion.

Suggestion (3)

Although funders work to different criteria, processes and timetables, it is possible for them to work together in areas of potential interest: HLF has worked closely with the BIG Lottery Fund in the delivery of the WG-supported Community Asset Transfer scheme. This has benefited HLF-funded projects such as Penarth Pavilion (HLF award of £1.6m), Cardigan Castle (HLF award of £4.7m), Newtown Market Hall (HLF award of £800k – see Appendix 1.)

Suggestion (4)

Strategic framework

HLF is pleased that the Welsh Government will continue to adopt a strategic and integrated approach to regeneration, recognising the significant contribution of Wales's rich and diverse heritage. Earlier this year, HLF launched its new strategic framework for 2013-2018, A Lasting Difference for Heritage and People

http://www.hlf.org.uk/aboutus/whatwedo/Documents/HLFStrategicFramework_2013to2018.pdf

It is a framework rather than a plan, and it sets the context and direction for HLF's investment, whilst ensuring we can respond quickly, flexibly and appropriately, should the need arise and should circumstances change. This will allow us to support locally-based projects as well as those based on wider strategies.

We will still offer support to the full breadth of heritage across the UK. Our targeted grant programmes for parks, landscapes, townscapes, places of worship and young people will continue as before, albeit in a more straightforward manner – making it easier to apply and simpler to administer. We have also put forward a range of new measures to help the heritage sector in these challenging times, many of which chime with the proposals set out in Vibrant and Viable Places. Start-up grants will be available to support changes in stewardship of heritage - helping communities take on the management of heritage assets and undertake initial options appraisals. Transition funding will help those previously supported by HLF to develop their business plans. A Catalyst capacity building grants programme will help organisations acquire the skills they need to fund raise and attract private investment and donations. A further round of HLF's Skills for the Future programme will build on the success of our first scheme, offering work-based training opportunities across the sector.

Heritage Enterprise

In its Strategic Framework 2013-18, HLF also reaffirmed its ongoing commitment to place-based regeneration through its Townscape Heritage programme. However, in recognition of the twin pressures of reduced public investment and ongoing challenging economic conditions, HLF will introduce a new grants programme from Spring 2013 to deliver regeneration at a micro as well as a macro scale. Called Heritage Enterprise, the new programme will offer grants of between £100,000 and £5 million to support the conservation and adaptation of an individual historic building or a coherent group of historic buildings for an end-use which actively contributes to sustainable development in areas experiencing economic disadvantage.

Heritage Enterprise is designed to complement rather than replace the Townscape Heritage programme, meaning we now have two grant schemes with a specific focus on regeneration. Its introduction will give us the flexibility to offer grant support where and how it is most needed. Under Heritage Enterprise, the key and common factor in all cases will be plans for a sustainable end-use, most likely involving the generation of a commercial income. In some cases we think projects could involve the re-localisation of production, through a re-engagement with industrial skills found within the heritage sector – similar to a growing number of projects we have already funded across the UK that involve the manufacture of pottery, textiles and paper. Other end uses are likely to involve the creation of business start-up units for cultural and creative small and medium sized enterprises (SMEs), widely acknowledged to be the likely future drivers of economic growth. While there are benefits to a strategic approach to regeneration at governmental level, we suggest that enough flexibility should be retained to respond positively and relatively quickly to local needs in a fragile economic climate.

Section 6 ‘Our new regeneration framework – key approaches for the regeneration framework. Do you have any proposals for how we will target and direct funding?’

Section 6.3.iii

Place-based Approach

Much has been written about the value of green space and that it forms an intrinsic part of the fabric of urban society without which our towns and cities would be much worse places to live.

Good quality green space can result in a wide range of benefits, including:

- Economic value.
- Physical and Mental Health Value.
- Benefits for Children and Young People.
- Social Cohesion.
- Sustainability and biodiversity.

HLF Investment in the quality of green space in the last decade has resulted in a Parks renaissance. More people are getting involved in Friends groups, satisfaction with greenspace has increased and expectations have been raised.

According to a recent evaluation of our Parks programme, it is anticipated that approximately 930 staff and 1,700 volunteers will receive training. 370 work placements will be established and 570 qualifications obtained. In addition to this, 2,500 third parties will also benefit from using the parks as a training

venue

http://www.hlf.org.uk/aboutus/howwework/Documents/ParksforPeople_Evaluation2011.pdf

Landscape Partnerships

According to a recent evaluation, the wider benefits of landscape partnership work go beyond the outputs and outcomes associated with the four aims of HLF's Landscape Partnership programme. Social and economic benefits to the partnership areas are not an explicit aim of the programme but are implied in all HLF funded work. Social and economic benefits for other HLF funded programmes have generally been assessed post-delivery by external consultants. The methodology employed has generally been to examine project spend and then to apply standard multipliers to estimate net local benefit. The Landscape Partnership programme has not to date been subject to any such analysis, and any significant estimate of the impact of landscape partnership expenditure would require a focused study.

One robust example of economic benefit is available from the Tweed Rivers Area Scheme in Scotland. Modelling suggests a one-off economic impact of £9.7m with an ongoing impact of approximately £3.6m per year, including over 300,000 additional visits annually across six key sites, supporting up to 90 FTE jobs as a result of HLF investment.

Further details here:

http://www.hlf.org.uk/aboutus/howwework/Documents/LandscapePartnerships_Summary2011.pdf

Section 6.3.iii

Historic characterisation

HLF welcomes the Welsh Government's commitment to follow a place-based approach to regeneration, informed by a thorough understanding of local distinctiveness and historic character. Wales possesses an outstanding asset in its unique, rich and valuable cultural heritage: its natural resources, the landscape, coastline and biodiversity, but particularly its historic assets, its buildings, towns and cities, gardens, industrial remains, archaeology, language and traditions. The historic environment makes a huge contribution to Wales's quality of life, its popularity as a place to live, work and visit, and, as a result, to the country's economic vitality. This unique sense of identity, this historic character, needs to be protected and nurtured, not eroded through insensitive development. Welsh towns should remain distinctly Welsh, its historic landscapes should not be blighted by a plague of insensitively designed 'tin-sheds', and the conservation of locally distinctive features should be a high priority.

The essential first step in protecting local historic character is to fully understand what makes each place unique and special. In this, Cadw has produced a series of excellent Urban Characterisation studies for a number of towns across Wales. From HLF's perspective, it is particularly helpful to have this kind of authoritative definition of the distinctiveness of an area or town: it helps us target our investment through the HLF's Townscape Heritage Initiative programme, and other grant programmes to make sure we are delivering the right kind of projects to the right places. It also helps provide

places with which people can identify, and which gives local communities a strong sense of attachment and civic pride.

It is particularly important to ensure these character studies capture the views of not just heritage experts, economists and urban planners, but also those of local residents, visitors and businesses to fully understand what people value about their local environment and how it should be looked after.

Working with Cadw and the Civic Trust for Wales, HLF has supported a pilot project to model community involvement in Urban Characterisation in Abergavenny, Rhiwbina, and Newtown.

Section 6.5.i.2

'Meanwhile' uses

HLF's research has demonstrated that it is particularly important for community-led regeneration initiatives to maintain momentum and support. Through Heritage Enterprise we will allow applicants to introduce 'meanwhile uses' in or adjacent to their historic building (such as cafés, shops or cultural venues) whilst they develop their main project. Through these uses, momentum will be created and maintained in a variety of imaginative ways, like, for example, the use of 'pop-up architecture' to provide low cost temporary structures or spaces within buildings that provide homes for new businesses for an interim period. Many of these new businesses could then transfer their operations into the refurbished building when completed. Such initiatives also provide visibility, encouraging people from the local community to get involved and to take an interest in the main project objectives. From a heritage perspective, this kind of innovative approach will help secure a viable and sustainable future for the conserved historic building. Therefore, HLF welcomes the Welsh Government's intention to provide capital investment for 'meanwhile' uses.

Appendix 1

	<p>Penarth Pavilion Restoration of the Grade II listed Pavilion located on Penarth Pier. HLF funding has helped Penarth Art & Crafts Ltd take on the lease for the Pavilion and undertake an extensive programme of repair and adaptation. The aim is to create a new cultural / community facility for the area, and thereby help regenerate Penarth's seafront.</p>
	<p>Cardigan Castle Cardigan Castle has iconic status in Wales. It is one of a handful of remaining stone castles constructed</p>



by Welsh princes and has associations with key figures in Welsh mediaeval history. In 1176 the Castle was the recorded location of the first Welsh Eisteddfod. HLF funding has helped the Cadwgan Building Preservation Trust to undertake conservation based repairs to the castle and its buildings, to restore its Regency gardens and to establish a sustainable mix of public heritage uses for the site.



Newtown Market Hall
The Grade II listed Market Hall lies in the centre of Newtown. Mid-Wales Food and Land Trust have been awarded HLF funding to take ownership of the site and restore the building. The aim is to produce a vibrant market for local producers and a hub for new business / social enterprises thereby helping to rejuvenate the centre of Newtown.

Heritage Lottery Fund
January 2013

82. WLGA

INTRODUCTION

1. The Welsh Local Government Association (WLGA) represents the 22 local authorities in Wales, and the three national park authorities and three fire and rescue authorities, are associate members.
2. It seeks to provide representation to local authorities within an emerging policy framework that satisfies the key priorities of our members and delivers a broad range of services that add value to Welsh Local Government and the communities they serve.
3. WLGA welcomes the opportunity to comment on the new Regeneration Framework and is pleased that the commissioned studies informing this consultation document have also been published.
4. This response focuses on the specific questions raised in the consultation document.

Q1 What is your feedback on lessons learnt from delivery to date?

Many of the lessons learned have been captured through the evaluations carried out by Miller and Wavehill and are reflected in the Regeneration Framework.

One of the strengths of the current programme has been that the process of drafting plans and delivery of projects has brought a range of organisations together and has promoted a greater understanding and appreciation of respective roles and responsibilities.

One of the key difficulties has been the annual spending cycle and in some cases, lateness of funding approvals which has resulted in funding being allocated to projects that can achieve the spend deadlines rather than to more worthwhile projects. This has caused difficulties for larger capital projects which can have a long lead time. Short term funding is not appropriate for these types of projects particularly when there is a long period of project development including site assembly. Future policy needs to have greater emphasis on the continuity of programmes and initiatives identified in the proposed business plan and less restrictions on programme delivery in a financial year.

While there is recognition of the overall role of housing-led regeneration within the context of existing area-based programmes, a vital element to be recognised is the impact of Wales Housing Quality Standard (WHQS) related works being undertaken within every area of Wales by Local Authority landlords and RSLs. The investment in this work has been, and will continue for some time, to be a critical regeneration driver for improving homes, improving the surrounding wider environment, providing employment and training opportunities, procurement efficiencies, etc.

Regeneration funding has been predominantly capital and this has restricted the range of 'softer' regeneration activities that have taken place in particular around skills and training. It could be argued that this split has resulted in a greater concentration of regeneration activity focusing on place rather than people.

Q2 Should other national outcomes or principles be considered?

There is evidence to show that interventions (Flying Start, Families First) with children and families during the pre-school years is effective in reducing future problems in relation to learning and health, and therefore it is suggested that the results of this type of intervention is reflected in the outcomes.

If Regeneration policy is indeed to move communities away from dependence to independence as stated in the Framework then this should be reflected in the outcomes. For this happen, communities need to be able to understand how they can be involved in the future of their communities and therefore an outcome such as 'Empowered communities working to improve their future' or similar could be included.

We offer the following comments on specific outcomes:

- Outcome One 'Prosperous Communities' includes 'well connected communities supported by transport and broadband connections' – this should also include Wi-Fi and reliable mobile phone coverage including 3G and 4G.
- Outcome three: Healthier Communities; The achievement of outcomes often relates to the sufficiency of key components, therefore it is suggested that the third bullet point under this outcome should be amended to read "A sufficient supply of good quality housing which is affordable and provides tenure choice". Greater emphasis should also be given to the role that local accessible open space and natural

environment/green space has in improving health and well being. It is suggested that 'A well planned, accessible open space and accessible natural green space' could be another outcome.

- WLGA would also draw attention to reference in the outcomes to successful town centres and seaside towns but there are no outcomes or references specifically relating to rural communities, which is of concern.

We would emphasise the need for a greater focus on sustainability, especially in light of Welsh Government's forthcoming Sustainable Development Bill, which will place a duty on the public sector to plan for the long term by clearly integrating social, economic and environmental outcomes.

Q3. What more can be done to achieve greater coherence and cross cutting action across departments

As set out in the consultation document there is a wide range of policy development in train across the various divisions of Welsh Government which will impact directly on the proposals within this consultation document. The WLGA therefore welcomes the recognition by Welsh Government that more can be done to achieve greater coherence and action across departments. However, what is not clear is how this is to be achieved. We would welcome clarity on how the Minister for Housing, Regeneration & Heritage proposes to work with Cabinet Members to influence activities of other larger departments and further their understanding around their role in Regeneration.

In addition to the 'traditional' departments that impact on regeneration, the activities of other departments can also make a contribution (e.g. the role of new school development in terms of generating local construction work and community development opportunities). There is increasing understanding and evidence in local government on the benefits from local procurement and through the inclusion of social clauses in procurement frameworks. It is vital that Welsh Government and Local Government continues to work closely on procurement initiatives to maximise the benefits to businesses in Wales and the local communities in which they operate and to explore how future regeneration funding can benefit local businesses and support economic development.

Q4. Do you agree with the national, regional and local approach set out?

For the purposes of the consultation document it is useful to set out the different tiers of delivery, however, for successful regeneration to take place all tiers need to be working together successfully and each tier of delivery needs to be clear on the part they play in the overall delivery. Care will need to be taken to ensure that that decision making is not slowed down unnecessarily as a result of overly bureaucratic reporting procedures.

Clear terms of reference and transparent decision making will be required for all levels. Local government is unclear on who has responsibility for the final decision regarding funding approval for projects.

National

The consultation document proposes that the Ministerial Advisory Board emerges from the current National Regeneration Panel. As a consequence of the proposed remit for this group, this will be a powerful and influential group

where accountability and representation assume particular significance. Further clarification is required on the composition of the group and how conflicts of interest will be avoided where representatives have a mutual interest in both the Ministerial Group and the investment plans of the regional boards.

Regional

It is at the regional level that governance arrangements are least clear and where most concerns have been raised by local government. The proposal to align the regional tier with the WLGA Regional Partnership Board footprint has merit in that it recognises that there are existing structures in place. However, it proposes the establishment of three additional Boards. There is a very real danger that the various regional groups/boards with overlapping remits will be set up which will result in duplication of effort, inefficiency and poor outcomes. Local authorities have also raised issues about the sheer geographic size of these regions to deal with localised regeneration initiatives and the logistical difficulties of organising meetings (e.g. who sits on the boards? where are meetings held? who chairs?).

For example the City Region Report (July 2012) recommends that: “an overarching city region strategic planning tier to ensure city region hinterlands benefit from the growth of their cities and have a voice in cross-boundary development. This should provide a clear hierarchy of decision making as in Scotland.”

Separately the planning Independent Advisory Group Report (June 2012) recommends that:

“Recommendations 8-11

The Planning Bill provides a statutory framework to enable the introduction of strategic planning.

The Welsh Government consults on the areas where strategic planning is required and the details of a statutory framework for plan making to ensure it is fit for purpose in Wales.

The Welsh Government puts in place a national support structure to ensure delivery of the proposed regional strategic planning arrangements.

The Welsh Government encourages voluntary strategic planning arrangements in advance of any legislative changes, using tools available across all Government departments to ensure such work is democratic, consistent, accountable, transparent and inclusive.”

The revised Communities First programme, proposes the setting up of six Regional Boards and there are in place three WLGA Regional Partnership Boards. There could also be regional level regeneration groupings established in relation to European funding opportunities under the new programmes.

This is not a specific issue for Regeneration but of wider concern as illustrated by the examples above. It seems more sensible to review and adapt existing structures than to create more. This would otherwise add further bureaucracy, which is unnecessary and make unrealistic demands on limited resources.

In North Wales, the new “Economic Ambition Board” (comprising the 6 North Wales LAs), working with the North Wales Economic Forum could provide the basis of the “Regional Board” for the delivery of the regeneration priorities for North Wales – although it is accepted that further work is required to ensure

that any Board is representative of the whole region. The same six authorities are also working together on transport planning via the Taith Consortium (involving a joint committee of local authorities, as with all the RTC). All the RTC have the potential to increase their role as a result of ongoing work under the Simpson Compact, which could see them take on additional responsibilities at regional level.

The consultation document recognises that regeneration is not limited to regional boundaries but there is no mention in the document of any cross border relationship with England. In North East Wales there is the interdependence between NE Wales and the Cheshire West and Chester in particular, in terms of transport infrastructure, employment and skills, leisure; recreation and retail opportunities and access to health care, to name but a few. This is recognised in the sub region through a partnership between neighbouring authorities referred to as the Mersey Dee Alliance.

In the South East, the Regional Partnership Board brings together the 10 South East authorities. A regional development framework is being developed, identifying key sectors and critical infrastructure needed to develop an integrated region. The ten authorities also work together on Highways & Transportation issues through SEWTA and the recently announced South East City Region task & finish group will consider regional structures and report back to the BETS Minister by the end of January. The result of this work will impact on the new Regeneration Framework.

In the South West, there has been a Regional Partnership Board involving four authorities (Carmarthenshire, Neath Port Talbot, Pembrokeshire and Swansea). Recently, the Board has expanded to involve the two central Wales authorities of Powys and Ceredigion. The four SW Wales authorities have been working together on long term development plans for the region. They also have a highly effectively Regional Learning Partnership, which brings together regeneration and education, involving not only the local authorities but also the FE and HE providers. The Transport Consortia of SWWITCH (South West) and TRACC (Central) bring these authorities together to work on transport plans.

The WLGA would welcome further discussions on suitable governance arrangements at the Regional level. The interrelationship with regional level planning also needs to be thought through clearly in light of the recommendations of the Independent Advisory Group established by John Griffiths AM.

Local

There needs to be clear lines of communication from the local tier to the regional tier in order that local evidence and planning can be fed into the process that is adopted to determine targeting of funding at a regional level. It is also at the local level that clear, consistent monitoring and evaluation systems need to be put in place in order to inform regional and national monitoring arrangements.

Communication with communities will take place at the local level and it is imperative that there is a clear message from the other tiers of the delivery structure to this level so that communities how they fit into the overall picture, have an understanding of regeneration policy and how, if appropriate, funding can be accessed for local projects. This will be vital in terms of securing

ongoing involvement of local communities in regeneration activities – otherwise there is a danger they will feel that ‘top down’ plans are replacing – rather than complementing – the proposals they are engaged in at the local level.

Comments on our proposals for how we will target and direct our funding?

Business Plans

The New Framework makes reference to business plans evidencing how the funding will achieve national outcomes and “other specific regeneration outcomes (to be determined).”

Clarity is sought on who is to determine these regional outcomes and when. Is it the intention that these regeneration outcomes will be determined by the Regional Partnership Boards and approved by WG before the body of business plans are prepared? The importance of having local democratic input to the planning process must be recognised. Local authorities have voiced strong objections to any possibility of proposals being developed and signed off by ‘quangos’ of unelected representatives.

The consultation refers to an area based approach being required to understand the opportunity and needs of the region, with broad agreement that the neighbourhood or community level of intervention is an essential component of the delivery mechanism. In light of the size of the proposed regions, especially, the task of gathering evidence at this level should not be underestimated if it is to be on a consistent basis. The risk of such area based plans suffering the same fate as the Spatial Plan has been a recurring comment.

A more pragmatic starting point may be to build on the regional regeneration/development strategies that the Regional Partnership Boards have been developing. These can be used to help shape business plans and inform funding decisions. Where necessary, existing evidence gathered to support current or developing policy such as Regeneration Strategies and Local Development Plans, Communities First Clusters could be used to inform the business plan.

WLGA would welcome further discussions on the guidance that is to be issued on what is expected in a business plan. Given the timescales involved in having the business plans in place and the new Framework live from 2014/15, it is imperative that this guidance is issued to the Shadow Boards as early as possible. This guidance should also state the time period that these business plans are to cover. The New Regeneration Framework does not specifically state a timeframe although the principle of Sustainability recognises the need to move away from short term, political horizons and to inter-generational timescales of at least 10-15 years.

The review also states that the Regional Boards will produce regional policy and planning. Clarity is sought on the definition of planning and its relationship with existing and future regional planning. A regional tier of spatial planning is proposed by the Independent Advisory Report commissioned to inform the future Planning Bill, but in order for this tier of planning to ‘have teeth’ it will be required to go through a statutory consultation process. If this statutory examination does not take place then again, the fear is that the regional planning advocated here is likely to suffer the same fate as the Wales Spatial Plan.

Funding Levels

The report does not provide details of funding levels to support the different investment streams. In line with earlier comments and reflecting the budgetary pressures faced by central and local government, it would not appear appropriate to provide significant funding for the evidence mapping as much of this information is already available in other plans. Also the consultation does not set out the capital/revenue split proposed, or the impact on the budget of honouring existing commitments in the Regeneration Areas and/or Housing Renewal Areas. Without the necessary financial information it is difficult to comment on whether the proposed interventions are appropriate. However, WLGA does consider that there is a key intervention missing from the list. Earlier in the consultation document (Page 29), reference is made to characteristics of persistent deprivation which include derelict sites & buildings and contaminated land. However, the list of types of intervention on pages 31 and 32 does not prioritise funding to tackle these issues. In many parts of Wales, the private sector will be unable to be active partners in regeneration without significant public sector funding to tackle derelict land and buildings and contaminated land.

Spatial Targeting

The consultation does not explicitly state that the Regeneration Areas will cease to exist under the New Regeneration Framework once existing commitments are honoured. To avoid any confusion WLGA would suggest that the position is made clear.

The future spatial targeting of funding remains unclear with reference to the setting of robust criteria for proposals. WLGA would welcome further discussions on the criteria. There are local authorities who believe that the Regeneration Areas should continue and indeed the research conducted by Miller Research found evidence that “... Regeneration Areas are perhaps beginning to mature into effective delivery partnerships and Government support to maintain their strategic prioritisation and co-ordinating remit to respond to local needs should be encouraged” with a recommendation for “Maintaining ‘special’ status: Continuing to recognise the special status of the Regeneration Areas in a way that helps test and develop cross-sector approaches within Government and maintains a suitable high profile to help lever-in other funds”. Is there still scope for Regional Boards to retain a focus on the existing Regeneration Areas where the evidence justifies continued support if they so wished?

Housing Renewal Areas

Given the available evidence to support the effectiveness of the housing renewal area approach as a proven intervention, it seems anomalous to identify that “the future of housing renewal funding needs to be carefully considered and needs to be used to ensure maximum outcomes are achieved” (Page 32). This consideration is surely equally applicable to each of the interventions identified under the “Successful Places” investment stream, and to funding for the framework as a whole. It would be wrong, therefore, to apply this consideration to housing renewal funding alone.

European funding

We welcome the references in the Framework to utilising future European Funding for Wales in the 2014-2020 programming period to support and deliver holistic projects for regeneration, combining investments from ERDF and ESF. This resonates with local government's current thinking around utilising future European Funding in a much more integrated and holistic way to support and deliver joint regeneration actions at regional, sub-regional and local levels in the new programming period. We would welcome further discussions with Welsh Government on the opportunities for maximising future European Funding for Wales in this way, to include consideration of indicative funding allocations and the possibility of negotiating funding packages (involving European and domestic funding) for the delivery of integrated activities at the most appropriate spatial level.

We want to ensure effective monitoring and evaluation of regeneration activities; will the approach set out achieve this?

WLGA would suggest that any monitoring and evaluation systems are reviewed by the Wales Audit Office to ensure synergy and alignment with tools and processes already in use amongst most Local Authorities and other organisations. From a resources and effectiveness perspective it is essential to ensure that we are not reporting upon the same outcomes more than once using different tools and that there are standardised definitions.

In partnership with local government, it may be appropriate, cost effective and consistent if Welsh Government were to commission the private sector to manage the monitoring and evaluation. If this is not a desired approach then it is essential to increase evaluation capability and expertise within the public sector. Due to reduced public sector resources, local government cannot continue to tender/ commission the private sector in relation to every project and programme activity.

It is also essential to recognise that the impacts may not be visible immediately and a long term approach is needed.

83. Robert Chapman & Co

Introduction

By way of background, I attended the national regeneration conference on 15th November 2012 at Parc Eirias Events Centre, Colwyn Bay.

Subsequently, I attended a workshop in Merthyr Tydfil. I am a regular attendee at CREW events and, indeed, Cardiff University (School of Geography) I and E events. The nature of my interest is simple: I want Wales to be in a better place.

Regrettably, this response will not be as fulsome as I wanted it to be. Time has slipped by and other priorities have intervened around sustaining my property & regeneration consultancy. However, it is better to provide something rather than nothing, hence this abbreviated response.

In providing my response, I have had the opportunity to peruse a consultation response by Alan Brown (AB), MRICS www.alanbrownassociates.com. I have to say that I agree wholeheartedly (100%) with Alan's comments. For the reasons stated in the preceding paragraph, and in providing my response, I

will take the opportunity to underscore a number of Alan's salient points, which will be referenced as AB.

Context

What is Regeneration? This is a useful starting point for my response. I refer to the Welsh Audit Office report prepared in 2005, in which it was defined as: 'The upgrading of an area, taking a balanced approach to improving the wellbeing of communities through social, physical and economic improvements' (WAO 2005)

I am also mindful that regeneration is founded on the three foundation stones of partnership, strategy and sustainability (i.e. synthesising the economic, environmental and the social with good governance).

With these thoughts in my mind, I read the Vibrant and Viable Places strategy document. I have to say honestly that it did not bowl me over. Where was the 'wow' factor or the spark? I was reminded of the statement by Aneurin Bevan. 'The biggest hurdle we face is the poverty of our imagination'

It also made me reflect: what is a strategy? A lucid definition of a strategy is a solution to a clear and specific challenge to be overcome bit.ly/137Y890 . Therefore, the 'hanging question' is whether or not the document produced by Welsh Government addresses these points??

Before responding to the six questions posed in the consultation document, I just wanted to ponder on what we could learn from other strategies?

In the 'Economic Strategy – Learning Legacy Module 1' produced by Yorkshire Forward and Economic Development in July 2011 and written by Les Newby, a 'good strategy = evidence x preference' (the best strategies and action plans do things that are both wanted by partners and backed by evidence). So often in Wales, I get the predominant sense that things are 'done' to communities in a 'top down' fashion without a substantive evidence base (I exclude the recently produced suite of documents to complement the strategy). For the latter, we could learn lessons from the MIER report (<http://www.manchester-review.org.uk/>).

'a Commission of prominent economists and business leaders, supported by a Policy Advisory Group and Secretariat, with responsibility for commissioning high quality evidence-based research to inform decision-makers in Manchester'

In terms of the current regeneration areas, can it be said that they were designated based on a substantial evidential base?

The RICS has investigated successful regeneration strategies in England (Successful Regeneration: Perspectives from England <http://ppl-grp.com/VisionforCities.pdf>

and in doing so arrived at eight key factors, which are set out below. Are there lessons to learn here?

1. Strong local leadership;
2. Achieve community buy-in and support;
3. Long term strategies;
4. Recognise and support the key growth drivers;
5. Local finance initiatives;
6. Competition;
7. Focus on opportunities, not just need;
8. Unlock and recoup land values.

In 2011, The Scottish Government in Edinburgh delivered its own regeneration strategy: Achieving A Sustainable Future – Regeneration Strategy <http://www.scotland.gov.uk/Resource/Doc/364595/0123891.pdf> I have to say that there is something about the language and structure of the Scottish approach to developing a strategy that makes it more cohesive and enjoyable to read. It is for that reason that I wish to highlight a number of points or themes that are made in that document, which I think are relevant.

1. By way of comparison, the Scottish state that “Regeneration is the holistic process of reversing the economic, physical and social decline of places where market forces alone won’t suffice”.

2. They provide a regeneration vision. I am not clear what the overall VISION is for Wales, never mind the regeneration vision. Because there isn’t a clear vision for where Wales is headed, it seems to me that as a consequence Wales does not have a clear economic development strategy. In Scotland: ‘Our vision is a Scotland where our most disadvantaged communities are supported and where all places are sustainable and promote well-being’ ‘This vision can only be delivered if regeneration is approached in an holistic way by addressing the economic, physical and social needs of our communities. These key elements cannot be delivered in isolation – each is connected and vital to success.’

3. Scotland’s economic strategy is to ‘focus government and public services on creating a more successful country, with opportunities for all of Scotland to flourish, through increasing sustainable economic growth’. See Figure 1: The Purpose Framework.

4. “Regeneration has an important contribution to make to the delivery of the Purpose. In particular, it supports the Purpose targets of cohesion (to reduce the disparity between the regions of Scotland) and solidarity (to reduce income inequalities), by tackling area inequality, addressing market failure, and increasing opportunities for areas of need to attract investment and jobs and to enhance the well-being of communities”.

5. “The relationship between economic development and regeneration is co-dependent – equitable economic growth cannot be delivered without improving our under-performing areas, and successful regeneration cannot be delivered without investing in development, growing local economies and delivering sustainable employment”. This is an important point because it recognises the importance of connecting need and opportunity.

Figure 1 – source: Achieving A Sustainable Future – Regeneration Strategy, Scottish Government, Edinburgh

6. ‘Scotland’s towns and cities are the backbone of Scotland’s economy. In particular, our cities play a vital role in driving forward economic growth. The more successful our cities and their city-regions are, the more successful Scotland will become’. This statement is a clear recognition of the importance of city regions in Scotland. I don’t see that in the Welsh Government’s strategy. See later for more on this.

7. Connectivity: “Ensuring that people and places are well connected both physically and digitally can play an important role in delivering regeneration outcomes and sustainable communities”. The Welsh Government’s joint venture with BT to roll out broadband connectivity throughout Wales should be applauded and promoted (e.g. promoted like Superfast Cornwall <https://www.superfastcornwall.org/> in order to keep all communities apprised of progress). Electrification of the lines in South Wales and further exploration of enhanced connectivity in North Wales should also be applauded. This should include the Metro scheme promoted by Mark Barry of Cardiff Business Partnership. Connectivity and enhanced infrastructure is relevant to regeneration. For example, I am encouraged by the Welsh Government’s interest in our ‘international airport’, and the private sector’s interest in the Severn Barrage <http://www.clickonwales.org/2013/01/new-severn-barrage-would-exploit-two-way-tides/>

8. Delivery of regeneration vision relies on a wide range of supporting outcomes being achieved. These are not unique to regeneration and “many cross over into wider government policy, including economic development, planning and place-making, public health, justice, safety, housing, business support, education and skills.” The same applies to Wales. For example, what role can regeneration play in improving public health when currently half of adults and one third of children in Wales are overweight?

9. Scotland recognises that “much of the regional / economic regeneration policy in the past has been applied to depressed and marginalised areas. What is required now is the need for a balance of investment in all areas – both weak and strong – aimed at promoting overall sustainable economic growth”. This a key point. In other words, it is about maximising the potential from opportunity whilst also addressing local need. In his research in 2009 / 2010, Bessell pondered whether the Welsh Government’s approach was to sustain poverty (http://www.rchapmanandco.com/blog_details.asp?id=79). Regeneration must reflect a delivery model which connects communities and does not treat deprived neighbourhoods in isolation. This requires a co-ordinated approach across the public, private and third sectors, alongside community led action.

10. A propos regeneration in Scotland, it is stated that the approach to locality should ask in simple terms, “what makes this place good and where do the opportunities lie”, and “what expertise and skills do local people have”, instead of labelling particular areas and people as “a problem”.

11. “The public sector should make the most of the assets and resources that are available in order to support local regeneration activity, and should take account of the needs of communities when making investment decisions in relation to physical and economic development”. This point is certainly applicable to Wales and in Scotland “regeneration in the current context of developing policy must reflect a model of financing and not of funding as previously expected”. It seems to me that this is about responding to circumstances and therefore the need to consider innovative financial

solutions. I attended the SocInvest – Innovations in Regeneration Finance conference last Summer: as far as I could tell, I was the only delegate present from Wales <http://www.socinvest.co.uk/conference.html>. Surely we can learn lessons from others?

12. Annex B in the Scottish Regeneration Strategy provides a useful description of 'roles and responsibilities' of the pertinent actors. Something similar in Wales would be useful for reasons of clarity and transparency.

Finally, turning to England for a moment in this 'learning lessons' section, I point to the Department for Communities and Local Government January 2011 report entitled: Regeneration to enable growth: What Government is doing in support of community-led regeneration. However, what I found most useful was the accompanying document entitled: Regeneration to enable growth: A toolkit supporting community-led regeneration, January 2012 https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/5983/2064899.pdf This document provides tables setting out policies, rights, funds etc that can help individuals, consultants and all organisations (including communities) to drive forward or influence regeneration. Such a document in Wales would be very welcome and dare I say it is essential for greater transparency.

The latter mentioned document makes two statements that resonate with my own experiences. Firstly, '.....economic growth is essential if we are to tackle unemployment, poverty, poor health and inequality, and improve standards of living'. At long last, I get a sense that this is being recognised in Welsh Government albeit there is still a long way to go. My presentation to a Welsh meeting of the Institute of Economic Development underscores this point.

<http://www.rchapmanandco.com/uploads/documents/IED%20presentation%20-%20RIC.pdf> Slide 17 provides a list of strategic regeneration topics that can be linked to LED.

Secondly, '.....regeneration activity should be led by communities not by [Cardiff Bay]'. That is why [Assembly Members] should devolve power from [Cardiff Bay] to the Town Hall, 'putting residents, and civic and business leaders, in the driving seat – which is when regeneration is at its most powerful and effective'. The weak response to a city region approach in Wales may suggest that contrary to the above statement, Welsh Government perceive them as a threat, which in my opinion would be wholly wrong.

Response

1. What is the feedback on lessons learnt from delivery to-date?

I agree with the response provided by AB (Alan Brown). In particular, on the point of whether the people of Wales are better off? The outcome of devolution so far is what Professor Kevin Morgan referred to as 'Wales dirty little secret'. I provided my own assessment in June 2011:

<http://www.rchapmanandco.com/uploads/documents/Economic%20dividend.pdf>

Furthermore, I agree with AB that: (i) current devolutionary regeneration policies have largely failed; (ii) what has gone before is not OK; (iii) the document does not identify the 'spark' of successful regeneration schemes / initiatives; (iv) there is little recognition of people, communities or companies who 'light the fire of regeneration'(see his examples) – in other words, good practice is a 'bad traveller'; (v) the tone of the document suggests that the 'public sector is the primary stimulant for regeneration' (in reality, this may be the case but it does not mean that it is right in a state-centric country and my sense of it is that communities tend to have things done to them); (vi) 'WG should direct their efforts to supporting innovative regeneration proposals'; (vii) 'the new agenda must move towards a focus on resilience' and 'people based strategies' (RIC: production instead of consumption. Indeed, production and consumption should work together for the benefit of all, and the mantra of 'growth' should consider consequences for our generation or future generations {Brundtland}). Therefore, bold plans for regeneration transformation need to be founded on sound social and environmental premises, accepting a just and healthy society, where accessibility for all is the key for intellectual, cultural and economic exchange. Places that appear to be taking sustainable living seriously are the likes of Freiburg, Portland and Lakeside, Chicago.); (viii) My own research suggests that people and place are inextricably linked

<http://www.rchapmanandco.com/uploads/documents/People%20and%20place.pdf>

–“ it is a ‘false divide’ to treat them apart – and well-being must be to the fore in regeneration schemes. In areas of significant deprivation, as Stuteley discovered, local people need to be empowered because they are ‘the experts’; (ix) ‘hard decisions have to be made about delivery structures and allocation of budgets’ (governance by another name – more on this later).

2. Should other national outcomes and principles be considered?

I agree with the response provided by AB: in particular, the fact that ‘regeneration cannot be viewed or delivered as a standalone activity’. Cross reference this with my review point eight of the Scottish document (see earlier).

3. What can be done to achieve greater coherence and cross cutting across departments?

I agree with the response provided by AB. Effectively, this is about governance. Alan questions whether it is possible to deliver regeneration when the topic is covered by two different Ministers. The allied question is whether (as per point 8 of my review of the Scottish strategy) Ministers & civil servants work together seamlessly to provide a cohesive and structured approach?? At a local authority level, my city-region research revealed significant tensions between local authorities and WG civil servants, especially my interviews with regeneration officers. Also, refer to the opening slides of my IED presentation.

http://www.rchapmanandco.com/topical_issues.asp?int_id=52

<http://www.rchapmanandco.com/uploads/documents/IED%20presentation%20-%20RIC.pdf>

Alan makes reference to “two departments working separately with budgets and programmes delivered at differing timescales and levels of priority”.

Previous research on my part echoes this point.

First, research by Bessell (2010) revealed a lack of coherence in governance with conflicting and misaligned priorities. The absence of a dominant strategic rationale and coherent investment approach is compromising the optimal use of scarce resources to achieve the greatest socio-economic benefits for the Valleys. http://www.rchapmanandco.com/blog_details.asp?id=79

Second, in a response to the National Assembly for Wales concerning funding and governance (p.6), Roger Tanner stated: “this has proved unnecessarily difficult because the spatial priorities of WEFO are not the same as the SRA programme and different again from the Wales Spatial Plan’s key centres that the projects are expected to support. For good measure the Communities First spatial priorities are different again. Caerphilly CBC were therefore unable to put together grant packages for Blackwood or Caerphilly but did manage to obtain funds for Bargoed and Newbridge in what seemed to us to be a bit of a lottery. Moreover applications for WEFO funds not only have to be approved by WEFO but in most cases separate

approval against different criteria is also required for Targeted Match Funding (TMF) from the Finance Ministry.”

Third, according to Roger Tym’s report local authorities feel that there is “no http://www.cardiff.gov.uk/objview.asp?object_id=21155, real utility in an unenforceable ‘duty to co-operate’, and paragraph 3.25 finds that there is a limited cross-boundary evidence base and that there are “difficulties of achieving consensus on anything other than general matters” (ibid: p.30-31). Returning to the question for a moment – ‘What can be done to achieve greater coherence and cross cutting across departments?’ – it seems to me that if one reflects on the three evidential points above, then the only conclusion one can deduce is that there needs to be some form of in-depth governance review or audit to ensure greater efficiency in the mode of working between departments and governmental bodies. The current situation is inimical to regeneration and to Wales.

I agree with the points made by AB about ‘Total Place’ and ‘Results Based Accounting’. What gets measured gets done.

4. Do you agree with the national, regional and local approach set out?

I agree with the response provided by AB. In particular, it would be very concerning if proposed governance vis-a-vis new framework bodies was a ‘done deal’. Putting to one side the elephant in the room (why we have 22 local authorities in what is a small country?), the key point I wish to underscore is the importance of functional economic areas , in particular city-regions and how they could be harnessed to

<http://www.rchapmanandco.com/uploads/documents/The%20Role%20of%20a%20City-Region.pdf> improve economic performance in Wales. It would be strange to consider structures when a strategic decision on city regions (Cardiff, Swansea and North Wales) is in the process of being made, even if the Minister’s announcement prior to Christmas 2012 was disappointing http://www.rchapmanandco.com/blog_details.asp?id=81

In a sense this takes us back to the VISION for Wales and its associated economic strategy. If it is a ‘One Wales, One Planet’ approach leading to a ‘clean revolution for Wales’ (a campaign to accelerate Wales’ green economy) then so be it but let’s have clarity

http://www.cbi.org.uk/media/1552876/energy_climatechangerpt_web.pdf

Balanced representation is essential. I share AB's comments about the cultural dimension in Wales: 'WG and the public sector are comfortable talking to each other but not the outside world.' Engagement with the private sector is weak, albeit I have been encouraged by the approach taken by the Minister for Business to seek private sector representation in chairing the sector panels. We need to move away from this incestuous public sector bubble to ensure enhanced representation for all parts of the community.

5. Do you have any comments on our proposals for how we will target and direct funding?

I agree with the response provided by AB.

In particular, in my opinion, if there is an acceptance that functional economic areas present a way forward in Wales (cf England's LEPs), then 'business plans' should be prepared for each of these areas embracing vision, evidence base, strategy, action plan & timeline, implementation, and funding. The overriding issue is incisive governance as well as 'outputs' and 'outcomes' that can (within reason) be measured. Interestingly, a Sell2Wales notice was issued on 25th July last year for the preparation of a Regional Economic Regeneration Strategy for the four local authorities in South West Wales, in conjunction with the South West Wales Economic Forum and Regional Learning Partnership. This recognised WG's proposed city region approach to economic development.

Attending the Nesta conference in Wales last week, re-ignited my belief in innovation (Innovation is not for superheroes!) and the fact that good practice is a bad traveller.

<http://www.rchapmanandco.com/uploads/documents/Innovation%20is%20not%20for%20superheroes.pdf>

http://www.nesta.org.uk/events/assets/features/nesta_in_wales_the_speakers

In essence, I am suggesting that targeting and direct funding should also assess innovation as a key component part of any regeneration scheme. Certainly there are lessons that could be communicated about the successes in Wales of: MyTown Media Ltd; Spice; The Green Valleys; timto; creative councils and Welsh Crucible. Such innovations (representing a bottom-up approach) could inspire other innovations pan Wales.

European Funding should be a means to an end. My opinion is that this source of funding is seen exactly as that – a source of funding for schemes – whereas it ought to be seen as part of a sustainable economic regeneration strategy. I draw your attention to the Third CoR Monitoring Report on Europe 2020 which recommends priorities that boost growth and implement partnerships

<http://portal.cor.europa.eu/europe2020/SiteCollectionDocuments/Third%20CoR%20report.pdf>

I agree with the themes stated by AB. There are three others that should be mentioned. First, innovation, as mentioned above. Second, innovative finance. In an era in which one has to do more with less, we surely have the expertise here in Wales (e.g. Professor Gerald Holtham; David Swallow etc) to consider: pooling of assets; special purpose vehicles; tax increment financing; the use of pension funds; crowd funding etc. Is there scope to marshal these together in order to present a range of opportunities for communities / organisations attempting to secure funding? For example, Greater Manchester Pension Fund (which represents the city region of ten local authorities) is setting up a ground-breaking partnership with Manchester city-council which could eventually see thousands of new new homes built across the city-region. The local authority will provide land and the fund will provide equity with which to build houses and flats. Third, good practice. I have been surprised that we do not spread our existing good practice. For example, Coastal Housing in Swansea has ably demonstrated housing-led regeneration; stock transfer to the mutuals has been a great success – why can't this be mandated throughout Wales?; Planed's work in rural Pembrokeshire has been excellent in sustaining rural communities etc., etc. The question then is how can we capture this best practice and disseminate it to communities pan Wales?

6. Effective Monitoring and Evaluation of Regeneration Activities

I agree with the response provided by AB.

In particular, I agree that governance should be dealt with comprehensively at the outset of any scheme or programme (s).

It is often said that regeneration takes a generation and so 'effective monitoring and evaluation systems should recognise this.'

Robert I Chapman

84. Neath Port Talbot Council for Voluntary Services

A response to the Welsh Government consultation document Vibrant and Viable Places

Neath Port Talbot Council for Voluntary Service (CVS)

Neath Port Talbot CVS is the County Voluntary Council and a Charitable Company set up to promote, support and develop the Third Sector in Neath Port Talbot. It has over 500 member organisations and is in touch with over 1,000 Third Sector organisations operating in Neath Port Talbot.

The organisation has strong partnership links locally and regionally and has a formal secondment arrangement with Welsh Government that funds a CVS member of staff to work with the Western Valleys Strategic Regeneration Area team based in the Welsh Government office in Penllergaer. This has strengthened the links and relationship between the third sector and Welsh Government's regeneration team across the Strategic Regeneration Area. The organisation is re-focussing its links with regeneration at a strategic level through the creation of a Third Sector Regeneration Forum, which is currently chaired by the Chief Executive of the largest Registered Social Landlords (RSL) in the area, Neath Port Talbot Homes.

Introduction

Neath Port Talbot CVS has made available on its website and through its general information services, access to the document and to its supporting information and has hosted two public consultation events on behalf of and in partnership with Welsh Government. These events have been open to third sector organisations as well as partner organisations in the County Borough of Neath Port Talbot, in the Western Valleys Strategic Regeneration Area.

Remarks

Neath Port Talbot CVS welcomes the opportunity to comment on the review and has contributed to and fully supports the comprehensive response made to the review by WCVA in which Neath Port Talbot CVS features as a case study. The organisation wishes to make additional remarks which have been gathered from its own local consultation events. Neath Port Talbot CVS feels that the document is an opportunity to influence Welsh Government policy on regeneration and has taken into account the views and comments gathered at these events. These are summarised below:

- Indications from the local sector are that there are good examples of cross-sector involvement but that this needs to be further enabled, encouraged and facilitated. Further, third sector organisations indicate that approved projects have had a positive impact on the local community and on individual organisations.
- The early application and approval processes were difficult and not tailored for third sector organisations; however feedback on this was received by Welsh Government and acted upon – although the new application processes are yet to be tested by third sector organisations.
- There have to be new ways of involving all sectors in the regeneration process – collaboration is more important than cash! There is a strong feeling from the programme to date that there are too many fixed boundaries; regeneration should be people-centric operating within fuzzy boundaries that involve communities. Regeneration must be owned by the community supported by an effective balance of top-down and bottom-up approaches.
- Third sector feel that the many existing boundaries are confusing, and where they sit within the Welsh Government's plea for joined-up working and cross-portfolio integration. There needs to be synergy between all strategies for regeneration that can be embedded in regional approaches. Better cross-portfolio planning systems, joint approval processes and sharing of inter-departmental and cross-sector resources could help ensure greater coherence and cross-cutting actions.
- Some models exist to demonstrate the effectiveness of this including a secondment arrangement between Neath Port Talbot CVS and the Welsh Government's Western Valleys SRA team; a third sector interface officer role from the third sector and part-based based with the Welsh Government has represented and facilitated third sector involvement for that region.
- Some concern is expressed over the role and composition of the proposed Regional Boards. There is general acceptance that regionalisation is required, but concern that the local agenda will be lost. The role of the LSBs is one that could be strengthened to ensure that localism features strongly in regional planning and implementation strategies. It is felt that local advocacy must be strong and that this could be achieved through a strong and

influential LSB. This must be supported by clear communication processes between local communities and local planning processes. County Voluntary Councils are an effective means by which to achieve this.

- There is a strong plea from the local sector for recognition of the sector, its strengths and energies in enabling, facilitating and supporting regeneration. It is felt that much innovation and concepts come from community-based grass roots; connecting these with larger organisations that have scale both to fund and deliver will be critical. The regeneration framework needs to support this.
- There should be a drive for a clear and coherent strategic approach and vision leading to a new culture of engagement and collaboration involving the community and all sectors including private sector businesses. Third sector involvement is critical. There also need to be clearly identified outcomes and outputs identified at the start of any new programme to enable effective measurement of success and impact. However, it should also be recognised that in the current difficult economic climate that organisations can be perceived to fail even though they have done what is expected. How will we know whether we have achieved – measuring added value will be key – RBA has value but this should not be at the expense of other models for measuring impact.
 - It is felt that the framework provides the chance to build a land of opportunity through the creation of vibrant town centres that need to reinvent themselves in a world increasingly dominated by on-line shopping, and become destinations that are culturally and socially focussed, providing strong support for surrounding communities. Mixed use town centres would be encouraged including social, economic and residential use. RSLs could feature strongly with their skills, expertise and management of property.
 - Physical regeneration needs to take greater account of accessibility to and provision of transport systems. This came across strongly throughout the consultation period; there is agreement that transport needs to underpin any future support for regeneration.
 - Demographics also need to be taken into account; an ageing population has greater support needs. The capacity and resources for especially for third sector organisations and groups and communities is crucial and recognition given to the fact that many ideas and entrepreneurial drive comes from the third sector.

Neath Port Talbot CVS
January 2013

85. Chartered of Institute Housing Cymru

Introduction

CIH welcomes the opportunity to respond to this consultation. CIH is the professional body for people working in housing and communities, with over 22,000 members across the UK and Asian Pacific. Our mission is to

maximise the contribution that our members make to the well being of communities.

Our response is informed by feedback from our members, our knowledge of the sector and expertise from our policy and practice teams.

Summary of Response

Our key messages are:

- CIH Cymru broadly welcomes the content and the aim of the proposals in the new regeneration framework. We support the proposals for strengthened governance, and improved partnership and collaboration to improve delivery, through combining regeneration funding with other funding streams to maximise delivery.
 - Recognising the full impact and opportunity of regeneration across service areas, communities departments and markets is fundamental when maximising the effect of funding. We fully endorse a move to a more strategic approach that links areas of opportunity to areas of need in the planning process to achieve the greatest impact.
 - CIH Cymru supports the strengthened links made by Welsh Government between housing and regeneration, and welcomed the unification of the two service areas under a single ministerial position. We also support recent 'back office' reorganisation within the department that will help align housing and regeneration more effectively. We particularly support the documents recognition of the positive impact of housing-led regeneration, as well as the significant and varied number of positive outcomes, that are a consequence of the increased delivery of affordable housing. We feel that housing-led regeneration has significant potential to play a major role in delivering the ambitious agenda outlined in the paper.
 - We commend the inclusion of the 'provision of good housing which is affordable and provides tenure choice' as a national outcome and are pleased to see a recognition of the impact of social procurement on communities, through the use of targeted recruitment and training within the document, an approach that has been led by the housing industry in Wales through initiatives like the i2i project, hosted by CIH Cymru.
 - Construction is a major contributor to the national economy, in terms of the employment that it generates, the training opportunities it provides, particularly for young people and generating economic stimulus. House building is a major contributor to economic growth. Housing construction, repairs and maintenance have a direct impact on economic output, providing an average 3% of GDP in the last decade³⁸.
 - Investment in housing development and services results in both stimulus to the economy and savings to the public purse by keeping people in their homes and avoiding the costs associated with homelessness. This is before the inclusion of any benefits and savings to the community, health, education and criminal justice services that
-

are a direct consequence of meeting housing need and providing housing-related support services.

Consultation Questions

1. What is your feedback on lessons learnt from delivery to date?

CIH Cymru is pleased to see that the impact of social procurement on communities, through the use of targeted recruitment and training, has been commended in the report. This approach has been pioneered by the housing industry in Wales through initiatives like the i2i project, hosted by CIH Cymru, with a focus on partnership and local gain. A total of 2,581 jobs and training opportunities have been created through the use of the i2i Can Do Toolkit between 2008 and 2011 and a report likely show continuing achievement will be launched in March 2012.

We are also pleased to see that the importance of social housing landlords, as regeneration delivery agents, within mixed use schemes such as the Swansea High Street project, has been commended, strengthening the case for Welsh RSLs to play a leading role as effective regeneration delivery agents. We would also point out that local authorities have a strong track record of linking housing investment to community development and regeneration. Whilst not underestimating the scale of the challenges of for example welfare reform and restricted capital funds, we believe the case for putting housing at the centre of long term regeneration strategies is as compelling as ever.

We would also like to see reference to the impact and achievements of the Welsh Housing Quality Standard programme in Wales. For example the recent Carmarthen Health Impact report³⁹, evidenced a multitude of health and well-being benefits for those tenants whose homes met WHQS and the impact of the Environmental standard with its emphasis on community cohesion and safety. Initial WHQS investment is also likely to continue until at least 2020 with further resources needed to maintain the standard thereafter. This could be an important source of funding for community regeneration in some of our most socially disadvantaged communities, building on the WHQS Plus approach pioneered by i2i and championed by stock transfer RSLs and local authorities in many parts of Wales.

2. Should other national outcomes or principles be considered?

We support the frameworks' focus on the positive social, economic and environmental outcomes for families and communities. We would however point out that some regeneration outcomes may only be evidenced over a longer period of time, and this should be taken into account for monitoring purposes.

It would also be good practice to engage local communities in determining their own outcome measures, within the parameters set nationally and regionally but with the opportunity to focus on the most important outcomes for local people to ensure a 'bottom up' approach. There are some specific outcomes that could be considered including:

- improved community open spaces and play areas
- reduced inequality

3. What more can be done to achieve greater coherence and cross cutting action across departments?

Securing sufficient resources to deliver outcome will remain a critical challenge if the new framework is to be implemented successfully in Wales. The Welsh housing industry can help to deliver regeneration through partnership utilising a number of housing related funding streams such as Supporting People, Social Housing Management Grant, Welsh Housing Quality Standard resources and Social Housing Grant. The capacity of housing to develop innovative funding models is widely acknowledged and developing all the time. There are likely to be greater opportunities to utilise the experience of landlords as delivery agents for community investment, inclusion of the private rented sector and the established good practice via use of the Can Do toolkit through the inclusion of social and community clauses in procurement processes.

The list of key third sector organisations, working with disadvantaged and excluded groups, should include 'women's groups'.

4. Do you agree with the national, regional and local approach set out?

It is important to align new 'regions' with other plans/strategies to ensure co-terminosity where possible, and avoid duplication of effort and responsibilities, and avoid confusion for strategic leads, delivery agents and communities. For example it is unclear how these regions will fit with Health, Communities First, City regions and other service areas with varying geographical boundaries. It is also unclear how regeneration initiatives that cross the national border with neighbouring English authorities will be achieved.

Governance and accountability, and representation on the new regional groups will be key to the success of a new planning approach. This must be resourced properly, but care should be taken that the process does not become bureaucratic and unwieldy and be unattractive to private investment. Regional Boards should take a partnership approach representing all major stakeholders including local residents and the Private Sector. Reporting to/from local and regional groups requires greater clarification in order to understand the decision making processes, particularly around prioritisation processes and the resolution of disagreements.

5. Do you have any comments on our proposals for how we will target and direct our funding?

CIH Cymru would like to see included the consideration of additional affordable housing delivery within town centre regeneration proposals. We would also like to see greater recognition for RSLs as experienced delivery agents.

It would be helpful to have more guidance on the planning framework regarding the prioritisation process and evaluation to ensure planning is strategic and to avoid 'horse trading' between competing representatives. CIH Cymru is pleased to see that 'potential' is included as an equally important regeneration qualification, alongside 'need' and this will help with the strategic planning, prioritisation and delivery of future regeneration funding.

6. We want to ensure effective monitoring and evaluation of regeneration activities; will the approach set out achieve this?

We would recommend that there is value in research to gather comparative data, comparing the impact of strategic regeneration intervention with other to better evidence the outcomes and benefits and help with future prioritisation. As stated above monitoring should take into account the long-term nature of the impact of improvement outcomes for communities through the use of regeneration projects.

7. Other comments

We support calls from key partners, including WLGA and AWCHOP, for the regeneration spending cycle to take a longer term approach to assist with larger capital projects that necessitate lengthier lead-in times. It makes sense to us that a longer term strategy should link to a similarly timed funding framework to maximise opportunities, benefits and outcomes. We have concerns that the time-scales in 'Next Steps' are overly ambitious and will not be achievable. However the key to addressing this is to commit sufficient resources to underpin successful delivery.

86. Construction Skills Wales

Vibrant & Viable Places: New Regeneration Framework

CITB-ConstructionSkills Wales welcomes the opportunity to respond to the Welsh Government's consultation Vibrant & Viable Places: New Regeneration Framework. A joined up and comprehensive regeneration strategy has the potential to bring numerous benefits to Wales and the Welsh economy, and enable the Welsh construction sector to play a full role in Wales' economy recovery.

Regeneration pays dividends to the Welsh economy not just through efforts to rebuild communities and infrastructure, but through the many opportunities for skills, training and employment which are created along the way. To this end, CITB-ConstructionSkills Wales particularly welcomes a people and place based approach to regeneration, and the Welsh Government's commitment to seek new and innovative ways to deliver better outcomes through joined-up working. The work of CREW in developing toolkits and case studies is a valuable resource in this regard.

Crucial to the successful regeneration of many communities in Wales is the availability of an appropriate skills base to ensure that regeneration is sustainable. The development of green skills and heritage skills will ensure that Wales can capitalise upon historic assets whilst creating a low-carbon built environment fit for 21st century.

Existing Welsh Government regeneration programmes, such as Housing-led regeneration, and the implementation of the Welsh Housing Quality Standard, have provided the foundations for schemes which have maximised the potential of public investment through innovative partnerships and progressive procurement. Cartrefi Cymunedol Gwynedd is one such organisation which has used investment under the WHQS to create a plethora of training and apprenticeship opportunities, not to mention benefits for Welsh sub-contractors through local supply chains.

As the Sector Skills Council and Industry Training Board for construction, with over 4,000 employers actively engaged through our regional construction fora,

CITB-ConstructionSkills Wales is best placed to advise on the how a joined-up innovation strategy can deliver the skills and workforce needed to build a vibrant and viable Wales. I look forward to working with you and your officials to discuss how CITB-ConstructionSkills Wales, and our regional fora, can work in collaboration to support a regeneration strategy which delivers maximum benefits for Wales.

Yours sincerely,

Wyn Prichard

Director, CITB-ConstructionSkills Wales

87. Alun Carins MP

Dear Minister,

Further to my meeting with you in December, my purpose in writing is to submit my comments on the Regeneration – Vibrant and Viable Places consultation, following a number of local meetings, letters and requests from constituents.

I understand that the Welsh Government aim to reduce the number of regeneration areas from seven to three or four. My general concerns are:

- The Barry Regeneration Area will cease to exist in April 2014
- The Barry Regeneration Area Partnership Board will have no funding and as such it might as well be disbanded; unless it is retained as a talking shop.
- Regeneration Money will need to be sourced from a South East Region which will consist of no less than ten local authorities. Six of these local authorities are part of the West Wales and Valleys Convergence Area.
- Not only will there appear to be greater need in these areas than Barry but these areas will also have access to significant amounts of European Money which can be used as match funding for regeneration projects. The Vale Council has no money to provide match funding and as such it is highly unlikely that Barry will receive any money at all from the new Region.
- The previous Council Administration secured regeneration status for Barry and £9.8 million pounds has been invested in the town. Much has been achieved and there is now significant private sector investment and interest in Barry.
- The development of Barry Waterfront has started and planning permission sought for the new road access to Barry Island. There is the Innovation Quarter with the refurbishment of the historic Hydraulic Pumphouse, the new Premier Inn Hotel and Restaurant, the scheme to transform the Magistrates Court, the new Extra Care Facility being built at the former Theatre Royal and the plans to redevelop the Funfair Site at Barry Island.
- Despite the very difficult economic climate Barry is beginning to make real progress but all this could be put in jeopardy, together with the redevelopment of Nells Point and other schemes to transform the Town Centre, if public sector regeneration funds are no longer available to Barry.

My specific points with regard the consultation and Barry's bid to maintain regeneration status are:

- Barry has seen the same decline as other former mining communities but

had not received specific support to overcome such difficulties until it was made a Strategic Regeneration Area

- A regeneration model based on a regional format will undermine the opportunity for Barry to continue its development. It will not have access to European funds in the same way that other Authorities do in South East Wales. Barry does not qualify for EU money because of relative prosperity a considerable distance away from the town.
- The Vale of Glamorgan local authority receives significantly less funding per person than other neighbouring authorities and regeneration funding has enabled discreet support without the requirement of local authority assistance. Should there be a requirement to 'match' the grant, the low level of funding received by the Vale Council will make it almost impossible to access any money.
- Some people view the Vale of Glamorgan as a relatively prosperous area. However, there are 6 LSOAs (lower layer super output areas) that fall into the top 10% of the most deprived communities in Wales. The regeneration money received over the last 3 years is making a significant impact to overcome such issues. This must continue.
- The recent manifesto document committed to investing in town centres and seaside resorts in particular. This policy ties into the ambitions of Barry but to achieve it, there must be a discreet sum of money, at least mirroring the £9.8million made available over recent years committed specifically to the town. A regional model will undermine the town's ability to achieve the ambitions.

I would welcome the opportunity to meet to discuss the above comments and please don't hesitate to contact me directly if you have any queries regarding my submission to the consultation.

Yours,
Alun Cairns MP
Vale of Glamorgan

88. Arts Council of Wales

The Arts Council of Wales warmly welcomes the ambition, vision and approach advocated by the Minister in his Foreword to the document. This is an important and timely initiative that we wholeheartedly support.

We see many ways in which the Arts Council's activities can support the implementation of the Welsh Government's strategy proposals. The arts have a long history of invigorating and empowering communities experiencing change. At their best, the arts can illuminate and enliven places. They create (or regenerate) strong, cohesive and vibrant communities with a real sense of identity and pride and bring creative flair and vision to projects.

More significantly - in terms of the Minister's ambitions - the arts can also be highly successful at connecting people to the processes and strategies being enacted in their name by public bodies. This is more than just a rhetorical flourish. We believe that there are real and very practical ways of ensuring that regeneration is owned and rooted in the communities that it seeks to

benefit. Sometimes regeneration projects can threaten to overwhelm the very communities that they are intended to reach. (There is some evidence of this in the Appendices to this consultation.) Artists are often able to encourage a level of engagement and participation in projects not seen using other methods. And where it works well, the artist can create the turning point for successful regeneration projects by providing a conduit for communication that is direct, authentic and engaged.

From reading the appendices to this consultation, and with the benefit of our own

experience in managing a large number of significant capital development projects, we would offer the following four points:

1. – there is no substitute for high quality strategic planning from the initial conception of any major regeneration project. And the value of cross sectoral working from the outset has proved its worth time and again.

As you might expect, we strongly advocate the value of embedding artist(s) as part of the design team from the outset of project planning. Such a proposition can sometimes be viewed with suspicion, the commonly held assumption being that the involvement of an artist just brings additional cost and inconvenience. This is a lazy reading of the potential benefits.

– the right artist can transform a regeneration project. This is not about commissioning some piece of decorative public art as an afterthought to ‘beautify’ an otherwise undistinguished building (what Richard Rogers described as “lipstick on the gorilla”). It is about a fundamental belief that communities deserve the best from their public buildings.

There are many ways of involving an artist, of which the production of single standalone objects is just one. There are many successful examples of artists working as a core member of the design team – bringing a different creative eye to design and build, landscape and the built environment, the use of colour, the procurement of fixtures, fittings and street furniture. Appropriately skilled artists can also work within communities, giving those communities a voice, encouraging them to engage and to help shape the projects themselves.

– good design and architecture doesn’t automatically mean additional expense. Clever and thoughtful design can often anticipate problems and find clever and cost effective solutions. For example, specially commissioned fixtures and fittings from a crafts person will often be cheaper than a visit to the builders merchant. And the end product will often have a quality and uniqueness that is distinctive and special. Such an approach has delivered results time and again with arts buildings in Wales (Wales Millennium Centre, Galeri, Ruthin Craft Centre, Aberystwyth Arts Centre, Royal Welsh College of Music and Drama), all of which are able to combine internationally significant architecture with functionality and value for money.

– the philosophy of “build it and they will come” was an approach that always had obvious flaws. Increasingly there is now a greater recognition that successful physical regeneration needs to invest in the development of people. As Tim Smit, founder of the Eden Project said “first find your maniac”. It is the passion, the vision, the energy, the cussedness of the charismatic

individual, the engaged community, that makes things happen and sustains them.

There are many different ways that the arts can contribute to physical, social and

economic change. The visual arts are most notably associated with regeneration,

emerging from an established tradition of public art. But there are an increasing number of powerful examples of other uses of the arts, including performance and multidisciplinary arts, that have had a catalytic role in bringing together new and existing communities in a positive and meaningful way. National Theatre Wales' The Passion in Port Talbot was a compelling example of how the arts can mobilise the engagement and the pride of a whole community in ways that made front page news all round the globe. World famous in Port Talbot.

More broadly, we support the kind of creative cross sectoral partnership working that is advocated in the report. To share is to learn, and to draw strength from the knowledge and experience of others.

But cross sectoral working must be driven by a clear understanding of the special

characteristics and benefits that each sector is bringing to the table. With significantly less public funding anticipated in the future, the need to concentrate on bringing the best of our experience and knowledge in regeneration - across all sectors - to bear on tackling the significant issues we face collectively in Wales is paramount. This will mean working inclusively on the basis of mutual respect and trust – possibly with unlikely partners. We embrace our part in that challenge. We believe our sector has an important and positive contribution to make.

However, emerging structures need to look at behave differently to what currently exists.

Embedding principles of collaboration and creating models that work on the basis of mutual respect, trust and inclusivity will need changes in outlook and behaviour. Because if they don't, nothing significant will change.

We acknowledge a growing cultural shift away from an over-dependence on conventional resource led approaches to regeneration and are keen to play a key role in liberating more imaginative and inclusive regeneration design, planning and delivery. We believe that there is a growing body of evidence to support an engaged and intelligent approach that brings together the best of practice from fields such as academia, the arts, community development and the third sector together with that from the more usual regeneration models to truly assist

and support our struggling communities.

The Arts Lottery Capital programme has, with the support of the Welsh Government and other funders, transformed the cultural landscape in Wales and provided the country with a high quality network of venues for the 21st century. Since it was established in 1997, a total capital spend of £115,550,783 has been successfully managed by the Arts Council of Wales. All parts of Wales have benefited from capital investment and we are proud of our record in capital management. We believe we have had a significant impact on regeneration in Wales through the programme – some notable

examples include Galeri Caernarfon which has been transformational – both in its sector and in its locality, attracting attention from the cultural and public sector all over Wales and beyond. It has influenced thinking by providing a new model for arts and cultural enterprise. Ruthin Craft Centre is another exemplar project, providing a major, high quality venue for contemporary crafts in a small market town, built on many years of successful development. Theatr Mwldan has made a step change moving into co-production with a variety of theatre companies and music groups which have gone on to tour extensively in Wales and England. Aberystwyth Arts Centre has experienced exceptional growth in its activities, scale of operation and attendances. Many of our projects have gone on to receive architectural and design awards and we have pioneered the concept of including a project artist on capital scheme design teams to considerable acclaim.

Such models are often physical regeneration led but significantly citizen focused in their approach. Examples in Wales to date that we would highlight would be:

The capital investment into Galeri itself proved to be the tipping point in the successful regeneration of Victoria Dock – and you could argue Caernarfon itself. A vibrant arts building with a significant multi million pound turnover is an obvious economic driver in terms of employment and also in supporting local businesses such as suppliers and hospitality. But fundamental to Galeri Caernarfon from the very beginning of the planning stages was its ambition to engage the local community. This came from their overarching ambition as a town development community interest company charged with the regeneration of Caernarfon itself, not just developing a new arts venue.

A community arts development plan was put in place in tandem with the capital

development plan right from the outset and this, in our view, paid huge dividends. The ambition to make themselves relevant to all sections of the community of Caernarfon has informed and indeed enriched their business planning from the very beginning. They have, quite rightly, received numerous national awards - not only for the quality of their architecture and design – but perhaps more significantly in terms of this consultation, for their community development work as a community interest company.

They have certainly created life changing opportunities for the residents of the poorest areas of the town. They were also a major catalyst in a larger physical renewal project of the dock area with an £8m building designed by one of Scotland's leading contemporary architects, Richard Murphy. They have added to the tourist offer in the town and enabled some stunning artistic work and events all of which contributed to making Caernarfon a vibrant and culturally lively town. On an economic basis, every £1 of grant invested in Galeri generates £9.65 for the local economy (Arad Consulting Galeri Economic Impact Report).

In a project enabled by the Cultural Olympiad, artist Owen Griffiths, took over a small corner of the old Swansea City Football Ground, the Vetch, after it had been vacated and relocated at the new Liberty Stadium. This project demonstrates all the characteristics of the emerging profile of a successful

regeneration project: cross departmental working, super local, green and sustainable and people focused. The project has been hugely successful in engaging local citizens, encouraging them to grow their own food, come together as a community to share food and arts events and develop community capacity and resources. It has created a shift in attitude and a desire and capability within that community to self-organise. Local people have attained a more sustainable, and higher quality, way of life and their health and wellbeing improved – all in addition to what would have normally been the sole focus of an arts project – to create a beautiful shared community garden and space.

Both of these examples and others of good practice of which we are aware tend to share the following characteristics:

- A healthy respect for the community in which they are operating. They are people focused.
- Sufficient time and resources given to the planning/feasibility stage to fully explore the partnership potential.
- A fully formed and respectful understanding of the fundamental importance of good creative design in public engagement terms and its integration from project conception.
- Recognition of the role of cultural activity as a catalyst for regeneration and bringing life and vibrancy to an area making it attractive for further investment.
- The increasing importance of creative skills to the economy in the modern world.
- That the arts are part of a successful creative and cultural sector that not only create jobs and wealth in themselves but also underpin a related economy of goods and services.
- They have the potential to boost tourism – particularly through a link with the heritage sector - and raise the country's profile and perception world wide.
- An approach to regeneration that seeks to create sustainable communities – not only in the environmental sense - but rather as social/cultural sustainability where citizens have a stake in the future and efforts are made to engage and empower local people ensuring that the regeneration 'dividend' is equally felt across the whole community.

We agree that partnership working is often facilitated by a geographical focus. We have experience of this working positively in our own sector. It can however lead to frustrations when boundaries do not reflect perceived communities such as Welsh speaking communities or marketing 'tribal lines' to centres of focus such as market towns or ultimately follow common sense principles.

We largely agree with the strengths and weaknesses of the Regeneration Areas approach and can see the arts sector having a major contribution to make to all 5 bullet points in relation to the strengths. We would add one - the third sector (in particular the arts and creative sector) to the last bullet point in the weaknesses.

We offer two other principles for consideration:

We would encourage the embracing of creativity and innovation as one of the principles.

Creativity will permeate all areas of business and activity in the future. Creativity reaches beyond the realm of arts and culture, though they are its natural and necessary nurturing ground. Creativity is a skill that can be used to bring innovative solutions to familiar problems and encourage new ways of thinking across all sectors. The successful economies of the future will be those that can capitalise on their creative potential. It has many positive benefits, helping income generation, growth and employment to enabling social inclusion. It puts people and skills – human capital – at its core. In today's society, this is as critical as any other economic resource.

Whilst the term appears several times in the document and is implicit in its importance, we would encourage the broadest interpretation of the term. A truly sustainable community is one where the citizens have a stake in its future and the community can sustain itself in every sense of the word.

Inequality is the enemy of true sustainability so we should be aiming to build local

confidence, skills and capacity by working alongside individuals and communities to enable them to find their voice and unlock a new dimension of experience that would otherwise not be accessible to them for many reasons. As Dr Margaret Wheatley, the renowned management theorist says “there is no greater force for social change than a community discovering what it cares about”.

The holistic process of building sustainability in a community can be a long term game although evaluation processes are more short term in perspective and this can be a barrier to identifying what is making a positive difference.

We are supportive of the outcomes that are outlined in the document. However, we would naturally like to see arts and cultural activity more specifically recognised in all three sections.

We would particularly suggest the following additional narrative under the section heading Prosperous Communities:

A well managed historic, natural and rich cultural environment contributing to the distinctive character of Wales' landscape and towns with heritage conserved, interpreted and developed.

We would like Welsh Government to take a pioneering and distinctive approach to embedding creativity at an early stage of planning and development of any major investment project.

There is no specific sectional reference to the arts in 6.1. As part of the sectors covered in the Ministry for Housing, Regeneration and Heritage, we would recommend a paragraph on the contribution of the arts and other cultural sectors (such as sport).

We would encourage the creation of partnerships that are based on a shared vision and not solely reliant on artificially conceived budget constraints. This should be driven by best practice and a philosophy based on a bespoke approach, creating an appetite for innovative approaches to problem solving. In our view, a national ambition should set the framework for Wales. This should outline national themes and principles that are then developed and delivered locally. The three layers of strategic planning need to work hand in glove and create a clarity of vision and purpose that will enable officers to work productively on the ground.

We note that the proposal here is for 3 regions. The WLGA Chief Leisure Officers (CORL) have decided to work in 4 regions across Wales. For cross cutting agencies ourselves there is a compelling argument for consistency with these regions otherwise it can create capacity issues in terms of servicing meetings, etc. That said, if there is a compelling business case for this then solutions can be found. After all, the boundaries in and of themselves are an artificial geographical concept.

We would also recommend that the managing groups – at all levels – include representation from the private, third and cultural sectors. Membership of these groups is crucial and they should demonstrate a broad range of relevant skills. These should include national overview and relevant specialist expertise, in addition to a track record of identifying and investing in successful regeneration projects. Membership should simply be a sinecure, appointed by virtue of a person (or organisation's) profile in a particular locality. This would demonstrate a commitment to a truly inclusive approach to strategic economic planning and show leadership and commitment to the principle from Welsh Government themselves.

The Arts Council of Wales' Enterprise and Regeneration team would be keen to

represented at national, regional and local level – particularly the Ministerial Advisory Group where we believe our track record and approach would be an asset. We are also keen to continue our embryonic but extremely positive relationship with CREW and believe that we can develop that partnership in inspirational ways.

We are supportive of the proposals and see many areas that can be enhanced and improved with arts partners' involvement. It would be important to ensure that, where projects are financed by several partners and sources, that these do not compete with, or counter one another. This is where the Welsh Government has a crucial leadership role. We are supportive of the approach.

CORL have, though the WLGA supported a similar approach. That work has taken as its outcome the improved health and wellbeing of the citizens of Wales (in its holistic sense). If this regeneration work is to be truly cross cutting and joined up, it would make sense to adopt a similar approach otherwise there could be a danger of one half of government pulling in a different direction to the other. We are convinced and comfortable with the health and wellbeing outcome (as described in this document as a sustainable healthy community) driving the Regeneration RBA and believe wholeheartedly that the arts can contribute in an inspirational way.

89. Neath Port Talbot Homes

NPT Homes Limited (NPT Homes) is a new Community Mutual Housing Association, established to receive the transfer of the social housing owned by Neath Port Talbot County Borough Council. This is made up of approximately 9,200 rented homes, 600 leasehold properties and 800 garages. The transfer took place in early March 2011 and on transfer NPT Homes became one of the largest social housing providers in Wales.

NPT Homes has been incorporated as an Industrial and Provident Society and is regulated by the Welsh Government. Charitable status has been

granted by Her Majesty's Revenue and Customs therefore the organisation is an exempt charity under Industrial and Provident Society legislation. The Company has a turnover in excess of £33 million and during the first six years it is expected that £220 million will be spent on improvement and related works to bring the homes up to Welsh Housing Quality Standard. In the pre-ballot phase, the Shadow Board and NPT CBC recognised the unique opportunity presented by transfer to maximise the economic benefits of the overall programme of investments.

The Offer Document stated that:

NPT Homes would aim to provide more local employment opportunities;

NPT Homes would aim to create more apprenticeship schemes;

NPT Homes would maximise investment in the local economy;

NPT Homes would use social clauses;

NPT Homes would support local enterprises;

NPT Homes would regenerate local communities in partnership with local bodies;

NPT Homes would enhance the environment within which the communities we serve are situated;

NPT Homes would increase the participation opportunities for individuals and communities both within the organisation and locally.

NPT Homes welcomes the vision of this consultation document in recognising that previous approaches to regeneration in Wales do not necessarily provide a successful approach in the current UK and global climate. The document recognises that the emphasis on people and places will have greater success rate on the regeneration of Wales rather than a simple reliance on inward investment or larger scale, high profile capital projects. It is welcomed that the paper makes strong connections to the sustainable and resilient communities' agenda. The focus on poverty, improving health and educational outcomes is welcome, providing a target area that brings a focus to partners in order to deliver joint outcomes. Also welcome are the strong connections to the Welsh Government's "Tackling Poverty Action Plan" and aligning regeneration goals with European Programmes 2014-2020.

This leads to the laudable intent to build in regional coordination including spatial planning. However, the paper does not provide guidance on how this is to be achieved. A regional approach is undoubtedly required to complement a "people and places" approach. This has been displayed with some success in the seven Regeneration Areas. However, in order to ensure that the regional boards operate at an optimum level will require careful consideration with partners. In order to facilitate this approach, it is suggested that the Local Service Boards have an invaluable role to play within the regional environment. The LSBs bring together key strategic partners, together with the capability to make coordinated decisions and establish

priorities. It will be vitally important that partners at a regional and a local level share data and information in order to achieve common goals and outcomes.

The paper mentions “housing-led” regeneration. Registered Social Landlords, particularly transfer organisations and the new Community Housing Mutuals, play a vital role in the regeneration of their local areas.

The role of the Community Housing Mutuals cannot be over emphasised. The paper relies on regeneration agencies making the connections between large regional areas, smaller, but not inconsiderable Local Authority boundary areas, local areas and local partners and people. Community Housing Mutuals are constitutional based within the community. They are, by their nature, third sector regeneration agencies. They have spent, or are spending, considerable sums of money directly on local communities. They have the capacity to make the links between regions and local communities in a way that is probably only equalled by Local Authorities. They were in the vanguard of the approach taken by i2i in the “Can do Toolkit”. The efforts in retaining housing investment within the local economy have been impressive. They and other Registered Social Landlords are key in developing services “for those who find it difficult to access mainstream programmes”. They carry out key activities which have a direct impact upon economic prosperity, health and education. We welcome the fact that housing and housing organisations are acknowledged as increasingly important partners in delivering major projects in local areas. They are key to ensuring that community-led regeneration is supported and enabled in the context of national goals and local levels of delivery.

1. What is your feedback on lessons learned from Delivery to date?
 - It is vital that importance is placed on baseline data. In order for the monitoring and management arrangements, as outlined in the document to be successful is necessary to develop a robust baseline of evidence.
 - It will be necessary for organisations to develop sophisticated management information systems to capture outputs, outcomes and impacts.
 - It will require investment by organisations to build local and regional partnerships and ensure the sharing of regeneration skills. Some work has been undertaken in this area but this could be greater enhanced and improved. Bodies such as CREW (Centre of Regeneration Excellence Wales) should be supported to ensure the spread of good practice and learning
 - The establishment of clear governance arrangements which are transparent are recommended. The arrangements must ensure that community engagement is linked to strategic long term planning.

2. Should other national outcomes or principles be considered?

The intent to align the framework to the Welsh Government’s Communities First Programme as a place based anti-poverty approach is welcomed.

3. What more can be done to achieve greater coherence and cross cutting action across departments?
The emphasis on a holistic government approach to regeneration is appreciated. Greater clarity would be welcome on cross cutting departmental coordination between regeneration programmes such as Communities First, economic development and capital regeneration. In turn this will help resolve the inherent tension between the need for regeneration in a placed based approach as opposed to the opportunity for regeneration.
4. Do you agree with the national, regional and local approach set out?
An approach which encapsulates the various geographical layers involved in regeneration is welcome. However, the nature of the Regional Boards need careful consideration, particularly as they seem to include areas, with little or no economic, social or heritage attributes in common. It is by no means clear how the involvement of the third sector, public sector and private sector would be coordinated by the Regional Boards. As commented upon in this response, the involvement of Local Service Boards may be key in establishing a robust governance arrangement.
5. Do you have any other comments on our proposals for how we will target and direct our funding?
Results Based Accountability (RBA) is a robust way to proceed as it ensures that projects are outcome driven. This coupled with a sound evidence base which leads to a robust business case would be an appropriate way to proceed. However, the consultation is unclear on how the tension between regeneration opportunity as opposed to need would be reconciled, neither is it clear as to the role of the Regional Boards in relation to the establishment of priorities and allocation of funding.
6. We want to ensure effective monitoring and evaluation of regeneration activity. Will the approach set out achieve this?
As mentioned previously RBA is a robust way to proceed. Once an outcome is established, rigorous and regular monitoring must be put in place by all those involved to ensure the outcomes are met. It is critical that a common approach (or a common understanding) of RBA is shared by all partners and are utilised by all. Management information must be easy to collect, accessible and understandable to all partners. It is unclear as to the role of the Regional Boards in relation to monitoring and evaluation. The consultation paper recognises that the “people and places” approach is a complex multi-agency approach to regeneration. Therefore, it must also be agreed that real outcomes may not be achieved for a number of years. The systems put in place must allow for the monitoring of trends and deviations.

90. Torfaen CBC

Vibrant and Viable Places – New Regeneration Framework Consultation Document

Torfaen County Borough Council Response

General Comments

1. We welcome the general principles of the Framework and support the thinking behind it. We particularly welcome the greater links being made around Housing and Regeneration and the general Homes and Places agenda. However, we do not think there is sufficient consideration in the main document of more radical, innovative approaches that really respond to the unprecedented funding pressures facing the public sector over the next 5 - 7 years. In addition, it is important that activity is co-ordinated and links are made, so that work is not done in isolation.

The Case Studies in the Appendices make reference to models which have been developed outside the public sector; for example, the New Deal for Communities Partnerships whereby the Local Authority was the accountable body but independent bodies, such as Development Trusts, were the delivery agents. Conclusion 17 specifically states that 'creation of a specialist delivery body can facilitate partnership, broker relationships and release energy for innovation and action. Distance from government and local government can facilitate decision making and delivery.'

This does not appear to be picked up in the framework particularly strongly beyond basic partnership working with the 3rd sector. We welcome engagement in the third sector, but have concerns about the ability to utilise and engage with the sector. It is suggested that there should be more consideration as how to develop and strengthen these models, especially in building community capacity for regeneration delivery, utilising opportunities through the Enterprise Facilitator model and programmes such as Taste of Enterprise. We would suggest that serious consideration is given to supporting and extending the Enterprise Facilitation model to a small pilot regional rollout.
2. The formal establishment of the south east Wales City Region would have significant implications for statutory planning, the role of local town centres, governance arrangements and funding. Whilst there is still uncertainty around the impact of the City Region on Local Development Plans, it is difficult to regard the Framework as a medium to long-term strategy.
3. Whilst the importance of the natural environment is recognised in the proposed National Outcomes, the document should make more reference to the inclusion of green infrastructure and ecosystem approaches as part of the regeneration agenda. Green infrastructure has provided a strong sustainable tourism platform for communities and regions in South Wales, providing jobs and economic success. It should be recognised that a well developed and managed green Infrastructure must play a key role in regeneration in Wales and that this will support the economic growth of communities in the future. South East Wales has outstanding areas

natural beauty and distinct landscapes of strong local character. This has assisted in creating a stronger regional identity and provides a natural resource around which to plan and deliver sustainable growth for future generations.

It should be acknowledged that our environment attracts businesses and private sector investment. The urban areas are surrounded by a diverse hinterland that offers a unique quality of life for its residents and a strong incentive for businesses to locate and invest in the area.

It is important to invest in and plan for green infrastructure in order to be able to address the growing challenges of climate change. High quality green infrastructure development and management should be considered with the other priorities such as Housing, Transport and Employment to drive sustainable economic growth.

4. Likewise, whilst the importance of the heritage, the built environment and cultural activities are recognised in the document, their fundamental role in helping to create a sense of place for local inhabitants, as well as creating a high quality context to attract inward investment, does not come across strongly in the document. This is especially the case for smaller town centres where much of the case study and research evidence supporting the Framework identifies the need for diversity beyond retail provision alone. Torfaen County Borough Council is already developing a 'Town Team' approach in Blaenavon, as proposed in the Portas Review. Furthermore, the Council is working in partnership with Newcastle University to use Pontypool as a pilot town in Wales (alongside Hexham in England and Dumfries in Scotland) to explore the role that cultural activity can play in the regeneration of towns described in the research as 'In Between' i.e. generally smaller towns that are neither strictly urban nor strictly rural. The project has led to the Arts Council for Wales supporting an Artist in Residence project based in Pontypool Indoor Market which seeks to identify and encourage community influence and participation in developing cultural activity in the town to create both the sense of place and community capacity building which are key factors in the regeneration of the town.

It is also surprising that there is no mention of the Heritage Environment Strategy for Wales in the Framework bearing in mind the role the heritage sector can play in providing skills development and training through volunteering, as well as economic benefits through heritage-based tourism.

Whilst the Framework appears to place a good deal of emphasis on the importance of town centres, it is a concern that some information from Welsh Government suggests that there will be a presumption against funding for heritage, culture and the natural environment – the very elements that will help more vulnerable town centres achieve greater diversity and resilience to market changes in the retail sector. It is therefore important that Welsh Government clarifies its approach to funding these areas, if only to help Local Authorities and other organisations leverage funding from other sources such as the Heritage Lottery Fund.

5. The digital agenda should be more explicitly recognised as underpinning all regeneration activity. For example, IT is only mentioned in the context of Outcome One: Prosperous Communities. Digital technology is also absolutely key in helping to deliver Outcome Two: Learning Communities and Outcome Three: Healthier Communities. Similarly, green technology should be positioned as more of a cross-cutting theme underpinning all of the proposed Outcomes.
6. The document should be more explicit that the Wales Infrastructure Investment Plan will have to be financed through new mechanisms, potentially utilising borrowing powers of partner organisations such as RSL's. There is therefore no guarantee that the whole Plan can be delivered.

Specific Comments

Chapter 3 – What has changed and where are we now?

Consultation question: What is your feedback on lessons learnt from delivery to date?

- The Heads of the Valley boundary does not reflect the actual relationship between, and use of, town centres and surrounding communities. For example, Pontypool is the key town centre for providing services and facilities to the communities of north Torfaen, although it is not formally within the Heads of the Valleys boundary. Fortunately, Welsh Government has shown some flexibility and recognised the importance of supporting some initiatives in Pontypool which bring wider benefits to the communities within the Heads of the Valleys area. We would welcome more flexible criteria for Regeneration areas, as the current criteria is too specific.
- With the reduction in Welsh Government funding and Local Government budgets, finances to support the development of regeneration schemes is becoming increasingly problematic. As a result, there is less ability to have ready 'on-the-shelf' schemes that can respond to ad hoc funding opportunities with short delivery timescales.
- We have some serious concerns about annualised funding, as it can be difficult to get schemes fully up and running and spend the funding in the 12 months, especially if there are delays as a result of local conditions and other considerations.
- When leveraging additional investment, we feel it is important that there are more links made between schemes, e.g. energy efficiency schemes are often implemented in isolation. Some of these issues are as a result of an over-prescriptive approach to funding which cater to immediate need rather than taking into account likely or planned future development.
- Better integration is required between Heads of the Valleys, Targeted Match Funding and European funding to enable funds to be optimised. This is particularly the case where there may be differences between funders in terms of eligibility criteria, desired outcomes/outputs and application processes. In terms of the latter, a more streamlined application across all three funds would be a major improvement. We would like to see a strong commitment to integrating the framework with

the next round of European Structural Funds 2014-2020 to ensure maximum benefit for communities.

- The document recognises insufficient involvement of the private sector – however it does not offer reasons or solutions for addressing this. If key reasons are length of time before return on investment or perceptions of bureaucracy in obtaining public funding, the Framework ought to address these.
- The Framework still appears to place significant expectations/responsibility on Local Authorities to lead delivery. Clearly, this will become increasingly difficult over the next few years unless resources are made available. In addition, the Framework identifies the third sector as key partners – however, in Torfaen the third sector is still very much in its early stages of development, particularly in having the capacity to plan and deliver regeneration activity. It is suggested that some kind of transition funding is made available to Local Government to help develop specific regeneration capacity in the third sector, as well as considering how Enterprise Facilitator and Taste of Enterprise models could be used to support this.
- Whilst there are benefits to targeting funding on deprived communities in the Regeneration Area approach, there needs to be an understanding that opportunities for employment, skills and training frequently lie outside these areas. Connections in terms of transport (particularly public transport) and IT are critical in this respect. In Torfaen specifically, Cwmbran and the south of the borough is the key economic hub, whilst the Heads of the Valleys Regeneration Area is located in north Torfaen. However, funding boundaries mean that it is difficult to provide a fully integrated approach in connecting the area of need (north Torfaen) with the area of opportunity (south Torfaen). It is suggested that further consideration is given to addressing this issue – particularly funding to connect employers in the economic hubs to the communities in more deprived areas. Perhaps programmes like Taste of Enterprise can be utilised as a means of brokering such links.
- Whilst Regeneration Areas have had a significant positive impact on the physical environment, consideration of further integrating ‘softer’ regeneration activity such as skills and training programmes into the area-based approach is welcomed.

Chapter 4 - Our Vision and Outcomes for Regeneration

Consultation question: should other national outcomes or principles be considered?

- The definition of regeneration should also include reference to ‘ecological decline’ so that the definition of integrated activities includes a holistic approach to ecological, landscape and biodiversity enhancement and lasting improvement.
- The principles and outcomes are wide ranging and cover a variety of issues, however, they will only be successful if a joined up approach is adopted to coordinate them.
- Outcome One: Prosperous Communities - the following should be added to the range of outcomes

- People are meaningfully engaged in the Regeneration of their communities and are willing to volunteer to make improve their environment.
(Volunteer activity is an excellent way for communities to become empowered and engaged).
- A well developed and managed Green Infrastructure which can provide the setting for prosperous communities to thrive.
- Outcome Two: Learning Communities contains two outcomes which appear to be focused on changes in cultural behaviour and attitude, namely:
 - A high aspiration local culture
 - A belief in a better future

These are very long-term outcomes and will be difficult to monitor. However, perhaps a key factor in moving towards these outcomes will be enabling generations of long-term unemployed within families and communities to gain employment through training, mentoring and support. It is suggested, therefore, that a more targeted outcome along these lines may be more meaningful.

- Outcome Three: Healthier communities - the following should be added to the range of outcomes:
 - Communities are able to access their natural environment through a network of high quality routes
(There is an increasing body of evidence linking health and wellbeing to access to natural environments and has significant benefits for mental health, reduction in obesity and reduction of some types of diabetes)
 - A healthy landscape and ecology will help to support a healthy community.

It is important to recognise that aftercare and maintenance of Regeneration schemes are vital to the long term sustainability of town centres and green spaces. If areas are well managed they are likely to be well used and provide significant benefits for the community. Consideration should be given to the issue of fuel poverty as a constraining factor in achieving a healthy and prosperous community. A reduction in energy costs to residents through shared energy schemes solar, hydro etc. will help to address this. Business will be more resilient if the community has more disposable income to spend locally as a result of lower energy costs, and can benefit directly from energy efficiency improvements to its trading premises, reducing its own costs and providing greater financial stability in a period of economic uncertainty.

Chapter 5 – Our Principles for Regeneration

- The document refers to ‘innovation and creativity’ in relation to the principle of working in partnership. However, this requires willingness on behalf of Welsh Government to accept the risks, and potential failures, associated with supporting innovation and creativity.
- It is not entirely clear what is meant by ‘genuine’ involvement of communities – however, this tends to suggest a long-term commitment which will be very resource intensive and will require appropriate levels of funding, As a result, there is a risk that this may result in this level of community involvement only being feasible in Communities First cluster

areas, which would significantly reduce the ability to respond to opportunities which could arise in other areas. The reality is that some communities have much greater capacity to become involved in regeneration activity than others, although there is much to be gained from communities within the same locality learning from each other.

- There is a clear need to develop regeneration capacity within communities but this requires a long-term commitment with associated funding.
- In order to plan for sustainable regeneration adequate time and resources must be allowed for feasibility, options consideration, development, community engagement etc. This can be neglected leading to rushed and uncoordinated regeneration activity, which has the potential to be exacerbated by the proposed annualised funding approach..

Chapter 6 – Our New Regeneration Framework

Consultation questions:

What more can be done to achieve greater coherence and cross cutting action across departments?

Do you agree with the national, regional and local approach set out?

Do you have any comments on our proposals for how we will target and direct our funding?

We want to ensure effective monitoring and evaluation of regeneration activities, will the approach set out achieve this?

- In order to achieve greater coherence and cross cutting action across departments we suggest the following should be considered:
 - There should be more incentives, rather than legislation.
 - A lot of work is carried out on a regional basis, but this is not always fed back and so duplication occurs.
 - Greater emphasis is needed to promote the wider benefits of housing and regeneration to other policy areas such as health, education, wellbeing.
- In ensuring town centres are sustainable it is important that the private sector is proactive in bringing vacant and dilapidated property back into use. Greater incentives, particularly for absentee landlords, to address problem properties should be considered.
- The proposed review of business rates policies is welcomed – greater freedom for Local Authorities to vary business rates according to the needs of business and town centres would be beneficial.
- Good public transport is critical, particularly in areas of low car ownership, for accessing employment, cultural and community services. Frequently, privately run services only run on profitable routes or at profitable times. With pressures on transport subsidy budgets, this has meant in Torfaen that, for example, many people are unable to access services and facilities in the evening which, in turn, undermines the potential for town centres to diversify their offer. We welcome the themes of the framework and support the idea of making better links between Housing and Regeneration. The Ministerial advisory group is also encouraging and this will help to raise the profile of the work on a political level. There needs to be greater co-ordination between housing and Regeneration, so a national governance structure/framework would help to achieve this, which hopefully can be replicated on a local level, so services and

departments are better linked. However, it is important to recognise the limitations that exist locally which can influence how much housing and regeneration are able to achieve. Therefore, we feel the proposed regional approach needs greater clarification. How would the new regional boards relate to existing regional partnerships and structures, some of which have different boundaries? There is no mention of how the membership of regional regeneration boards will be determined or how their relationship with Local Authorities will work. There is a risk that the proposed structure will generate additional bureaucracy and duplicate existing regional working. Consideration should be given to utilising current structures and partnerships where possible. However, it is also important that the approach is not too 'top-down' and that there is still sufficient independence and flexibility for decisions and action to be taken at a local level.

- Landscape and ecology are also key factors in determining the historic character and sense of place and this should be recognised in the document.
- Funding for regeneration activity must become longer term partnerships between Welsh Government and delivery organisations. Funding all too often comes late in the financial year with extremely tight timescales leading to rushed regeneration activities. There are many sources of funding and they overlap or do not link up. Grant aid from Welsh Government should be more coordinated, focussed, simpler and more strategic. The previous Section 15 grant aid for environmental improvements was an excellent example of partnership working allowing delivery organisations to plan long term for regeneration activities.
- There are some concerns about the design criteria, with Local Authorities putting proposals together, which raises concerns that those that put in the greatest number or the most successful bids will receive the funding, as opposed perhaps, to those areas that most need the funding. The formula needs to be robust to deal with this.
- Further clarification would be welcomed around the funding streams, which are not currently clear and it would be good if the Local Authority could be engaged when setting the robust criteria, as we would have the expertise and knowledge to know what will work locally. Such an arrangement would be welcome.
- We would ask the WG to be mindful of the other changes occurring in Wales and the UK around the Housing White Paper and Welfare Benefit Reform, which will have massive impacts and will result in wider economic effects, if funding streams start to be shifted.
- Successful places should also have a low environmental impact on the environment, seek to reduce carbon footprint, add value and protection to the landscape and ecology in which they sit, provide a healthy environment for people to live and play, be 'connected' and have a plan to combat climate and global economy changes to be more resilient against negative change.
- It is suggested that the list of interventions in successful places should also include strategic regeneration corridors such as the Brecon and Monmouth Canal. There are significant opportunities to deliver integrated regeneration benefits in relation to the canal in terms of transport;

ecology; recreation; tourism; cultural activity; development of adjacent sites for housing, commercial and cultural use; protection and enhancement of heritage and environment; training and volunteering. In many respects, strategic regeneration corridors share the characteristics of the proposed Local Growth Zones but have the added benefit of providing strategic connections between a range of different sites and locations including, in the case of the canal, at a sub-regional level.

- Evaluation should include local and regional impact on the natural environment and biodiversity. Benefit to biodiversity should be part of the Results Based Accountability.
- Where possible, a common approach to evaluation of regeneration activity should be agreed between key funders rather than each funder having separate requirements. The proposed regional boards could play a key role in 'joining up' evaluation and analysing and disseminating regional-level results. It is essential that sufficient time is given to enable full evaluation of regeneration outcomes which can take many years to emerge. If data needs to be collected it must be realistic and not duplicated, if it is to be reflective of what is being delivered, since many data collections are not. It will also be important to let Local Authorities know in advance what monitoring criteria is required, so this can be factored in from the start and we would welcome an approach where the Local Authority has some control over the measures.

91. Western Valleys RA Board

Western Valleys Board response to the consultation
Monday 13 January 2012

Jayne Stokes gave a presentation to the Board highlighting key areas within the consultation on the review of regeneration. Key messages, new proposals and key principles were noted together with references to the evidence available on the Welsh Government website.

It was noted that strong delivery models, including public, private and third sectors, would be required locally, regionally and nationally, taking a balanced approach to regeneration, supported by cross-government department working.

1. Board members debated and discussed some of the key questions and issues raised in the presentation. It was noted that Welsh Government would welcome a collective response from the Board, although it was noted that individual organisations represented at the meeting would have submitted their own responses.
2. Of particular note were the following questions and comments:
 - How would this fit and demonstrate a joined-up approach with the Regional Strategy for south west Wales, the City Regions plan and the Communities First planning process and framework? Some felt that there are many 'givens' which are not included in the review document.
 - How will local needs balance and interface with regional and national needs?

- There is strong recognition that the sum of money to be made available is proportionately small given the all-Wales geographic remit. A joined-up approach would be strongly supported in order to achieve greater impact. Local Service Boards could play a significant role in the joining-up process and ensure that localism is balanced effectively alongside regionalism.
 - A quota system could be introduced to help protect local interests as well as longer-term regional priorities.
 - Structural overload was felt to be a barrier to achieving joined-up approaches and outcomes. It was felt that Welsh Government needed to provide a lead in this by, for example, aligning budgets across departments.
 - It was felt important not to create high expectations especially within communities and to maintain strong local control within the context of wider regional cooperation.
3. The number of different spatial boundaries was felt to be a hindrance in planning for regeneration. All agreed that an effective strategy based on coherent boundaries is needed.
 4. It was agreed that relationships had been strengthened through the management and implementation of the Western Valleys programme and that this made the region well-placed to respond positively to the review. It was further agreed that with jobs and prosperity as current key priorities, these would provide a solid base upon which to build in any new framework.
 5. It was further agreed that the private sector needs to be more effectively engaged in future programmes and processes.

92. Lynette Grey Enterprise in the Valleys

Response to consultation document, Vibrant and Viable Places
January 2013

Response by Lynette Grey, Project Manager, Enterprise in the Valleys

What is your feedback on lessons learnt from delivery to date?

I am responding within the context of our project Enterprise in the Valleys. Our project, Enterprise in the Valleys (2010-2013) was funded by the Western Valleys SRA and Communities First Outcomes funding. It was a development project delivered in 17 Communities First wards across the Western Valleys across five Local Authority areas.

The project exceeded targets and expectations and was a successful example of the following:

- Joint working between WVSRA and Communities First
- A sub regional approach to regeneration
- Cross boundary working across five Local Authority areas

- Local delivery – delivered in the heart of communities meeting local needs
- An example of ‘programme bending’ which met priorities of WVSRA and Communities First

What were the key success factors?

- WVSRA took the lead on the project engaging additional support from Communities First. The impact of this was significant and helped considerably when engaging support for the project from partners and communities.
- A good working relationship was established with WVSRA personnel. The value of this cannot be underestimated – it was extremely beneficial when developing activities. It ensured we were delivering according to Welsh Govt. requirements and also it provided a direct link to the Welsh Govt. ‘wider picture.’
- Preparation – planning of the project took over 9 months. Time was taken to inform and engage the support of all those who were going to help us deliver the project e.g. Communities First staff and partnerships. This proved invaluable and good communications were established at an early stage.
- Support of people working on the ground. We could not have undertaken the project without the considerable involvement and support of Communities First staff. Initially, Comm First partnerships were concerned that involvement in project activities would call too much on staff time. Their fears were unfounded as Comm First staff committed themselves wholeheartedly to the project and in some instances, project activities helped them to deliver on other Communities First Action Plan priorities.
- Flexible approach – flexibility introduced into the Action Plan allowed us to respond to emerging opportunities as the project progressed e.g. Enterprise Clubs and New Enterprise Allowance from DWP which was introduced in Mid 2011.
- Individual Community approach – the flexibility also allowed us to respond to each community’s needs. The project framework allowed a choice of activities which could be tailored to suit each community’s particular needs.
- Recognition of Achievement – we ensured that participant achievement was recognised and promoted widely.

Should other national outcomes or principles be considered?

I think the three priorities set out are the right ones and in that order of priority.

The three stated outcomes will help all Welsh Government departments to be involved and deliver a focussed and joined up approach.

What more can be done to achieve greater coherence and cross cutting action across departments?

Could there be a greater harmonisation of processes between departments? Our project was jointly funded by two Welsh Govt. sections. However, there was a considerable difference between their requirements e.g. the format of

the application form and the application process. WVSRA approved the application in February and Communities First the following July. However, the joint funding structure worked well and led to more efficient use of resources.

I think it would be useful to demonstrate to other Welsh Govt. departments on how Regeneration activities can contribute to the delivery of their priorities. The use of case studies and how they relate to other Departments' agendas, for example, the Enterprise in the Valleys project would meet priorities within the Education and Skills Agenda as well as Regeneration. In addition, it would have been really useful if Regeneration projects could work together and there could be greater co-operation and cross fertilisation.

Do you agree with the national, regional and local approach set out?

I agree with the above approach.

An example of a successful approach to regional working is the South West Wales Regional Learning Partnership which covers South West Wales county boroughs and also Ceredigion and Powys. It is a collaboration of relevant organisations including public, education, voluntary and private sector working together to progress the education/skills and regeneration agenda jointly. Experience of the RLP will provide useful information for collation of evidence and mapping during the first year of Regeneration planning in 2013/2014. I hope that the Regeneration activities undertaken under the current system and recognised as examples of good practice e.g. those under Western Valleys would be developed further under the new arrangement and not lost under the new structure. The new regional approach would mean that the Western Valleys SRA would straddle over two regional areas.

Do you have any comments on our proposals for how we will target and direct our funding?

No further comments.

We want to ensure effective monitoring and evaluation of regeneration activities, will the approach set out achieve this?

Accurate record-keeping is key to effective monitoring and evaluation of regeneration activities. I think more guidance could be given on methods of record-keeping to those delivering activities.

93. Cardiff and Vale Health Board

I would like to provide the following feedback on behalf of Cardiff and Vale University Health Board, and the Cardiff and Vale Local Public Health Team of Public Health Wales, for the consultation on 'Vibrant and Viable Places'.

- In general, the approach set out seems to be a very positive one, building on existing strengths
- We would agree that it is important clear outcomes are set for specific regeneration proposals, and these are performance managed to ensure they are achieved. This should be through an agreed set of indicators to measure progress against the outcomes. The RBA approach proposed would support this

- Evaluation is a key component of implementing any regeneration proposal, and we note this is included and recognised
- The necessity to apply evidence from published literature (where it is available), although mentioned, could be strengthened - and funding should not usually be given to projects where evidence actively contradicts the approach proposed
- Involving local communities is essential, as is ensuring alignment and involvement of all key local stakeholders (and their own action plans), including Communities First, the LA, and the Health Board
- On p5, Flying Start is mentioned as a contributor to regeneration; maybe Families First should be included too?
- On p12, Outcome Three: Healthier communities, suggestions for additional outcomes include:
 - Good access to health care facilities, according to need
 - Access to green space and opportunities for physical activity maximised
 - Access to food of poor nutritional value (e.g. fast food) restricted near areas where children congregate (e.g. near schools)
- On p14, Sustainability, include active travel here (it is included later on, we note)
- p27, Evidence based. Suggest:
 - Opportunity and needs of the region (including health needs) instead of Opportunity and need of the region
- We agree with the asset-based approach outlined in section 6.3ii

94. Mid Wales Housing

Consultation – Vibrant & Viable Places – New Regeneration Framework – Issued 22nd October 2012

Thank you for seeking the Association’s opinion with reference to the consultation paper issued on 22nd October 2012. I would comment as follows:
General Overview

In the broadest sense the Association supports the “vision” set out within the paper.

It also strongly supports the principles of partnership, strategy and sustainability espoused. However, it is disappointed that the approach proposed is inherently a top-down bureaucratic solution with little room for real flexibility. In particular, the Association has concerns about:

- Lack of flexibility for bottom-up solutions;
- Profile of housing-led regeneration;
- The dictation of “artificially” constructed regions;
- The tension between evidence of need and opportunities for delivery.

I will seek to address these within the following sections.

1. What is your feedback on lessons learnt from delivery to date?

Mid-Wales Housing Association operates within the widely dispersed communities of Powys and Ceredigion. Its experience to date is that regeneration activities have focused upon areas where statistically there is the greatest concentration of deprivation. Whilst this is understandable, in reality,

it means that Mid-Wales has largely been ignored when it comes to regeneration funding.

There is nothing within the paper to suggest that this is likely to change, and the obvious proposal that local authorities should collate data on which the regional boards can make decisions is likely to simply add a duty upon some local authorities at a time of severe public sector cuts for little real outcome. Indeed, the paper continues to suggest focus should be on areas of high deprivation, and the Association is disappointed that there is no real expectation that such investment should concentrate on achieving sustainable outcomes. At some point WG should consider whether or not continuing to pump money into the same communities year after year is a sensible use of public funds.

2. Should other national outcomes or principles be considered?

The Association feels the national outcomes suggested are appropriate but consideration should be given to the inclusion of outcomes around the Welsh language.

The consultation paper has not considered the results of the census which shows a decline in Welsh speaking within certain “traditionally Welsh speaking” communities.

Given the appointment of a Welsh Language Commissioner, the adoption of higher Welsh language standards and perhaps most relevantly, the importance of the Welsh language to so many of our communities, the Association feels that improving the use of the Welsh language should be a regeneration outcome.

It is also disappointed that the role of housing-led regeneration does not have a higher profile within the paper. Some reference is made to the work of RSLs and the link between good housing and positive social, health and economic outcomes there is little recognition of the unique role RSLs have played in regenerating communities from the bottom-up. Indeed RSLs would be very well placed to utilise any Welsh Government funding to achieve very real outcomes for the communities in which they operate, perhaps facilitating local groups to “regenerate” their own communities.

3. What more can be done to achieve greater coherence and cross-cutting action across departments?

The Association welcomes the aim to achieve greater coherence across departments, but feels this will be very difficult to achieve, as it will require a degree of flexibility which traditionally Welsh Government procedures are poor to accept.

From a housing perspective this can be illustrated within the provision of social housing. It would be relatively straightforward for RSLs to provide affordable housing on town centre redevelopment sites, but clearly this is more costly than untainted green field sites. One might reasonably expect a higher degree of grant support to reflect this higher cost, and encourage such developments from a regeneration perspective. However, the drive to provide more social housing for less grant and the “rule” that alternative grant funding will simply reduce SHG, make the two policies incompatible.

The Association also feels the regional approach proposed will not help, as the “regions” proposed seem to be different to other Welsh Government

regions used for other departmental planning purposes. Furthermore the operational approach taken by other departments doesn't fit the regional approach at all. The most obvious being the approach recently announced by the Minister for Business, Enterprise, Technology and Science to provide a "one-stop shop" for business advice to microbusinesses, where a pan-Wales approach has been adopted.

The Association would suggest that a useful objective for creating coherence across departments would be to define one clear regional approach for all Welsh Government departments and objectives. These regional boards should then have responsibility for strategic planning and delivery across a wide range of strategic objectives.

4. Do you agree with the national, regional and local approach set out?

The Association recognises the need for some kind of regional approach as clearly economic and social issues do not stop at administrative boundaries. But this is also one of the reasons why the Association feels the approach proposed is incorrect.

Not surprisingly the regions defined identify both North and South Eastern regions with sound reasons behind it. Yet the Mid-and South West definition seems less sensible being based upon the broad sense that because the areas are predominantly rural they have the same problems to address, when this is unlikely to be the case in terms of real delivery. For instance, any regeneration activity around Ystradgynlais will have far more in common with Swansea than any other part of the proposed South West Region. Similarly, partnership working with Shropshire and Herefordshire will be far more relevant in terms of economic regeneration to both Powys and Monmouthshire, and Welsh Government appears to have decided economic regeneration stops at the border with England.

The proposed regional approach also is at variance with other regional definitions likely to lead to confusion and waste amongst Council Strategic Planners creating another tier of meetings to attend (see above).

The Association feels that if a regional approach is adopted by Welsh Government then it should be coterminous with other Welsh Government regions so as to minimise bureaucracy and administrative waste.

The Association feels a more sensible approach would be to place responsibility and resources with individual local authorities who should have the flexibility to develop regional partnerships across county and national boundaries where this secures clear outcomes.

5. Do you have any comments on our proposals for how we will target and direct our funding?

The Association strongly supports the "results-based accountability" proposed, and the desire to demonstrate clear outcomes from investment. But it has fundamental concerns about the mechanisms for the distribution of funding, which it feels is unnecessarily rigid.

Given the relatively limited funding likely to be available for regeneration activities, setting funding within a regional framework seems unnecessary. Arbed (Arbed 1 especially) provides a clear model whereby national strategic objectives can be successfully delivered without a regional approach.

Furthermore the regional approach has the potential for diluting the impact of the investment made as inevitably WG will wish to see investment made across all three regions when greater impact might be achieved by focussing on fewer projects.

The Association feels that given the limited funding available local authorities should be able to bid directly for funding from WG, without the need for a regional board. Welsh Government might insist that a condition of funding is that an assessment of a regional impact is considered, in the same way as it will clearly wish to see evidence of need and a projection of outcomes.

The Association also feels that whilst any such bid must have the support of the local authority there should be the flexibility for local solutions, where other organisations or partnership might make submissions directly to Welsh Government.

This has the potential to encourage local private public partnerships to be developed which are not dependent upon the resources of the local authority at a time of significant public sector cutbacks.

6. We want to ensure effective monitoring and evaluation of regeneration activities; will the approach set out achieve this?

The Association supports the Results-Based Accountability model being proposed. It would encourage Welsh Government to provide appropriate training to support this approach particularly if a system of bidding for funds is developed open to private and third sector organisations predicated upon such an approach.

Conclusion

I would like to finish by thanking the Welsh Government for the opportunity to comment on this important document.

95. Rhondda Housing

Please find attached response on behalf of Rhondda Housing Association

Consultation Response

1. What is your feedback on lessons learnt from delivery to date?

At workshop it was stated that CREW had provided 32 interventions, based on Communities First outcomes which were universal and could have been included in the proposal but there are none listed in the document. Does this suggest that they were not seen as transformative or too localised or not significant enough to form part of a service/delivery testing mechanism for the new proposal or will they be included at a later date? There are some successful sustainable outcomes from the original programme where the what – why - where, invest – evaluate - change principles were embraced along with a passion to change which could provide in future more buy in from public. The proposal does not appear to be focussed on how to grow regeneration success or build on small successes eg the Job Match scheme was successful with 7000 plus jobs created.

2. Should other national outcomes or principles be considered?

There are a myriad of other national outcomes and principles equally important that stretch across other national work areas and it is for the WG to determine what could/should be included within this based on current and previous feedback from delivery of those programmes in order to prevent confused messages being made.

3. What more can be done to achieve greater coherence and cross cutting action across departments?

There is a presumption in Wales that the public sector has the monopoly on regeneration eg BP, Celtic Manor. Its role should be to oil the wheels and facilitate and the focus should not be based on an idea that regeneration will only occur if the projects are funded by the European Union. Accessing funding in this way tends to stifle joined up working and does not facilitate longer term focus. Past experience suggests that regeneration work only takes place if the word is in your role. This paper accepts that regeneration has a much broader impact than that and as with stock transfer aims, local pound spend considerations it should build on this.

4. Do you agree with the national, regional and local approach set out?

There does not appear to be any logic with regard to the choice of areas and inclusion into the regional groups. However, we are moving to a regional agenda in Wales for services along with the introduction of universal credit and crucially payment by results. Most public services will be re-tendered. We are now clearly operating in a "commissioning economy" where monitoring and delivering outcomes drives funding.

5. Do you have any comments on our proposals for how we will target and direct our funding?

The whole of the Welsh Government funding framework should be geared towards regeneration, this could provide focus to meet new challenges, assist in a culture change and prevent a blame game with other departments. Chasing funding in order to maintain a status quo does not enable us to look at long term benefits so resourcing up front would develop this further.

6. We want to ensure effective monitoring and evaluation of regeneration activities; will the approach set out achieve this?

Effective monitoring and evaluation will be pivotal to this approach and targets set will only be achievable if a whole systems approach is adopted by the specialist regeneration team within the WG. It is vital that realistic, achievable targeted are set with the commissioner leading on this, that the right things are measured and measured properly to inform change and improvements and not leave us tied in to targets based on historic values and patterns.

96. Welsh Heads of Environmental Health Housing Technical Panel

Consultation Response -Welsh Heads of Environmental Health Housing Technical Panel-Welsh Government Vibrant and Viable Places.

The Welsh Heads of Environmental Health Housing Technical Panel is a body of professional managers who have responsibility for mainly private sector housing within local authorities. It is representative of all twenty two local authorities and main function is:

- Promotion of good practice and service improvement
- Development of strategy and policy in relation to private sector housing issues.

The group has supported both Welsh Government and the WLGA in the respect of these issues over a number of years. Our consultation response is as follows:

Consultation Question 1. What is your feedback on lessons learnt from delivery to date?

It is the view of the Housing Technical Panel that the role of housing led regeneration is particularly underplayed in the consultation document.

Renewal Areas have played a significant role in regeneration in Wales. Over a period of twenty years nearly sixty Renewal Areas have been declared encompassing nearly sixty thousand houses. It is widely acknowledged that they have made a huge impact in terms of the addressing poor housing but also in terms regenerating communities, improving the local environment, increasing employment and improving commercial activity.

Most Renewal Areas have been run and sustained by innovatively drawing on a range of financial resources such as specific capital grant, Arbed, local authority funding and private finance. Local authorities have also been successful in linking these resources with strategic regeneration funding suggesting there are already very good relationships between housing and regeneration teams.

The Renewal Area focus has been to improve living conditions in the most deprived communities, many of which involve run down town centres and run down seaside locations. It is our view that the Renewal Area approach could be a model for future regeneration activity in Wales.

It is apparent Welsh Government is withdrawing its direct funding of Renewal Areas despite the findings of their "Review of Renewal Areas" published in 2009 which highlighted their value. This will have serious implications in respect of some of the most deprived communities in Wales. This will place local authorities in a very difficult position post 2014 as it is unclear that there will be alternative mechanisms to support existing Renewal Areas.

Consultation Question 2. Should other national outcomes or principles be considered?

There seems to be a lack of focus and clear outcomes in relation to housing. There is clear evidence there are concentrations of poor housing in Wales. We believe good housing is a very basic requirement and should be the starting point and integral to any regeneration activity.

If the aim is to strive for improved living conditions consideration should be given to developing outcomes linked to the World Health Organisation definition of health "as a state of complete physical, mental and social well-being and not merely the absence of disease or infirmity". The Housing Technical Panel with Welsh Government and All Wales Chief Housing

Officers Panel are currently undertaking a study which will consider the health impact of activities in Renewal Areas across Wales which may be of value in developing outcomes. On behalf of both groups I would welcome the opportunity to discuss this ongoing work.

Consultation Question 3-Do you agree with a national or regional approach?

There does not seem to be enough evidence to suggest it could be delivered more effectively on a regional basis.

We believe that a strategic approach to housing in particular should be delivered locally. There are already very effective mechanisms in place to deliver regeneration locally linked to both regional and national funding opportunities. Whilst there are good examples of situations directly linking strategic regeneration funding with housing improvement, there is concern that the housing focus will be lost in broader regional regeneration activities in future.

In addition it seems over bureaucratic to consider setting up additional bodies. There is also the question of how resources are prioritised and democratic accountability.

Consultation Question 4-Do you have any comments on our proposals for how we target funding direct funding?

Again there appears to be no consideration in relation to how resources are targeted to housing. There are existing funding mechanisms relating to housing led regeneration e.g., Arbed and Specific Capital Grant. There is a range of evidence to support the continuation of this funding, however there is a complete lack of clarity on its future.

Members of the Housing Technical Panel and All Wales Chief Housing Officers would welcome the opportunity to directly inform any debate on the future funding and targeting resources into housing renewal in Wales.

Consultation Question 5-We want to ensure effective monitoring and evaluation of regeneration activities, will the approach set out achieve this? We agree a Results Based Accountability Approach will be useful in terms of ensuring outcomes are achieved.

Jonathan Willis, Chair Welsh Heads of Environmental Health Housing Technical Panel

97. National Parks Wales

PART 1: Consultation Response to the Document – general comments

4.2 Vision

The Vision should encompass the need for ‘well-balanced’ economies rather than ‘strong’ economies. There can be strength, but with reliance on a single industry – this is where Welsh communities have been exceedingly vulnerable in the past with dire consequences. Balance in the long term is more beneficial to a greater spectrum of the community and more sustainable, with communities able to ride out recession more successfully.

The need to consider rural regeneration in its own right should not be lost as part of the approach outlined here. Rural communities are subject to similar (sometimes more acute) problems in this area, including weak economic growth, poor infrastructure, a lack of affordable housing and limited access to services. Welsh Government's approach to regeneration nationally should therefore include programmes which are tailored to the needs of rural communities so that they are not overlooked to the extent that future problems are created. The work of Wales' three National Park Authorities provides examples of best practice in terms of local grass roots initiatives.

4.3 Our National Outcomes

While we are pleased to see positive references to the role that well managed historic and natural environments make to healthy and prosperous communities, we feel that the outcomes could go further in recognising the need to safeguard the key eco-system services which are fundamental to our well-being. The role that the upland areas of the Brecon Beacons and Snowdonia National Parks play in providing sources of fresh water to urban communities in North and South Wales is just one example.

5.2.iii Sustainability

We welcome the acknowledgement that effective regeneration requires long-term commitment and that programmes need to be considered long time spans of 10-15 year or more. We would stress that it is important to recognise also that programmes are not always best contained within localized boundaries. Our work in support of the social inclusion and tackling poverty agendas shows that access to wider experiences and learning opportunities in unfamiliar environments has a positive effect in developing skills and the appetite and capacity for community development initiatives on the homefront. Many opportunities arise in our National Parks which can play their part in supporting regeneration throughout Wales. Their role can contribute to the more healthy and confident communities, providing learning opportunities and widen life experiences and changes all necessary to enable communities to be self-sustaining and supporting in the long term.

In addition, Regeneration in rural areas is much more likely to be sustainable if wider consideration in parallel of supporting infrastructure is taken into account as that infrastructure has a far more significant impact on community resilience. For example, good transportation links (including public transport) and communication infrastructure - especially access to reliable high speed broadband – are essential if rural businesses and communities are to prosper. As energy prices increase such infrastructure, and emerging infrastructure such as local renewable energy schemes and charging networks for electric vehicles for example, will be of increasing importance in successful regeneration initiatives.

6.1.ii The Third Sector

The acknowledgement of the part the third sector plays in supporting regeneration through local initiatives and alternative enterprise models is welcomed as is the recognition that establishing community pride and

sense of place is a fundamental outcome for regeneration programmes. Wales' three National Parks are doing much to support the third sector through our community development and sustainable tourism work and we would be pleased to provide more details. A sample of community regeneration case studies from the Brecon Beacons National Park is attached as Annex 1 to our submission by way of examples.

6.1.iv Housing Regeneration and Heritage

National Parks provide the ultimate designations, where landscape, historic environment and the visitor economy are finely balanced. They provide working examples of how these competing issues need to be dealt with for the long-term advantage of Wales.

National Parks can support successful regeneration at regional level by providing a backdrop to regeneration activity through their wider conservation and recreation remits, and by helping to attract investors and providing tourism and recreation opportunities as appropriate through the development of heritage and community assets.

6.1.v Other Government Areas and:

Business, Enterprise, Technology and Science (p.18)

We welcome the recognition of the importance of tourism to the Welsh economy and the positive steps that are being taken to co-ordinate and strengthen a regional approach to destination marketing across Wales. Tourism is critical to Wales' rural economy and regeneration programmes need to be aligned with this in mind.

Planning (p.19)

Enhancement and improvement are commendable targets for our built environment. LPAs should focus on achieving good quality which will serve the test of time. All LPAs could be requested to prioritise proposals which support regeneration through changes to WG targets on planning applications for example.

Transport (p.19)

The Active Travel Bill needs to go hand in hand with promoting workplace cycles stores, lockers, showers and also a more flexi-time system to business.

The recent cuts in Local Transport Grant funding are having a noticeable impact on the support available for visitor transport initiatives and in the Brecon Beacons National Park this is likely to lead to significant reductions in or possibly even the cancellation of Beacons Bus services in future years and this will have a negative effect on the local tourism economy.

Education and Skills (p.20)

National Parks Authorities are well placed to collaborate with others in developing local skill bases and supporting training across National Park and nearby communities. National Park teams can deliver education programmes and training, building on their existing, strong relationships with local communities. The Mosaic and Rural Skills training projects are both good examples of our current work and the National Park

Ambassadors Scheme in the Brecon Beacons National Park shows what can be achieved through a local initiative aimed at the development of visitor experience skills for businesses and community representatives.

Environment (p.20)

Good access to the natural environment can be an important element of successful regeneration, providing opportunities for healthy activity and recreation locally. Natural England has produced ANGSt (access to natural green space standards) as a guide to good practice in this area.

Adaptation to climate change should be given appropriate weighting when making decisions about regeneration activity, particularly in the most vulnerable environments. And the importance of ecosystem services in providing the fundamental building blocks which are essential to community prosperity and well being needs to be positively acknowledged and supported in the development of regeneration programmes. It is important the the Rural Development Plan provides sufficient flexibility to enable a range of projects to be undertaken which link the good management of ecosystems services with regeneration initiatives. We welcome the new Natural Resources Body being given a strong mandate and resources to work at a local/regional level in this area.

We acknowledge the success of the Valleys Regional Park programme and welcome the new framework for the Valleys and would strongly support the development of similar regional approaches across Wales.

Health (p22)

National Parks across the UK have their origins in the recognition that urban populations needed to be able to access high quality countryside for health and recreation. Those objectives are as true today and Wales' National Parks could provide the opportunity for kick-starting life-style changes and learning opportunities in a healthy environment to promote confidence and motivation. Current programmes such as Mosaic the Rural Skills training project are excellent examples of how this can be delivered in parallel with regeneration work.

6.2 The New Delivery Framework and key roles

We agree that there needs to be a clear, transparent, and accountable delivery structure to co-ordinate and deliver the regeneration agenda at local, regional and national levels. While we recognize the need for Local Authorities to lead on the development of local regeneration approaches it is important that local communities and other key stakeholders such as the National Park Authorities are fully engaged in that process at local and regional levels in particular.

The proposal to strengthen regeneration delivery at the regional level is to be welcomed but we do have concerns about the proposed South West and Mid Wales region, which we feel is too large and too diverse to enable effective working. We acknowledge that the three regenerations regions proposed mirror the proposed WLGA regional boards but would argue the the South West and Mid Wales regions should be split into two to reflect: 1) the urban regeneration priorities of the Swansea/Neath Port Talbot/Llanelli city regions; and 2) the rural regeneration priorities of Mid and West Wales.

In this way more focused programmes would be able to be developed for each, targeted more effectively at local needs and priorities. Should this not be possible or accepted then we would argue that the region should be structured in such a way that there are separate urban and rural strands to its regeneration work.

We welcome the concept of regional regeneration boards for each of the four regional areas (assuming our comment above is accepted) and would argue that in order for such boards to be effective all of the key stakeholders need to be actively engaged. To that end we feel Welsh Government needs to provide further clarity regarding the respective roles and relationships between the proposed Regional Regeneration Boards, the proposed WLGA Regional Boards, and the existing Local Service Boards and Local Authority led Regeneration Partnerships. How the Regional Regeneration Boards will be expected to work in conjunction with Local Planning Authorities and in response to existing and emerging Local Development Plans is also a piece of further work that we feel is required. At a national level the vision and strategic direction need to be flexible enough to enable and stimulate action at a grass roots level, particularly in rural communities, and it is important that local determination is not stifled. We welcome the proposal to strengthen and enhance the National Regeneration Panel and to give it an advisory role at Ministerial level. Membership of the Panel should reflect the Regional Regeneration Boards and we feel it important that National Parks Wales should be represented given our community development/sustainable tourism work and our role and experience in developing exemplar community regeneration projects in the widest sense.

6.3 Key approaches for the Regeneration Framework

We strongly support an evidence based approach to regeneration delivery and would agree that regeneration is not just about physical capital programmes. Sustainable regeneration has to involve capacity and skills building at a local level and the harnessing of sense of place and nurturing of local pride. It should however not just be about focusing on declining communities and places. A prevention role is equally important, especially in rural communities, so that these communities, which do not have the same levels of flexibility as many urban communities or do not benefit from the critical mass of population to support the delivery of a wide range of services, can remain resilient in the face of growing pressures such as an emerging digital economy, climate change, and energy price shocks.

6.3.ii People based

Skills development and capacity building is key in order for both rural and urban communities to prosper. The proposal to map current activity in Communities First clusters is welcome but we would stress that this needs to also capture activity geographically external to Communities First areas which supports community regeneration outcomes. Wales' National Parks do much to support work in Communities First Areas, especially in terms of social inclusion through projects such as Mosaic and Rural Skills training and it is important that these linkages are recognized. In addition the National Parks can provide a dramatic backdrop to outdoor sports and

recreation. For example, the Ironman Wales event, which is supported by various public and private sector bodies achieves so much more than merely staging a sporting event. The National Parks are opportunities which can be used more for promoting health and wellbeing of the citizens of Wales at all levels and for the development of soft and transferrable skills needed as precursors to community regeneration initiatives.

6.3.iii Place based

We fully support the recognition that quality of place is key determinant of health and well being and conserving and enhancing local distinctiveness is a critical component of this. In a rural context local distinctiveness is often one of the only platforms on which to develop community regeneration initiatives and National Parks Wales are undertaking valuable work in this area which can help inform new approaches to rural regeneration in Wales.

6.4 Governance Structure

In addition the comments we have made above we would welcome further clarity on the composition of the proposed Regional Regeneration Boards and would argue strongly that Wales' National Parks should be represented on these given our role as enablers of community development and regeneration projects and in sustainable tourism development and destination marketing, both of which involve strong activity in terms of sense of place and local distinctiveness.

6.5 Investment

We acknowledge the need for a funding formula to establish indicative funding allocation for each of the regions proposed and would argue strongly that any formula must account for rural communities so that delivery is undertaken on an equitable basis across Wales. We fully support the proposal to establish clear investment streams and especially the interventions proposed for Local Growth Zones and Enhanced marketing and Destination Management. We would suggest that an environmental investment intervention be considered such that an ecosystem services approach may be dovetailed into regeneration activity at a regional level. The proposed Physical reconfiguration of sites and wider areas intervention could be expanded to accommodate this and also acknowledge the role the natural environment plays in rural communities.

6.5.ii Design and Criteria

We welcome the development of a criteria-based approach for judging investment proposals and programmes. In addition to the evaluation criteria listed, would suggest that consideration be given to developing criteria which address the needs of rural communities. The consultation document has acknowledged that most of Wales is characterized by small settlements in a rural context and also that deprivation affects rural communities as much as it does urban communities. so the evaluation criteria proposed need to acknowledge this in some way.

PART 2: Consultation Response to the questions posed

1. What is your feedback on lessons learnt from delivery to date?

Our experience of approaches to regeneration to date has been that, in the context of individual regeneration projects, there has too often been limited acknowledgement of proposed end uses at the project inception stage. In addition, private sector involvement has not been very successful given the current economic climate and there has been little long term consideration for a flexible approach during any period of 'waiting for the market to pick up'.

At a Wales level, we would agree that the decision to focus investment in the Strategic Regeneration Areas, for example, was too rigid and created a two tier approach which did not reflect the economic or social geographies of places and regions. A more flexible approach is needed in future. In a similar vein, the Valleys Regional Park programme for example, while very successful, could have delivered stronger outcomes with a more flexible approach to boundaries which acknowledged the geographic and socio-economic relationships between Valleys communities and the Brecon Beacons National Park.

2. Should other national outcomes or principles be considered?

'A skilled and confident existing and future workforce' (sub-section 4.3.ii Outcome Two: Learning Communities) could read more appropriately 'A flexible, skilled and confident workforce'. There needs to be a recognition that jobs are not for life and that people have to accept that being flexible will be a key future requirement in the employment market.

3. What more can be done to achieve greater coherence and cross-cutting action across departments?

It is difficult at this stage to respond in detail to this question as the proposed national and regional approaches need time to bed in. In addition to the proposals for a Ministerial Advisory Panel on regeneration, the Regional Regeneration Boards, and a lead role for Welsh Government's Housing, Regeneration & Heritage portfolio, the latter could consider whether the establishment of cross-sectoral and multi-stakeholder working groups could add value to the work of the Panel and Regional Boards. The Local Authority Regeneration Partnerships might provide a good foundation from which to start.

4. Do you agree with the national, regional and local approach set out?

Broadly yes, but in our comments set out above with regard to section 6, and in particular sub-section 6.2, we feel that further consideration needs to be given to the appropriateness of a South West and Mid Wales region given its geographic and economic diversity and urban/rural split. We would also welcome further clarity on the roles and relationships between the proposed Regional Regeneration Boards, the proposed WLGA Regional Boards, Local Authority led Regeneration Partnerships the existing Local Service Boards. How the regional approach to regeneration and associated governance ties in with Local Planning Authorities and existing and emerging LDP's also requires further clarification. We would also welcome further details of the composition of the Regional Regeneration Boards and National Regeneration Panel and feel that

National Parks Wales should be represented given the important role we play in working with rural communities.

98. Welsh Optometric Committee

Thank you for providing the Welsh Optometric Committee the opportunity to respond to this consultation. As one of the seven statutory advisory committees to Welsh Government, we would wish to offer the following comments: -

Q1 – What is your feedback on lessons learnt from delivery to date?

We welcome the approach by WG and recognise that this paper regards the community as a whole rather than simply the high street, we should point out that retail is changing dramatically with a shift to out of town and internet shopping. As this change is global and often generational, the future for the high street may be radically different from that which is presently accepted as a norm. This trend cannot be altered by government policy other than recognising its inevitability but the impact may be mollified by that policy.

Q2 – Should other national outcomes or principles be considered?

From a commercial point of view, WG should be aware of the impact of rents and rates on viability of primary care establishments: should they not consider particular allowances in development areas to ease this burden? Much of this is mentioned in the Rural Development Plan but urban areas are similarly affected.

Local Authority should be obliged to make assessments of the impact in new "out-of-town" centres on existing communities by diverting traffic and footfall and transport should include access for vehicles and realistic parking charges to encourage local facility use.

Q3 – What more can be done to achieve greater coherence and cross cutting action across departments?

Education, Housing and Transport are all key elements for productive community regeneration.

Education should also include Health Education and promotion and should include taking responsibility for one's own wellbeing.

The vision within the consultation talks about prosperous communities which are supported by well-connected transport links. Anecdotal evidence suggests that some patients are finding getting to and from appointments increasingly difficult, which acts as a disincentive to encouraging self care. A recent report included the tale of the Merthyr patient who declined referral for a sight-threatening condition to Royal Glamorgan Hospital as it would have involved three buses and changes in each direction.

As the population ages, provision will have to be made for an increased number of visually threatened patients, within the housing stock offered to this segment of the community. (see the Eye Care Plan).

Q4 – Do you agree with the national, regional and local approach set out?

Q5 – Do you have any comments on our proposals for how we will target and direct our funding?

Good vision is highly regarded by the public. Eye health in communities is dependent on having local community optometry practices with good access and facilities (i.e. adequate opening hours and adequate levels of staffing and equipment). This requires continued investment in optometry services and awareness by government that dependence on private dispensing to keep practices open is no longer a viable option.

Q6 – We want to ensure effective monitoring and evaluation of regeneration activities; will the approach set out achieve this?

99. Monmouthshire CBC

Response to Consultation from Monmouthshire County Council

Monmouthshire County Council is grateful for the opportunity to respond to the above consultation. Our responses to the questions raised are as follows:

What is your feedback on lessons learnt from delivery to date?

With the exception of North West Wales, the Regeneration Areas approach has tended to focus on deprived urban areas and largely overlooked the needs of rural communities. It is vital that future approaches to regeneration in Wales recognise and seek to address the fact that rural areas need regenerating too. Much of the east side of Wales is heavily rural and should not be overlooked.

Experience to date demonstrates that it can often be difficult to deliver much needed economic growth in deprived urban areas and that the solutions to a community's problems do not always lie exclusively within their locality.

Regeneration should therefore not be confined to helping underperforming places, areas or communities. It also needs to help ensure that all communities continue to flourish, adapt and make best use of their assets. In doing so it can help to deliver 'Quick Wins' such as those that allow some of the benefits of economic growth arising in rural areas to flow into neighbouring deprived urban areas. Strategic approaches to regeneration (and consequently funding) need to understand the importance of this and allow for proactive and not just reactive approaches. These offer the potential to deliver higher returns on investment by building on strengths rather than just responding to weaknesses.

Should other national outcomes or principles be considered?

Regeneration should not be confined to helping underperforming places. It also needs to help ensure that all communities continue to flourish, adapt and make best use of their assets.

The approach proposed in Vibrant & Viable Places is too heavily focused on underperforming, urban spaces. Rural deprivation is typically associated with isolation - from services, employment and community interaction and there is a need to develop a 'Whole Wales' approach to regeneration which gives greater recognition of the needs of rural areas.

Greater credit and support also needs to be given to areas that are already demonstrating effective approaches to regeneration so that they can assist

neighbouring, poorer performing areas to integrate themselves and learn from this success.

With regard to the proposed National Outcomes, we believe that Outcome One: 'Prosperous Communities' should include an outcome relating to improved workplace earnings. A number of measures may also benefit from further definition e.g. that which refers to 'A thriving private sector and social enterprise'.

What more can be done to achieve greater coherence and cross cutting action across departments?

Key partners, including Welsh Government, need to embed regeneration across all of their departments and improve communication internally and externally to ensure that all relevant officers have a greater understanding of wider priorities across portfolios. Improved communication mechanisms need to include face to face and virtual channels for exchange of information. These need to learn from good practice developed elsewhere and to utilise ICT tools that may already be available at low cost for such purposes.

Axis 3 and 4 of the Rural Development Plan provide a good example of how this works well within Welsh Government, with the priorities (on a horizontal axis) feeding into each and every Department (on the vertical axis). The chosen priorities should under-pin the work done by each Department and communication is key.

Do you agree with the national, regional and local approach set out?

Under the proposed Framework, there remains a risk that regeneration funding and projects will predominantly benefit deprived urban areas or those that have access to EU convergence funding.

For local authorities to take ownership and to have the best opportunities possible to regenerate local areas the Welsh Government needs to ensure that its strategies are not ignoring certain areas in favour of more urban, deprived communities.

Regional collaboration and spatial planning also needs to be genuine, equitable and address the needs of rural as well as urban communities. If it is to secure genuine buy-in from all partners it needs to incorporate local representation, local consultation, local objectives and local delivery. RDP LEADER provides a good example of best practice in this regard.

It is unclear how local authorities will be represented on regional boards. However, it is vital that they are individually represented and that governance mechanisms ensure that the views of those delivering and affected by regeneration policies and practices are listened to and taken account of.

It is vital that lessons arising from earlier regional collaboration are learned, including those arising from the Wales Spatial Plan. Recent experience suggests that the regions and competitiveness areas are confined to being spectators of the cities and convergence areas in much of the regional collaboration to date.

Monmouthshire is connected in a strategically important way to both South East and Mid Wales and has much in common with the latter, including a shared interest in the Brecon Beacons National Park. There is therefore a strong case for it to be granted membership of the regional boards covering both of these areas in a similar way to that proposed for Bridgend.

Do you have any comments on our proposals for how we will target and direct our funding?

Reference has already been made to the risk that the proposed approach will mean that regeneration funding and projects will predominantly benefit deprived urban areas or those that have access to EU convergence areas. In the South East region, Monmouthshire is faced with issues, responsibilities and opportunities that are distinct from other local authorities and it is vital that the regional business plan reflects these.

RDP is one of the few mechanisms specifically identified within the proposed Framework as a means of addressing rural issues but is not sufficient in itself to address the needs of rural and semi-rural areas. There needs to be greater support centrally for rural regeneration, not simply through the existing European funding programmes. Any proposal that would lead to RDP funding being made available to urban areas would further erode the limited resources currently available to address issues affecting rural communities in Wales.

Whilst RDP does provide an opportunity to develop local 'solutions' to problems, the current 'conversation' on the future of the RDP intimates a deprioritisation of Tourism and Heritage which threatens the competitiveness of rural areas and risks increasing the problems of rural deprivation. This appears to conflict with the recognition that the proposed Regeneration Framework gives to the important role that heritage can play in regeneration. Whilst the funding proposals include provision for enhanced marketing and destination management, this needs to be underpinned by closer working between Welsh Government and local authorities to develop a 'Whole Place' approach including the development of a 'Distinctive Places' strategy that provides direction and clarity for authorities looking to brand and market their destinations in ways that complement other 'distinctive places' within Wales.

We want to ensure effective monitoring and evaluation of regeneration activities, will the approach set out achieve this?

Evaluation criteria should be focussed on outcomes and impacts and how they address an identified need. They should not be constrained by location or individual funding streams. Inevitably, location and funding will afford an 'advantage' to certain projects. However, it is conceivable that good projects will emerge that are neither cluster located nor come with EU match funding but address a regeneration need with clear and tangible outcomes that will deliver attractive levels of return on investment. It is vital that the Regeneration Framework and regional boards are able to accommodate these.

100. Flintshire County Council

Welsh Government Consultation:

Vibrant & Viable Places: A New Regeneration Framework

Summary

- Following a review of Regeneration Policy a consultation on a new Regeneration Framework for Wales was launched for consultation by the WG on the 22nd October. The closing date for responses to the consultation is Monday the 14th of January 2013.

- This consultation expands on the Welsh Governments proposals for housing renewal and regeneration within the Housing White Paper, published in May 2012.

Expected Outcomes

- Delivering better outcomes through joined up working
- Using sustainable development to tackle poverty and promote equality of opportunity
- Integration of Communities First with other regeneration activity

Proposals

- Aligning regeneration with the Communities First programme and Welsh Government programmes for: Prosperous Communities, Learning Communities and Healthier Communities
- Establishment of a national Ministerial Advisory Group.
- Creation of three regional boards: North, South East and South West & Mid reporting to the Ministerial Advisory Board. It is proposed that these boards will be allocated an indicative funding allocation based on a formula and will be required to prepare an annual business plan, commencing in 2013/14, setting out how the allocation would be spent.
- Directing targeted funding: The Welsh Government proposes to merge regeneration investment targeting the following streams:
 - Evidence, mapping & business cases
 - 'Successful Places' – focused on but not limited to:
 1. Town centre management
 2. Business Improvement Districts (BIDS)
 3. Local Growth Zones
 4. Enhanced marketing and destination management:
 5. Physical reconfiguration of sites and wider areas
- The consultation refers to the need to consider housing renewal funding requirements and how this could be linked to maximise broader regeneration outcomes.

Possible Implications

The consultation document, although very light on housing content does recognize the positive impact of regeneration on housing, partly through the impact of housing-lead regeneration:

- Investment in housing through generating demand and the resulting supply chain benefits
- Health benefits of housing investment
- New and innovative construction techniques
- Examples of initiatives such as i2i
- Promotion of town centre living
- Regeneration and Housing Need – market improvements brought about by meeting demand through employment and other opportunities e.g. housing for trainees, graduates, apprentices etc. through to senior managers.
- The establishment of the regional boards are a cause for concern. If the proposed regional groupings are established the existing regeneration priorities of the constituent authorities do not lend themselves to broad regional cohesion. Both Flintshire and Wrexham are focused on attracting major employers in a range of high tech and heavy engineering

fields. Conversely, Conwy, Denbighshire, Gwynedd and Anglesey (with the exception of Anglesey's Energy Island initiative) focus on tourism, heritage and smaller scale employment initiatives.

- This variation is reflected in the existence of the Strategic Renewal Areas in Conwy and Denbighshire where housing renewal forms a significant element of the regeneration approach adopted.
- The Housing White Paper (the consultation to which FCC responded to in August 2012) flagged the Welsh Government's intention to consider how Housing Renewal Area funding could be used to best effect for housing led regeneration within its review of regeneration policy. This suggests that the Welsh Government is taking seriously the opportunity to join together housing renewal and regeneration.

Summary of Potential Risks

- Potential introduction of competition for funding between housing renewal and broader regeneration programmes. This could be exacerbated by reductions in overall funding streams.
- Amalgamation of funding streams may result in the need to prioritise investment between housing renewal investment and broader regeneration investment.
- Does the absence of a strategic regeneration area in Flintshire (e.g. the Rhyl model) place housing renewal funding at risk?

General Comments

Consultation Question 2, should other national outcomes or principles be considered?

Vibrant and Viable Places contains a lot of rhetoric but is undercooked as it does not give a clear vision of:

- what it is for, for example an element of delivering higher level outcomes such as a sustainable Wales
- its guiding principles on regeneration: for example communities (towns/villages) with a strong sense of purpose and reason for being, a flexible and learning workforce, strength in diversity (businesses/etc), strong public/private partnerships to make best use of resources, a measured and positive approach to risk/failure and a culture of openness to change/innovation (pages 11 to 14 cover these but its too vague)

It is a loose description of elements that might be involved in regeneration without being particularly prescriptive on how they might be mixed to produce regeneration. On specifics on page 17, the housing (in broadest sense) section, needs to emphasize its current and future contribution to regeneration and what WG is going to do to promote this. Not just dwell on what should be assumed, housing's role in individual and community well being. For example, emphasize the benefits to regeneration of:

- housing building for sale or rent
- the council facilitating land supply
- the declaration and funding of renewal areas
- energy efficiency and carbon reduction programmes
- sustainable housing which not only reduces carbon emission and fuel poverty, but also reduces the impact of welfare reform and falling household incomes
- capital programmes of Councils and RSLs to maintain and upgrade properties to WHQS and beyond

- programmes to bring empty properties back into use
- supporting local employment opportunities through the construction industry, or the local supply chain through the use of goods and services
- the council promoting new and more effective methods of construction
- the council, SP, Health etc assisting the development of the private rented sector
- the council promoting innovative tenure forms such as coops and equity sharing schemes
- making the links with reductions in crime and anti social behaviour, through secured by design and promoting community cohesion

Consultation Question 3, do you agree with a national or regional approach? While a regional approach is good because it gives local flexibility the proposed regional split seems odd. The North West and North East don't have similar issues that could be dealt with through a one North Wales region approach.

101. Pembrokeshire Association of Voluntary Services

Consultation Question	Pembrokeshire Association of Voluntary Services Response
What is your feedback on the lessons learnt from delivery to date?	Whilst the lessons learnt from delivery to date cover key and important points , it is my view that there are also potential to consider whether lessons are appropriate around the issues of lack of continuity of or long term funding for an area which means that projects can have a limited impact despite successes and; the potential lack of requirement to seek all sector input and to work with key organisations in a way which builds partnership, explores new working and shares expertise across those sectors.
Should other national outcomes or principles be considered?	There is a good range of outcomes across the headings for prosperous communities, learning communities, and healthier communities, but relationships between the outcomes needs more consideration to ensure that they are not seen in isolation. The following additional outcomes could broaden the scope of the approach <ul style="list-style-type: none"> • Thriving and enterprising communities (prosperous communities) • Opportunities for local recreation (healthier communities) Pembrokeshire Association of Voluntary Services supports the approach which ensures that all sectors including the third sector work together, that social enterprise is thriving, and affordable housing is in sustainable locations.
What more can be done to achieve greater	Identifying a specific portfolio with responsibility for achieving better joined up planning and delivery across government departments will help to ensure that this

<p>coherence and cross cutting action across departments?</p>	<p>process gains momentum and is supported. This approach provides clear leadership and improved accountability.</p> <p>Please consider the following comments of the themes outlined within this section of the document -</p> <p>Housing. The role of sustainable housing in renewal schemes is acknowledged, however housing should be seen within the wider context of sustainable communities, where facilities, jobs and sense of community are also key factors.</p> <p>Business, Enterprise, Technology and Science. This section should also acknowledge the potential role of social enterprise in skills improvement and job creation.</p> <p>Transport The role of sustainable public transport in enabling communities to access facilities is welcomed.</p> <p>Education and Skills . The potential for skills development to be regionally focussed on employment needs provides an appropriate basis for the way forward. However care should be taken to ensure that skills remain transferable and relevant to the longer term.</p> <p>Health. Inclusive approach to mental and physical health as part of regeneration welcomed</p>
<p>Do you agree with the national, regional and local approach set out?</p>	<p>A local, regional and national approach is the right basis for ensuring that regeneration pulls in the right skills and knowledge at the right level and is supported.</p> <p>Locally, whilst the role of the local authority is key in many areas, greater partnership working with the third and private sector as stated within the principles of regeneration is a key element of the local approach and would be welcomed.</p> <p>The Regional regeneration board approach is welcomed, however this approach should avoid duplication of existing partnerships and ensure that there is cross sector representation. The regional board would help to set priorities.</p>
<p>Do you have any comments on our proposals for how we will target and direct our funding?</p>	<p>6.3.i The required evidence base seems to be comprehensive, but should allow for additional locally significant information to help evidence approach.</p> <p>Welcome the recognition of people based contribution to regeneration, and the 'softer' but important outcomes they achieve.</p>
<p>We want to ensure effective monitoring and evaluation of regeneration activities. will the approach set out achieve this?</p>	<p>This approach would provide an effective means of demonstrating whether outcomes have been achieved in ways which ensures plain language, partnership working and innovation is supported.</p>

102. Children's Commissioner for Wales

Consultation response

As Children's Commissioner for Wales I frequently meet children and young people who talk to me about wanting the freedom to play and 'hang out' in community spaces and about the barriers they face in accessing spaces where they can feel safe and are not targeted by adults to be moved on. Children and young people also talk about environmental poverty and often about the ways in which they are contributing to the regeneration of public places in their communities.

I am concerned that the Minister's duty to have due regard to the UNCRC under the Rights of Children and Young Persons (Wales) Measure is not adequately reflected in the document. I am not clear that the due regard duty has been effectively applied to this proposed new policy framework. Although issues of importance to children and young people as community members are included, as are some relevant outcome measures I would like to see stronger consideration of the implications of the policy framework as a tool for promoting the rights of children and young people in Wales.

I will not be responding to individual consultation questions. The framework appears to reflect a sound evidence base but the technical issues are beyond my areas of expertise. However it is clear that supporting vibrant and viable places will play a crucial part in supporting the realisation of the rights of children and young people in Wales and that the framework should more clearly reflect this.

Research¹ has indicated that most environmental planning effectively reflects only adult principles and forms of activity. Matthews² argued for the need to investigate the local environment as seen by children and to involve them as informants in regeneration decisions because 'only in this way will they (children) become full and integrated users of large scale places' (2002:457). Research published in 2011 by the Centre for Research in Social Policy³ concluded that 'the spatial aspects of children's participation crosscut the wider participation agenda, but have been overlooked within a service driven approach to policy-making' (Day et al, 2011:1). My staff have supported children and young people to be heard in planning decisions, although it remains disappointingly rare that this happens despite children being recognised as a group of consultees in Welsh Government guidance. It is also concerning that adults can sometimes be hostile when children and young people participate.

The Centre for Research in Social Policy⁴ suggests that there is evidence from research and practice that children and young people can play a significant role within planning and regeneration processes, with potential benefits at individual, peer groups and community levels. Further the research found that 'poorly conceived planning exercises can serve to restrict children's independence and mobility; their access to community resources or safe open spaces, and their opportunities to interact with people from different age or social groups'.

Research⁵ undertaken with primary school children in Swansea in 2005 demonstrates the ways in which children recognise issues of place and are able to offer constructive recommendations for regeneration. The children reported that environmental policy impacted on their play opportunities and sense of safety within their community. They recommended:

- Better traffic calming and make it easier to cross the roads,
- Overgrowth clearance so empty spaces are safe,
- More parks/open spaces to play in,
- More shops,
- Smarten houses and gardens,
- Move the litter, scrap cars and clean the streets.

The same issues were raised in research undertaken with children, young people and their parents in Swansea in 2011.⁶

My Office and South Wales Police published a guidance document⁷ which presents an holistic multiagency youth at risk prevention model for South Wales. The document identifies the three main beneficiaries of the active involvement of young people which included the community benefits of young people using their newly acquired skills and their active citizenship by:

- Making improvements to the physical environment,
- Developing new services,
- Reducing anti-social behaviour and offending as young people become more and more involved in positive things to do.

Earlier this year I visited a number of Communities First communities as part of the work I undertook in preparing my Child Poverty Strategy.⁸ Many of the children and young people I met in these spoke to me about the good and bad things about the places in their communities. I was impressed by the ways in which these children and young people had been involved in carrying out their own community consultations or in directly assisting in the regeneration of the built and natural environment of their community.

The National Assembly for Wales Children and Young People Committee published its inquiry report 'Provision of Safe Places to Play and Hang Out' in 2010. The Committee note the benefits of Home Zones and noted the historical commitment of Welsh Assembly Government to 'promote the use of traffic calming and Home Zones within existing and new developments to increase the use of residential roads for children's play' (2010:32). The Committee also recommended that 'Children and Young Peoples Partnerships take a greater and more consistent role in driving forward the needs of engagement of children and young people in the planning process' (2010:35). The Committee made further recommendations in relation to the importance of making transport and community design decisions that are informed by the needs and voices of children and young people.

The international community offers some robust examples of what can be achieved when children and young people are seen as integral to decisions about planning and regeneration. The international research initiative 'Growing Up in Cities', was conceived in 1970 as a means to examine the ways in which children use and perceive the environments that shape their lives. UNESCO revived the Growing Up in Cities project in 2002 and this involved material drawn from fourteen research sites around the world. The projects findings suggest that 'the very act of seeking input from children can make an entire community more aware of and responsive to the needs of a minority population in its midst.'⁹

Unicef's Child Friendly Cities initiative¹⁰ promotes implementation of the UNCRC at the level where it has the greatest direct impact on children's lives.

The Framework for Action associated with the initiative are based on four principles of the UNCRC:

Non-discrimination (Article 2) - a Child Friendly City is friendly and inclusive for all children. So it needs to seek out and give special attention to any children who are suffering discrimination in access to their rights. Discrimination affects children in very many different ways - children living on the streets, disabled children, children from minority ethnic or other groups, working children.

Best interests (Article 3) - a Child Friendly City ensures that the best interests of the child are a primary consideration "in all actions concerning children". A first call for children, putting children first, is the hallmark of a Child Friendly City. Most actions of city government affect children, directly or indirectly – so all departments and levels of government need to be aware of and sensitive to the impact that existing and new policies have on children.

Every child's right to life and maximum development (Article 6) - a Child Friendly City seeks to maximize the survival and development of all its children – providing the optimal conditions for childhood, for the child's life now. And "development" in the context of the Convention means children's physical, mental, spiritual, moral, psychological and social development.

Listening to children and respecting their views (Article 12) - Children are seen and heard in a Child Friendly City. Their active participation as citizens and rights-holders is promoted, ensuring them the freedom to express their views on "all matters affecting them" and making sure that their views are taken seriously – in government, in their neighbourhoods and schools and in their families.

The process of building a Child Friendly City must involve children as active, informed participants.

I believe that the regeneration framework put forward in the Vibrant and Viable Places consultation would benefit greatly from a consideration of the application of the UNCRC Articles identified through the Building Child Friendly Cities initiative and could be usefully informed by a similar approach. The Vibrant and Viable Places framework can also play a central role in action to support children and young people who talk about the poor environments open to them in relation to the realisation of their right to play. Article 31 of the United Nations Convention on the Rights of the Child (UNCRC) sets out the child's right to play and to participate fully in cultural life:

1. States Parties recognise the right of the child to rest and leisure, to engage in play and recreational activities appropriate to the age of the child and to participate freely in cultural life and the arts.
2. States Parties shall respect and promote the right of the child to participate fully in cultural and artistic life and shall encourage the provision of appropriate and equal opportunities for cultural, artistic, recreational and leisure activity.

I am therefore asking that the Vibrant and Viable Places Framework be directly informed by considerations of the contribution children and young people can make to this agenda and the potential impacts of the Framework on supporting the realisation of the rights of children and young people in Wales as set out in the UNCRC.

Submission by:
Keith Towler
Children's Commissioner for Wales

103. Community Housing Cymru

Vibrant and Viable Places: New Regeneration Framework
Community Housing Cymru Group response

1. About Us

The Community Housing Cymru Group (CHC Group) is the representative body for housing associations and community mutuals in Wales, which are all not-for profit organisations. Our members provide over 136,000 homes and related housing services across Wales. In 2010/11, our members directly employed 6,500 people and spent over £800m in the Welsh economy. Our members work closely with local government, third sector organisations and the Welsh Government to provide a range of services in communities across Wales.

Our objectives are to:

- Be the leading voice of the social housing sector.
- Promote the social housing sector in Wales.
- Promote the relief of financial hardship through the sector's provision of low cost social housing.
- Provide services, education, training, information, advice and support to members.
- Encourage and facilitate the provision, construction, improvement and management of low cost social housing by housing associations in Wales.

Our vision is to be:

- A dynamic, action-based advocate for the not-for-profit housing sector.
- A 'member centred' support provider, adding value to our members' activities by delivering the services and advice that they need in order to provide social housing, regeneration and care services.
- A knowledge-based social enterprise.

In 2010, CHC formed a group structure with Care & Repair Cymru and the Centre for Regeneration Excellence Wales (CREW) in order to jointly champion not-for-profit housing, care and regeneration.

CREW's central role in Wales is to promote integrated, sustainable regeneration and to ensure that the skills to achieve it are developed and supported. CREW's core mission is to build the capacity of the public service sector, along with its private, community and third sector partners, to deliver integrated and sustainable regeneration in Wales.

To achieve this mission, CREW supports five key objectives:

- To identify, disseminate and support innovation and excellence in regeneration practice in Wales
- To develop, through research and collaboration with key stakeholders a comprehensive knowledge base to inform evidenced based policy and practice in regeneration in Wales.
- To provide technical assistance, training and professional development in support of the Wales Regeneration Framework and the wider skills needs of the regeneration sector.
- To provide a discussion framework, events programme, resource base and networking hub to support regeneration practitioners in Wales meet the delivery objectives of the Homes and Places agenda.
- To forward plan and research emerging and future challenges to facilitate skills development to meet future professional practice needs.

Care & Repair Cymru (CRC) is the 'Older People's Housing Champion'. They are a national charitable body and actively work to ensure that all older people have homes that are safe, secure and appropriate to their needs. There are 22 Care & Repair Agencies covering the whole of Wales. Each agency provides a wide range of services and support for older and vulnerable people, helping them to remain living independently in their own homes and communities.

Care & Repair Cymru is committed to improving the health and wellbeing of older people in Wales by providing advice and assistance with home improvements, adaptations and general repairs. They work in partnership with a number of organisations including Welsh Government, Local Government Housing and Social Care Teams, NHS, Occupational Therapists, third sector organisations such as Age Alliance Wales, the Older People's Commissioner, and housing associations to ensure that older people have access to a range of housing and social solutions that enable them to live in housing that meets their individual needs.

Community Housing Cymru Group response

Introduction

As the membership body for housing associations and community mutuals in Wales, we welcome the opportunity to respond to the consultation on 'Vibrant and Viable Places: New Regeneration Framework'. We have discussed the consultation with our members and our governing body, the National Council has approved the response. This is a CHC Group response but CREW will also be submitting a separate response.

Context

The social housing sector in Wales has changed dramatically over the past five years with a further ten new stock transfers joining V2C, and as a result the wider economic impact of the sector has continued to grow.

We now provide over 150,000 homes and an independent report for 2011/12 shows that 1,973 new affordable homes were built, more than a quarter of the 7,500 target set by Welsh Government earlier this year.

As a sector we have demonstrated that we improve and regenerate local communities on an economic, social and environmental basis. In 2011/12, Welsh housing associations spent £951m, an increase of 16% from the previous year. Almost 80% of that spend was retained in Wales. The amount spent regenerating Welsh communities also increased to £493.2m in the same year, up 14% on the previous year. 57% of the regeneration spend was on repair and maintenance as housing associations bring their properties up to the Welsh Housing Quality Standard (WHQS). Employment in the sector also rose with 7,500 people directly employed by a housing association. For every direct job provided, almost 2 other jobs were supported by the sector. In 2011/12 this amounted to 20,200 full time equivalents across Wales, a rise of 15% from the previous year.

In addition to this activity, the successes of the i2i Toolkit and the Arbed 1 programme are well documented and are projects that have been either led or delivered by the RSL sector. Both projects have pushed the boundaries of what we see in Wales in the context of sustainable investment, maximising the positive impact on our local communities by procuring services and goods locally and ensuring that larger contracts bring added benefits to our tenants and communities through job and training opportunities. The techniques and methods of social procurement have been developed and tested in the housing sector and can provide clear illustration of the potential to regenerate local economies in Wales.

Essentially, we believe that this is regeneration at its most effective and sustainable. In the context of the above, CHC feels that as a sector we have a large contribution to make to the regeneration of communities in Wales and therefore want to ensure that the new regeneration framework is fit for purpose.

General response

We welcome the fact that the regeneration framework is aligning its National Outcomes with those of Communities First and Welsh Government's Programme for Government's objectives, and strongly advocate the key principles of Partnership, Strategy and Sustainability that underpin the framework. However as the framework stands we have concerns about the following areas:

- Profile of housing-led regeneration
- Achievement of whole government approach
- Fit with all other government initiatives,
- Lack of flexibility for bottom up solutions
- Regeneration of Welsh speaking communities

Profile of housing-led regeneration

Whilst reference has been made to the role of housing-led regeneration as part of joined up delivery, CHC feels that the regeneration framework has missed an opportunity to shine a light on the leadership the RSL sector in particular has shown towards regenerating their communities at every level. Over the past few years, the sector has, through collaboration with Welsh government and other key partners, been at the forefront of wider regeneration activity. Our implementation of community benefits into contracts is well documented, along with adopting good procurement practice,

launching Moneyline Cymru and the money advice service, investing in local SMEs and social enterprises and implementing energy efficiency programmes. Our focus has also turned to the health and housing agenda where we are digging out pockets of good practice and in the area of the Aneurin Bevan Trust, for example, a holistic programme of work is being developed that will see efficiencies, better services and local jobs supported. The sector shares the vision of the framework, but we feel that there has been a missed opportunity to move away from the view that regeneration is something that's done to places, that requires a specific budget and requires a separate formulaic structure to deliver. CHC believes that the RSL sector, in partnership with local authorities and Welsh Government, has shown it can be done another way.

Achievement of whole government approach

Following on from the last comment, CHC would suggest that the strategic position of this framework needs to be elevated to sit above programmes such as WIIP if it is to enable the aspirations of the Housing, Regeneration and Heritage portfolio to 'act as a catalyst for joined up delivery across a range of Government departments'. Whilst we very much welcome the aspiration outlined by the Minister, we believe that at a time of such austerity, with public services facing huge cuts but also increasing demand, now is the time to ensure a commitment of action across all departments of Government. The public sector and organisations delivering public services need to maximise their positive impact on Welsh communities through excellent procurement, collaboration and a coherent policy and delivery mechanism.

In essence, we should look at Welsh Government's entire budget of over £14 billion as a regeneration budget and not just the £34m allocated to this specific framework. CHC believes it would be a great opportunity to use the £34m in this budget as a lever to encourage buy-in across Government departments to join up delivery, promote programme bending and develop excellent social procurement practice. The tools, the policies and the know-how exists, so there needs to be a way of ensuring best practice, whether it's a stick or a £34m carrot.

Fit with all other Government initiatives

There are a plethora of initiatives that have been implemented such as the Welsh Infrastructure Investment Plan, Enterprise Zones, Local Growth Zones, City and Region and the impending new round of EU funding programme for 2014-20, all of which aim to regenerate communities, making them vibrant, healthy and sustainable. CHC suggests that there is a real need to reintroduce a Spatial Plan for Wales which can take account of the different initiatives, overcome artificial boundaries and make coherent policy and delivery decisions on a strategic enough level to ensure that all these initiatives are underpinned by the broad objectives and principles reflected in the regeneration framework.

Key legislative development such as the Housing Bill, Planning Bill and Sustainable Development Bill are crucial to the potential success of the aspirations of the regeneration framework. The successes of projects such as Arbed 1 seem too isolated, and there are barriers to achieving similar benefits. If you ask the question, will the adoption of the Regeneration Framework

ensure that the large investment programmes announced in the WIIP and the 21st Century Schools programme achieve good economic, social and environmental outcomes that were seen with Arbed 1, for example?

Lack of flexibility for bottom up solutions

There is concern that the proposed structure for the regeneration framework, particularly the regional boards, will duplicate work on two levels. They could duplicate work of other regional boards but also, as we've referred to earlier, it will duplicate work undertaken under all the other initiatives if it's not all considered under one Spatial plan for Wales.

As mentioned earlier, we very much welcome the national objectives and believe they are broad enough to allow a large menu of initiatives. Our concern lies in the proposal to establish regional boards with responsibility for developing regional and sub-regional strategic plans that have 'control' over the regeneration budget. It is unclear how prescriptive the regional boards' planning, advice and intervention will be and that again we will see the focus being put on regeneration budget of £34m as opposed to the real economic muscle of Welsh Government's whole budget of over £14billion. We would also seek assurance that the regional board structure is not one of command and control, but one of nurturing and enabling local solutions, allowing for innovation and individuals and small third sector groups to access any funding or deliver goods and services. We want to see a strong bottom up approach as this reflects the activity of the RSL sector.

We believe that the specific regeneration funding associated with this framework should be used as a lever to encourage better procurement practice across all public services, and look at ways to ensure that contracts and funding stays in the local community.

Regeneration of Welsh speaking communities

Finally in light of the recent 2011 Census data which shows a decline in Welsh speaking communities, CHC is dismayed that there appears to be no reference at all to the Welsh language in this document. Regenerating rural Wales and areas where Welsh continues to be a community language should be a priority and requires the right policies and initiatives. Many of our members in the RSL sector are leading the way in this area and we would be happy to work with the department to ensure that the general principles are understood and implemented where need be. Gwynedd County Council have announced, in light of the census results, that creating viable, sustainable communities in those Welsh speaking strongholds will continue to be their priority but they call for a 'strong and creative national leadership from the Welsh Government in fields such as planning and housing policy.' We echo that call and would strongly suggest that it be built into this framework

Closing comments

CHC is fully committed to this agenda and has had a representative on the National Regeneration Panel. We would seek to ensure that CHC and the sector continue to have an input at all levels.

Community Housing Cymru Group

January 2013

104. Vale of Glamorgan

Vale of Glamorgan Council response to
Welsh Government Consultation Document
Vibrant and Viable Places - A new regeneration framework
14th January 2013

1. What is your feedback on lessons learnt from delivery to date?

A key feature to date of the Barry Regeneration Area programme has been the combining of regeneration funding with other investment streams to lever in additional investment. Highlights include over £1m of public realm improvements in the town centre, which has unlocked a further £2.8m of investment for the Castleland Renewal Area residential face-lift programme and over £1.5m invested in the Innovation Quarter, helping to secure a new £7.5m, 68 job hotel and restaurant development.

In facilitating the work of the Barry Regeneration Area Partnership Board, the Council has also made linkages with other areas of intervention, thereby adding value to the work of the Board. Examples include making links with the work of the two Communities First areas in Barry, utilising S106 planning contributions to deliver schemes, ensuring that regeneration schemes and activity is linked to procurement of skills and services.

However, in assessing the progress made with the Regeneration Area in Barry, areas for improvement include the need:

- For greater transparency about how Regeneration Areas are identified and how funding is allocated;
- For strategic long-term planning and long-term funding structures at the outset so that projects are developed and delivered to maximise benefits rather than to satisfy short-term funding horizons;
- For governance arrangements which are transparent and fit for purpose with community engagement linked to strategic long-term planning at the outset; and
- For revenue funding and human resources to be available from the Welsh Government from the outset to support the capital allocation.

2. Should other national outcomes or principles be considered?

The strategic national outcomes of Prosperous Communities, Learning Communities and Healthier Communities and the key principles of Partnership, Strategy and Sustainability are supported. However, there remain questions as to how achievable they are given that future capital and revenue funding is expected to be further reduced.

3. What more can be done to achieve greater coherence and cross cutting action across WG departments?

The emphasis in the consultation document on a whole government approach to regeneration is commendable. However, it is unclear how this will be achieved in reality. Presumably, the Wales Infrastructure and Investment Plan for Growth and Jobs both informs and is informed by thinking on City Regions, Enterprise Zones, the Planning Bill, the Active Travel Bill, the Tackling Poverty Action Plan, new regional arrangements associated with Communities First and the new European Funded Programmes for Wales but

which departmental objectives will take precedence? Greater clarity is therefore required from the Welsh Government in relation to what the key national and regional priorities are and how these link with emerging local priorities, thus providing a meaningful framework within which regional and local regeneration initiatives can be progressed. It is hoped that this clarity can be achieved as work on governance progresses in coming months.

4. Do you agree with the national, regional and local approach set out? The approach is welcome in principle; however it would be disappointing if the opportunity was not taken to consider the proposed regional structure alongside the existing demands of collaboration and the need to ensure that duplication is avoided in terms of existing and emerging Welsh Government and local government structures.

The Welsh Government commitment to developing appropriate governance arrangements that facilitate equal involvement of the private, third and public sectors in the development of planning and delivery mechanisms is commendable. However, it is by no means clear how this would work with the proposed Regional Regeneration Boards. For example, would all local authorities be expected/allowed to be represented?

At the time of writing details are awaited on City Regions and their associated governance arrangements and whether the commitment to equal involvement is applied. As stated above, it is hoped that the Welsh Government, when considering the governance of both the Regional Regeneration Board and City Region, will seek to avoid duplication, competition and silo working. Greater clarity would therefore be welcomed on this issue.

It is considered that this is essential to avoid duplication and also to ensure that work on regeneration is fully integrated with issues relating to land use planning, transport investment and skills. It is noteworthy that in the Vale of Glamorgan Council responsibility for driving forward the regeneration agenda is intrinsically linked with transportation, land use planning, investment in skills and Communities First. This has ensured that work on regeneration initiatives both within Barry and the rural Vale are fully integrated with land use planning decisions, the potential use of S106 funding and Communities First initiatives.

5. Do you have any other comments on our proposals for how we will target and direct our funding?

It is unclear how the new approach will work at the regional level in terms of the allocation of funding on a formula basis. Greater clarity is therefore required from the Welsh Government. The Vale of Glamorgan is a non-convergence area and there is a risk that areas of disadvantage, particularly in Barry, will miss out should the regional formula be skewed to match fund the new West Wales and the Valleys convergence area European Funded Programmes. However, in terms of the Vale of Glamorgan, and specifically Barry, there is a great deal to support continued Welsh Government intervention to add value to existing policy commitments and progress that has already been made. By way of example, continued regeneration support would build upon:

- The recent decision to support a Communities First Cluster in Barry with revenue funding of £1.4m.

- The establishment of the St. Athan-Cardiff Airport Enterprise Zone and a Task Force for Cardiff Airport, chaired by the First Minister.
- The good progress made with the Barry Regeneration Area to date with recent and ongoing activity very much focussing on the regeneration of Barry Island, with proposals to enhance the public realm and the visitor experience. This sits alongside the interest that exists in redeveloping the Funfair site and the Council's landholding at Nell's Point. It also highlights the key role of the Island in the Council's emerging Destination Action Plan, the aim being to maximise investment in tourism and visitor activity. This demonstrates the opportunity that exists to support industry led investment in the tourism sector.
- The ongoing work on housing led regeneration with the Castleland Renewal Area in Barry scheduled to run until 2022. To date £2.8m has been invested in residential improvements with regeneration initiatives also delivering improvements to public realm and public spaces, thereby adding value to the work undertaken under both the renewal area and regeneration area banners. £82m is also being invested (up to 2017) on public sector housing in the Vale of Glamorgan to meet the WHQS.
- The progress made in producing a Town Centre Framework for the five main shopping areas in the Vale of Glamorgan, two of which are located within Barry.
- The significant private sector investment in respect of the regeneration of Barry Waterfront – with planning permission having been granted for a new direct road link to Barry Island, which would also serve a large scale mixed use development of a brownfield site. This sits alongside the investment already made by the Council and Welsh Government in the Innovation Quarter including the provision of business offices and workshops, a training centre, a new medical centre, refurbishment to the historic Hydraulic Pumphouse and the new Premier Inn Hotel and Restaurant.
- In addition to the major regeneration scheme at Barry Waterfront, there is also private sector interest in the town centre with private sector schemes having been submitted for the recently closed Magistrates Court in Thompson Street, the delivery of a modern extra care facility at the former Theatre Royal in Broad Street and previously vacant sites in Holton Road being brought into beneficial retail use. This demonstrates the importance of facilitating change in the town centre by diversifying uses which create opportunities to support industry led investment in the construction sector.

Whilst the level of activity in Barry, both public and private led, to date is to be welcomed, it must be recognised that there is a real need for continued regeneration intervention to ensure that momentum is not lost and outcomes are achieved. As a consequence, it is considered that Barry in particular is well placed to benefit from continued regeneration investment to build on work already undertaken and to make connections between areas with development potential and areas of need to ensure that the benefits to the region are fully recognised and maximised.

6. We want to ensure effective monitoring and evaluation of regeneration activities; will the approach set out achieve this?

The approach is welcome in principle; however it must be recognised that any effective regeneration programme is likely to be a long-term process and commitment and that real outcomes may not be achieved for a number of years. It is therefore crucial that the monitoring process is systematic and programmed to ensure that trends can be ascertained and deviations addressed. Councils throughout Wales will need support both financial and human from the Welsh Government to adopt such monitoring processes. Until this is achieved it will be difficult to determine whether the Welsh Government initiatives are achieving their intended purpose and whether value for money is being achieved.

105. Melin Homes

Vibrant and Viable Places – New Regeneration Framework

Firstly, Melin Homes welcome new regeneration framework. As a housing organisation we recognise the impact a range of regeneration initiatives can have on transforming people's lives.

1. What is your feedback on lessons learnt from delivery to date?
Sustainability of a range of the delivery initiatives needs to be examined. How long will the investment have an impact for and what would happen once the investment comes to an end. It is essential to invest in projects with long term viability that maximise economic regeneration. Thorough, on-going appraisal of schemes viability throughout the delivery process should be standard practice. Subsequently we should continue to support schemes that are successful.

2. Should other national outcomes or principles be considered?
The approach looking at prosperous, learning and healthier communities cover the key areas as far as we are concerned. We would encourage the acknowledgement that housing is fundamental to achieving the desired outcomes. There is an opportunity with the forthcoming housing bill to ensure resources are aligned to meeting some of these regeneration outcomes. More should be made about housing within the regeneration plan. The consultation alludes to housing led regeneration but this only covers part of housing's role. Housing investment has many regeneration benefits around health, economic prosperity and environmental sustainability but the impact of good quality affordable housing is far reaching. It underpins prosperous, cohesive communities. Housing sustainability is critical to people's lives, maintaining support networks, a continuous learning environment for children and economic inclusion.

3. What more can be done to achieve greater coherence and cross cutting action across departments?
Regeneration initiatives should not be seen in isolation from any of the main outcomes related to national priorities. Health, housing, education and economic development are interlinked when related to regeneration.

The direct correlation between these priority areas are never fully explored and so work will most likely be carried out in individual areas with limited thought for how this will impact across the board.

Targeted Recruitment and Training and social clauses within procurement process are critical in delivering added value for communities and local business. Organisations such as i2i have championed a deliverable approach to this which can easily be replicated across various public and private sectors.

4. Do you agree with the national, regional and local approach set out? Nationally government needs to play an enabling role or 'stewardship' role in supporting regeneration. Maximising resources and investment takes co-ordination at the highest levels. There is merit in approaching regeneration on a regional basis. Many housing organisations are regionally based and housing markets are not spatially bound.

5. Do you have any comments on our proposals for how we will target and direct our funding?

The proposals are sound and reflect effective models of successful funding. Value for money and sustainability are key for successful funding of schemes and should underpin the approach.

Housing Renewal Area funding could be used in a more joined up way to be more effective. Joining up this funding with WHQS works, energy efficiency measures or heritage funding can have a larger regeneration impact in designated areas.

6. We want to ensure effective monitoring and evaluation of regeneration activities; will the approach set out achieve this?

Results Based Accountability is an effective measuring tool but is limited in scope. The regeneration plan would benefit from a range of measurement tools. Taking this a step further it would be worth setting out a section directly relating monitoring and evaluation of regeneration activities. A universal tool that measure the impact of regeneration schemes and measures their effectiveness would be beneficial.

Especially if this could be used across sectors; with a focus on good practice learning exchange.

Melin broadly welcomes the approach to the New Regeneration Framework. We would urge the final document to have a greater focus on the impact of housing on regeneration, not just through quality and affordability but as an essential platform for people leading successful lives.

106. Neath Port Talbot Council

1. What is your feedback on lessons learnt from delivery to date?

- 'Lessons learnt from delivery to date' has been most recently dominated by our experiences centred around the Western Valleys SRA, which, it has to be said, were mixed.
- On the positive side, it assisted in delivering several excellent projects

within the Borough, however, these were predominantly projects that were Local Authority led. Regretably, however, our experience of community led projects, was that they were less able to demonstrate beneficial outputs.

- The probable reason for this was the shortcomings of the VARP process. Whilst it allowed the Welsh Government, through its officers, to liaise directly with community groups, the partnerships between the two were inadequate, and far greater mentoring was required than was the case in reality.
- This only served to accentuate the gap in effectiveness of the various communities – those with a track record of third sector activity, understandably taking the lion's share of available funding.
- Inadequate funding in itself, meant that too many soft outputs were achieved as opposed to longer term strategic goals, which are required in order to address underlying, deep-seated socio-economic issues.
- NPT therefore welcomes the documents stated intent to address such issues in the future.

2. Should other national outcomes or principles be considered?

- As you would expect, NPT fully supports the Welsh Government's aspirations regarding the Vision and desired Outcomes, as set out in the document, but would make the following observations in support of what we perceive to be the more crucial outcomes, and priority issues.
- As with previous Policy Documents, unsurprisingly there are, as ever, the same recurring themes. The reasons for this, are deep-rooted in a post-industrial legacy, and have resulted in an economically under-performing region, fuelled by a weak labour market, that in itself is hamstrung by a deficit in skills and knowledge.
- NPT therefore believes, that in order to meet the aspirations of this particular policy document, then the Welsh Government needs firstly to tackle these underlying causes, and formulate a strategic response, that would enable their aspirations, such as those set out in Outcome Two, to address the issues outlined above.
- With regards to Outcome One, NPT fully endorses the Welsh Government's recognition of the requirement to support our Town Centres, which is a well established Regeneration strategy of this Authority, having seemingly stood alone in resisting Out-of-Town Retail. We would therefore be keen to receive confirmation that the policy will not simply be the injection of capital into town centres that have been devastated by out-of-town Planning Policies, but rather, that there will be a structured, revenue backed policy in order to support existing centres, which are striving to overcome the difficulties they are faced with in these challenging times. We therefore welcome the Welsh Government's intentions to explore such initiatives as BIDs.

3. What more can be done to achieve greater coherence and cross cutting actions across departments?

- NPT is of the opinion that it lies with the Welsh Government to lead by example regarding these issues. In addition to Vibrant and Viable Places, the theme of Regeneration itself 'cross-cuts' two other recent policy statements, namely the Regional Planning Framework, and City Regions.
- Regardless of this, there have been three separately timed announcements, and we still await clarification regarding City Regions, even though it has obvious connectivity to Vibrant and Viable Places.
- Despite an instinctive tribalism, Local Authorities in the Region have repeatedly demonstrated their willingness to embrace collaborative working in a coherent and joined-up way on various issues, including Regeneration.
- The Welsh Government now needs to demonstrate that it is able to do the same, across its own Departments.

4. Do you agree with the national, regional and local approach set out?

- This is a difficult question to answer, in so much that Local Authorities have been given little, if any, information regarding the constitution and governance arrangements of the proposed new structure for delivering Regeneration.
- In particular, a fundamental ingredient in the future of Regeneration in Wales, will be the formation of the new City Regions – yet we still await clarification and detail.
- We are comforted by the recognition in this document of the assumption that Regeneration is 'fundamentally a local issue'. We therefore await with anticipation, to learn what the role and representation of Local Authorities will be on the proposed Boards.
- Reference is also made in the document to a 'bottom up approach' and likewise, this is welcomed by NPT. Again, we await with interest to see how this commitment will fit in with the formation of Regional Boards.
- The existence of the Welsh Government itself, is the product of the policy of devolution. NPT hopes therefore, that despite a new regional tier of governance, devolved authority will also remain at a local level, and the autonomy of Councils will be preserved.

5. Do you have any comments on our proposals for how we will target and direct our funding?

- We believe that the funding should be targeted at areas where it is most needed. That said, we recognise that 'need' has several connotations. At NPT, we are all too aware of the need of our most deprived communities, and obviously welcome financial investment in these areas, where there is a meaningful and structured objective with meaningful and targeted outcomes. Running parallel with that need however, is the 'need' of exemplar businesses and projects in order to enable them to fulfil their potential.
- At NPT we have counter-acted the effects of a contracting

manufacturing sector, by investing in the provision of opportunities for high-tech Engineering and R&D companies. Namely, the already well established Baglan Energy Park, and the newly emerging Harbourside area of Port Talbot amongst others.

- With the arrival of the second campus of Swansea University as well, there is a real opportunity to invest in institutions and sectors that will provide the much needed knowledge and skills previously referred to.
- Essentially, NPT would wish to see funds directed to support sectors of success, and not just areas of economic failure.

6. We want to ensure effective monitoring and evaluation of regeneration activities, will the approach set out achieve this?

- NPT of course welcomes the high levels of accountability proposed by the Welsh Government in this document.
- At the same time however, it asks that there is a recognition that Regeneration is not always a quantifiable science.
- There needs to be a degree of flexibility therefore, in the way in which outcomes are measured.
- Regeneration by its very nature often requires speculative investment in order to achieve long term goals. We feel that it would be a mistake to revert to the experiences of previous short-term policies, which are driven by rigidly defined outcomes, at the expense of long term strategic objectives. Accountability, tempered with a realistic pragmatism, is therefore what is required.

107. SEWEF

Introduction

The South East Wales Economic Forum (SEWEF) is a unique partnership in South East Wales bringing together the region's ten local authorities, the Welsh Government (WG), the private sector, universities, further education and the third sector to address regional economic matters. SEWEF's geographical area encompasses Cardiff and reaches from the local authority areas of Bridgend County Borough Council in the west to Monmouthshire County Council and the English/Welsh border in the east, and north to the Heads of the Valleys authority areas.

SEWEF welcomes the opportunity to contribute constructively to the WG's Vibrant and Viable Places consultation, and has (together with a number of its member organisations) attended the recent regeneration summit in North Wales and the workshop held in Merthyr. We believe that the comments below echo many of those expressed at such events.

While SEWEF recognises that Vibrant and Viable Places relates to the whole of Wales, this response necessarily focuses on South East Wales.

SEWEF Response

SEWEF has responded to a number of recent Welsh Government consultations – most notably in this particular context that relating to City

Regions. Moreover, given the possible implications of potentially conflicting proposals on future governance and delivery we have worked closely with the Welsh Local Government Association (WLGA) in order to produce a collaborative and fully inclusive solution to the problem of a regional economic development and regeneration policy vacuum.

The Vibrant and Viable Places consultation document does a good job of summarising the composition of existing policy impacting on regeneration in Wales but does not itself provide strategic direction or vision. Indeed, the proposal for three new regional regeneration boards is likely both to underpin the existing policy 'silo mentality' and add another layer of bureaucracy which will be difficult to service.

Regeneration is almost exclusively the domain of the public sector – or at the very least led by the public sector – and driven/influenced to a significant extent in Convergence areas by European funding. While there have been some positive efforts in recent years to encourage strategic collaboration, competition for Convergence funding has frequently had unintended consequences (and not just in the regeneration field) in that localism without regard to 'the bigger picture' has remained strong, and has adversely effected the need for genuine regional coordination⁴⁰.

In the light of potentially competing policy initiatives, the national, regional and local approach set out in Vibrant and Viable Places is not likely to be effective in practice in South East Wales. Too many bodies will be created, and the scope for administrative duplication and confusion, not least as perceived among the general public, will be greatly increased. Rationalisation – the best possible use of resources – is therefore required to ensure coherent, accountable governance structures and decision-making at the regional level in order to provide an effective link between the national and the local.

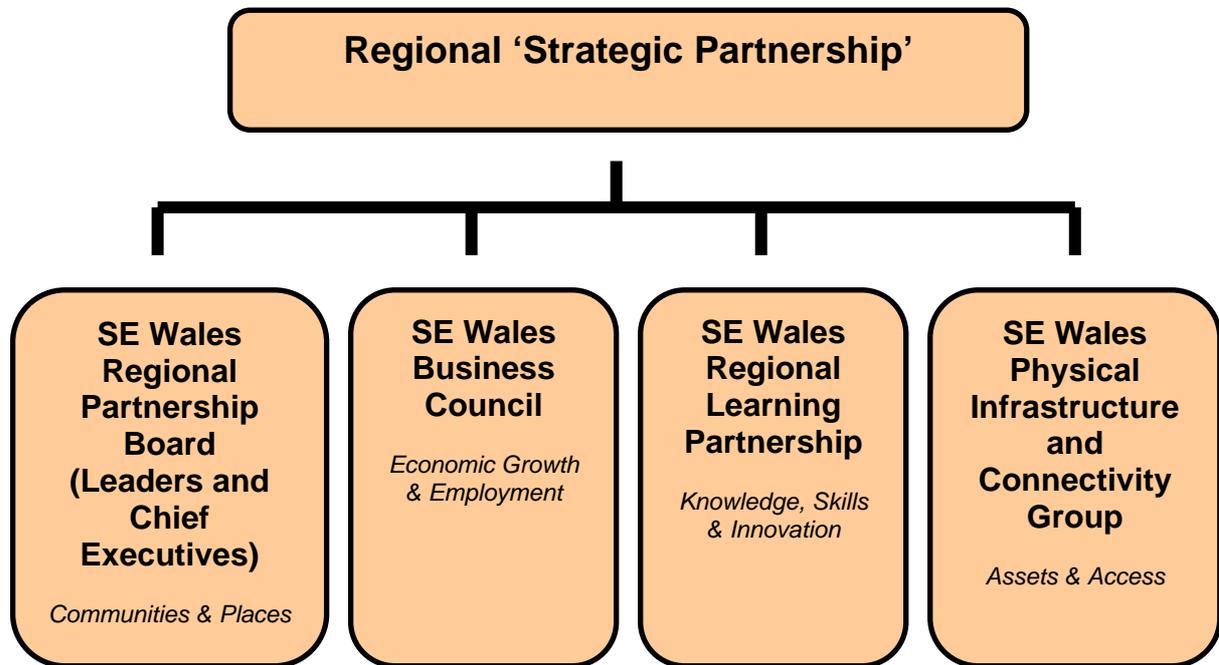
The Proposal

There is a strong perception in the regeneration and economic development fields of a damaging disconnect between the national strategic level and those expected to actually deliver strategy 'on the ground'. The region is the crucial link, therefore, and this is why SEWEF and the WLGA are proposing a single new governance approach both to the City Region and regeneration (including Communities First) – particularly since the relevant administrative boundaries are likely to be similar in South East Wales – that will create an integrated, inclusive system understood by all key stakeholders. The aim will be to achieve for the region:

- a clear and agreed sense of purpose and vision which is realistic and implementable
- effective linkages between the economic, social and physical elements of development
- an effective delivery mechanism
- projects that have the desired outcomes and outputs in terms of the region's economic viability and vitality
- genuine engagement with and between the appropriate partners

⁴⁰ There is also a case for arguing that an imbalance between capital and revenue spending regarding regeneration activity, in favour of the former, has been the result of localism winning out over regionalism.

The following structure is designed to enable the strategic leadership and delivery required to build a strong, sustainable economy, leveraging the strengths of both city and the region as a whole to increase prosperity and employment:



The detail below focuses on the aspects where SEWELF's experience can be most valuable, namely bringing together the private, third and higher/further education sectors with the public sector to constructively contribute to regional policy delivery. Each body within the structure will develop clear, complementary work plans with objectives/projects to deliver to specified timeframes.

The South East Wales Regional Partnership Board (existing) consists of the Leaders and Chief Executives of the 10 local authorities. They will provide the political steer at local level (WLGA to coordinate).

A Regional Learning Partnership for South East Wales (new). In South West Wales a very effective learning and skills partnership has been established and it is proposed that a similar partnership be established in the South East to drive the skills, entrepreneurship and innovation agenda. This will require linkages to be made with the Business Council to ensure that key skills gaps are being addressed through the development and delivery of appropriate qualifications and training programmes. Membership should include all elements of the education sector and the sector skills councils (Coordinating role required).

A Physical Infrastructure and Connectivity group (new). This will bring together a number of key agendas associated with the physical infrastructure and environment i.e. Highways and Transportation. A key component here will be the improvements to the rail network and ensuring that the benefits for the region are far reaching and deliver the regeneration required. Digital

Connectivity and Energy and Efficiency will also be key components of this group. (This may involve a Joint Transport Authority or Passenger Transport Executive, and SEWTA's role and functions will be part of it.)

South East Wales Business Council (new). The private sector has a pivotal role in both defining and delivering the required economic outputs. This cannot just be a talking shop: it has to be results-orientated. The Council will play a fundamental role in

- i. Establishing the economic and regeneration action priorities for the region. It will harness its private sector members' knowledge in relation to economic investment, aligning this with the work of SEWDERB, SEWTA, CRT and HEW/HEFCW to create a coherent whole. This will involve contributing to and ensuring alignment with local initiatives such as Cardiff Council's proposed new economic development strategy and to national ones such as the Council for Economic Renewal.
- ii. Developing a regional approach to tackling skills requirements for employment prospects, bridging the gap between supply- and demand-led policies. This will build on the CBI's Rebalancing the Economy and Colour of Growth: Maximising the Potential of Green Business initiatives, South Wales Chamber's business support and internationalisation work, the universities' regional strategy, anchor company requirements and forecast skills requirements for planned projects of regional significance, and will require interfacing with the proposed Regional Learning Partnership.
- iii. Ensuring that external promotion of the image and profile of South East Wales is carried out in a way that resonates with business. The Business Council should commission independent research (as recommended in the City Regions report) to identify economic strengths and weaknesses from an external perspective. This will build on the work initiated by Capital Wales with its partner organisations, identifying and elaborating on the city region's USPs to attract interest from external investor companies and financial investors. This will also provide a strong regional 'story' for use by UKTI and the WG in their FDI campaigns.
- iv. Brokering relationships between sectors on major regional regeneration projects, such as the Valleys Metro or the Severn Barrage, supporting bids for European funding for major regional regeneration projects, acting as the liaison point with business in the Swansea Bay City Region and interfacing with the Physical Infrastructure Group.
- v. Establishing the business case for an independent economic research institute to provide relevant and robust regional data which will underpin the city region's strategy, business case and funding bids.

The Chair of each of these groups would sit on the Regional Strategic Partnership. Ideally, this would be co-chaired by a Minister for City Regions and the Minister for Housing, Regeneration and Heritage. This will ensure that all interested bodies are taking the hard decisions necessary to identify and act on economic priorities and are working to a single agenda, delivering the key principles emerging from the City Regions report, Vibrant and Viable Places and Communities First. The Regional Strategic Partnership should

also have responsibility for deciding the regional plan and delegation powers for implementing delivery of it to the relevant partners.

The inclusion of all sectors – crucially the private sector (which would add value to social enterprise, an increasingly influential element in regeneration) and education and skills provision (at all levels and commonly recognised to be of fundamental importance) – underpins our proposals and will help encourage cross-departmental communication/ cooperation across WG departments. (Our proposal also fits readily into the WG's Wales Infrastructure Investment Plan process, increasing its chances of being successfully embedded in WG policy delivery.)

Conclusion

Notwithstanding the fact that SEWEF will cease to exist with effect from April 2013, it has in the past played a unique role in the way it has brought all the appropriate sectors together – including, notably, the manner in which it has accessed private sector knowledge and expertise – and influenced the WG in a way, and at a level, that individual members could not. It is important that its breadth of membership, is not lost with its dissolution, particularly in relation to the City Region and regeneration agendas, and we believe our proposal is the best way of ensuring its unique character is transferred into the new South East Wales regional governance structure.

108. Central and South West Wales Regional Partnership

Vibrant & Viable Places – New Regeneration Framework
A Welsh Government Consultation Document

Response On Behalf Of The Central & South West Wales
Regional Partnership

Each of the Authorities forming the C&SWW Regional Partnership has been invited to comment on the above document, and they will have forwarded their individual, separate responses. Additionally, the Region has agreed to provide a collective response that reflects a regional overview. What is set out below, represents the general views shared across the Region.

In order to avoid simply repeating of individual replies, it has been attempted to extract some common themes, comments and concerns.

Generally, the document has been well received, and each Authority has been grateful for the opportunity to be part of the consultation process. A summary of their observations are set out below :-

Positives

- The partners welcome the move away from more recent short term initiatives, with their short term gains, and fully endorse the proposed adoption of longer term strategies, which will leave a meaningful legacy.
- They welcome the commitment to a more holistic approach to Regeneration for the region.

- As expected, the 'Vision' and the themed 'Outcomes' are fully supported by all Authorities.
- The Outcomes are generally regarded as being clear and precise, whilst also being ambitious and challenging.
- The respective Authorities welcome the opportunity to embrace more collaborative working, and build upon the relationships which have already been formed through established regional collaborative working practises.
- They are generally pleased that the document it is reflective of the current challenging economic climate, and the task ahead, as far as Regeneration in the region is concerned.
- The emphasis on Town Centre regeneration is seen as being crucial to the documents overall vision and strategy. Every one of the six Authorities recognises the challenges that Town Centres are facing within their own administration, and are extremely keen to adopt strategies which will help to re-establish their standing, and combat the pressures from out-of-town retail centres.
- The greater emphasis on identifying and monitoring outcomes is generally seen as a positive, though flexibility is still required in order to achieve long term goals and objectives.

Concerns

- A common theme to the submissions was the lack of information regarding City Regions, and how these would fit in with the future direction of Regeneration in the area. Each Authority is awaiting with interest to see how the City Regions will dove-tail with the proposals set out in this document
- Opinions were ambivalent regarding the formation of a new tier of governance at Regional Board level, but a concern across the parties is how Local Authorities are going to fit in to the new arrangements, and more crucially, how they would be able to deliver their local leadership role.
- Whilst an alignment to Communities First clusters was generally welcomed, there was concern that it would leave large gaps, particularly in more rural areas. This is of particular concern to certain Authorities in particular, when coupled to an emphasis on Town Centre regeneration, as opposed to rural areas.
- It was felt that there was not enough reference to worklessness and job creation within the stated Outcomes.
- Similarly, transportation infrastructure was generally overlooked, and it is the opinion of the group that this will form a vital element in the strategic Regeneration of the region.
- The National, Regional and Local approach was generally welcomed, but concern was raised regarding the possibility of duplication, and how interfaces between levels would work. This will need to be more closely considered when greater detail is forthcoming.
- The delivery of Regeneration belongs at a local level, and perceived unnecessary intervention and approvals at various levels might curtail

this ability to deliver, whilst reducing flexibility and increasing time-scales.

General Comments

- There is a need for simplified and transparent governance structures.
- The Welsh Government needs to 'lead by example' and adopt a transparent working methodology, which cuts across Ministerial departments.
- Expectations need to be managed, and be realistic and achievable.
- A two pronged approach is required, with the requirement for tackling poverty and deprivation running in parallel with the need to further promote areas of innovation, achievement and success.
- Good open communication and genuine partnership working is a fundamental requirement, if these proposals are to have a chance of working.

As previously stated, there are many more positives, concerns and general comments contained within the individual submissions, with those outlined above reflecting the Regions common observations.

109. All Wales Chief Housing Officers Panel

AWCHOP Consultation response

Vibrant & Viable Places : New Regeneration Framework

AWCHOP exists to present the views of the 22 Welsh Local Authority Chief Housing Officers.

Among it's key aims, AWCHOP seeks:-

- to act as the consultation body for Chief Housing Officers in Wales;
- to develop and maintain a high profile for Local Authority housing activity and purpose within Wales and promote continuous improvement in the sector;
- to act as a scrutiny and discussion forum, to review and develop Welsh housing policy and to influence the legislative bodies to adopt the organisation's proposals ;and
- to support and encourage National Housing Networks.

AWCHOP welcomes the opportunity to respond to the consultation on issues and proposals contained within Welsh Government's consultation document 'Vibrant & Viable Places'. The consultation response is structured around the consultation questions outlined within the document.

What is your feedback on lessons learnt from delivery to date?

The positive lessons learnt from housing-led regeneration, and wider housing activities appear to be underplayed in the section reviewing recent and historic practice. In particular, there is scant recognition of the considerable impact and learning associated the considerable work programmes associated with WHQS over the last decade and more. These programmes, implemented by

local authority and RSL landlords all over Wales have been instrumental in delivering significant improvements, not just to individual tenants homes, but also to the wider community environments within which those homes exist. Similarly, the decisions made by local authorities through their strategic housing and planning/development roles in relation to the location, type, tenure mix and design of any new housing developments, aimed at increasing overall supply have considerable impacts in relation to regeneration within many areas.

Although recognised as an example of area-based housing-led regeneration, housing renewal areas have made significant contributions to the regeneration of many areas of privately owned housing in Wales over a number of years. There are a number of evaluative studies available which could provide positive evidence of the direct and indirect benefits of this approach.

Should other national outcomes or principles be considered?

Is there a clear enough focus on housing in the suggested outcomes?

What more can be done to achieve greater coherence and cross cutting action across departments?

It is also important to appreciate the role of local authorities as landlords, and the relationship that exists between local authorities and their tenants, and wider communities.

Do you agree with the national, regional and local approach set out?

The consultation proposals do not make a compelling case for the establishment of regional boards. The proposed role of ensuring “that local plans work towards the achievement of national outcomes” can equally be performed at a local level. There are important issues of democratic accountability to be considered in relation to any proposals straddling more than one local authority area, and these are not addressed, or recognised in the consultation proposals.

If a regional approach is to be adopted, it may be appropriate to consider whether or not there are any pre-existing regional structures or bodies which could fulfil this role, rather than establishing an additional set of separate regional arrangements.

Do you have any comments on our proposals for how we will target and direct our funding?

The lack of clarity around the future of housing renewal area funding is unsatisfactory. While agreeing with the principle that maximum outcomes should be achieved from this, and all other funding, there is a considerable body of evaluation demonstrating the benefits accrued through the use of housing renewal areas in Wales and elsewhere. Currently, both Welsh Government and AWCHOP are contributing to a further evaluation study of the approach. Ideally, the outcomes from this study should be utilised in considering the future of renewal area funding. Both AWCHOP and the Housing Technical Panel would be very keen to contribute to any consideration around the future of housing renewal funding.

It is important to achieve an appropriate balance between urban and rural regeneration. It is not clear from the project evaluation criteria, presented on Page 33, how this balance would be achieved and maintained.

We want to ensure effective monitoring and evaluation of regeneration activities, will the approach set out achieve this?

The focus on Results Based Accountability as a methodology for project and programme evaluation is welcomed.

Robin Staines, AWCHOP Chair
JANUARY 2013

110. Consultants in Public Health Group

COMMENTS

1. We are supportive of the rounded and holistic approach taken in this consultation document.
2. We are pleased that you include the important link with health and health care.
3. The public's health is determined by interlinked socioeconomic and environmental factors. And similar factors affect the economy and the success or otherwise of economic regeneration.
4. The public's health tends to worsen as areas become more and more socioeconomically deprived. There is a gradient of worsening health in Wales. And health in Wales overall is amongst the worst in Europe. The very worst population health is found in the most deprived areas of Wales. These same areas also tend to be the most in need of sustainable economic regeneration.
5. The poor population health witnessed in our deprived areas can itself directly hold back economic generation. Existing chronic ill health and disability, largely caused by a longstanding interlinked mix of
 - depressed macro and micro economies
 - low and unequal income and wealth
 - poor housing and homelessness
 - high unemployment and a high level of economically inactive population
 - low quality jobs
 - low educational and vocational skills achievement
 - a degraded local urban and natural environment
 - poor access to high quality services and amenities
 - barriers to walking, cycling and using public transport safely and cheaply
 - limited affordable access to sports facilities and healthy food
 - easy access to alcohol, other drugs of misuse and unhealthy food
 - weakening social networks, community and cultural activity
 - poor personal 'life' skills
 - etcetera

In a vicious circle, this high level of poor health limits the ability of any personal and societal efforts to influence and improve these health factors.

The detrimental factors remain and affect the next generation's health and economic wellbeing. And so on.....

6. So by linking health improvement and economic regeneration from the outset, improving socioeconomic and environmental factors can lead to improved public health and successful economic regeneration in a virtuous cycle.
7. We suggest that the links and common aims mentioned above should be explained and made more explicit at the beginning of your document.
8. Your emphasis on communities is welcome as are your proposed partnership, national, regional and local approaches. This is exactly how we approach our efforts to improve the public's health
9. Whilst the bottom-up approach you mention is desirable, especially for the community and local partnership levels, initiatives developed by them and regionally also need to fit and integrate with national strategy, vision and objectives. Perhaps this could be more explicit in the document, along with some details of how that might be achieved.
10. In particular, the partnership approach with local authorities is welcome. We suggest that this should operate through existing local partnerships. Local authorities are already involved in most of these. And this approach would build on existing local relationships and avoid duplication. Local authority sectors such as housing, planning, transport have a large impact on public health.
11. NHS health boards have an important local public health role. Public Health Wales provides significant expertise in public health to the seven local health boards. Along with health board Directors of Public Health, and, like local authorities, our local public health professionals have long established places within numerous local partnerships. Public Health Wales also has close links with Welsh Government mainly through the Chief Medical Officer.
12. Given the links we have described, we suggest that most economic regeneration policy development and initiatives - locally and nationally - should have high-level public health expert input from the outset.
13. For example, one practical method of facilitating public health input to economic regeneration is Health Impact Assessment. Public health professionals could provide technical expertise to facilitate them.
14. We welcome your recognition that the local NHS is a major component and driver of the local economy – the biggest in some areas. We agree that the NHS is important for employment and training opportunities; that the location of services affects access and transport demand; and that procurement can be vital for local and national businesses. There is considerable scope here to capitalise on this within economic regeneration initiatives. This should be emphasised in the document.
15. The majority of the population do not exercise to recommended levels, especially in the most deprived areas of Wales. We welcome your assertion that increasing sports and leisure infrastructure and participation can improve economic regeneration and physical activity, through employment and potential public participation. This can also provide further opportunities for NHS exercise referral programmes, for example. However, some sports facilities may be inaccessible to the inactive population. They can also inadvertently increase motor traffic. Whilst

regular sports participation should be encouraged for health reasons, the inactive majority of the population will only increase their physical activity in large numbers, over the longer term, through active travel on a daily basis – this means an urban environment that prioritises high quality public transport, walking, and cycling on the existing and new road network and in neighbourhoods. Such spatial planning and transport infrastructure also has sustainable positive effects on economic development and regeneration, as well as other health benefits.

16. We commend the emphasis on town centres. Out-of-town developments have harmed the economy and vibrancy of town centres and increased car-use whilst decreasing walking and cycling. This has led to a lack of accessibility to healthy food for people without cars. At the same time unhealthy food-outlets have boomed in town centres. Alcohol and drunkenness in town centres has seriously affected their economic development, vibrancy and safety. Binge drinking leads to longer term ill-health as well as violence. It harms families and children, increases days off work and so further damage to the economy. Alcohol places a very large burden on the NHS. We feel that a greater link to effective public health interventions that reduce binge drinking in town centres should be included. Amongst other factors, planning and licensing are important in relation to alcohol outlet and food outlet density and opening hours.
17. We agree with your statements that NHS health care has an important preventative role and that this is important for public health and the economy. This fact should remain in the document, but we feel that you should emphasise that the socioeconomic and environmental factors described above have the most effect on health, complementing the lesser effect of NHS health care.
18. Cross-referencing other sectoral policies and strategies: In the introduction, we suggest that greater emphasis is needed on how economic regeneration and public health improvement fit-in to the more overarching national themes of the Welsh Government statutory duty of sustainable development; the government's programme; economic policy; spatial planning; the Wales Infrastructure Development Plan; and so on.
19. We have stated the links between public health and economic regeneration. It may be helpful in your document to cross-reference to certain specific Welsh Government health policy and proposed legislation to this effect. This would include the current Public Health (Wales) Bill, Together for Health, and Our Healthy Future. This level of policy sits underneath the over-arching themes of stated in our paragraph 18 above. Further links could also be made to current related policy documents in housing and transport at this level.

111. Countryside Council Wales

CONSULTATION:

Vibrant & Viable Places - New generation Framework

Response of the Countryside Council for Wales

1. What is your feedback on lessons learnt from delivery to date?

We share the WG assessment of the limitations of Regeneration Areas concerning the displacement of funding and timing issues, selection criteria, spatial boundaries and the involvement of the private sector in planning and delivery of projects.

2. Should other national outcomes or principles be considered?

Communities and planner should have a full appreciation of how they depend on the natural environment and how that those natural resources provides them with economic and social benefits. CCW believes that this appreciation should be fostered in all regeneration initiatives. CCW has itself, for example, through the European funded strategic project, Cymunedau a Natur/ Communities and Nature, sought to promote this both within local communities and within the mindset of those who put forward projects to improve the environment and provide visitor facilities. We are currently working with the Living Wales Programme on implementing the ecosystem approach and we believe this will provide the framework to uncover this local value of the environment.

Crucially, it is important that regeneration is not merely carried out in communities but that disadvantaged groups within communities should be given appropriate opportunities to be engaged in that regeneration process. In Communities and Nature this is done largely through making provision for work experience schemes, on-the-job training and volunteering opportunities an essential component of all projects.

Sometimes this is done directly by project developers; in other cases it is achieved through the incorporation of social clauses within the procurement process.

3. What more can be done to achieve greater coherence and cross cutting action across departments?

Information portals such as, PlanET Health Cymru, managed by Public Health Wales is one way greater coherence and cross department working could be achieved. The PlanET portal links information between Health, Planning, Transport and Environment, and is an important stepping-stone in identifying links. The Wales Outdoor Health Forum (managed by CCW), which was initially developed through targets in Creating an Active Wales, also provides a connection between departments. There needs to be a willingness for different departments to work together, and both PlanET Health Cymru and The Wales Outdoor Health Forum, may help to facilitate these connections. Health Impact Assessments are a useful tool in the assessment of impacts of regeneration programmes.

Page 21 mentions that the new Natural Resource Body for Wales (now named "Natural Resources Wales") will be charged with close engagement with local communities. It may be of interest to note that CCW has currently two initiatives in operation that include models for engaging communities in environmental works. The first is Communities and Nature, mentioned above. The second is Come Outside!, which specifically targets hard to reach groups.

4. Do you agree with the national, regional and local approach set out?

Yes, for the reasons stated in this section, in particular, recognising that regeneration is a local issue, and that economic activities are not confined to local authority boundaries and that Government should set a strategic steer to achieve national outcomes.

The approach to regional level coordination, is one that has proved successful in the Valleys Regional Park programme.

See response to question six for comments regarding concerns about how change will be evaluated across the three approaches.

The proposal for the National Regeneration Panel to be converted into a formal Ministerial Advisory would ensure greater coherence and accountability.

5. Do you have any comments on our proposals for how we will target and direct our funding?

Page 31-2 outlines the “Successful Places” investment stream and the aspiration that this would draw on European funds. Page 33 (Section 6.5ii) sets out criteria for evaluating proposals. CCW suggests the following important additional criteria:

- a) Viability of plans for creating new jobs and mechanisms for recording that align with the Wales European Funding Officer (WEFO) requirements;
- b) the same point with respect to creation of new enterprises.
- c) Proposals for including disadvantaged groups in the implementation of projects (e.g. through work placements; on the job training; volunteering).
- d) Depth and extent of plans for community engagement should be assessed.
- e) Plans for promoting improved appreciation of the natural and cultural environment (e.g. through outreach, interpretation) should be an inherent component.

With respect to a) and b) , the WEFO evaluation framework and indicator definitions are helpful tools for the realisation of jobs and enterprise creation and could usefully be brought in at the early stages of formulating proposals for regeneration projects. In CCW’s experience, it is vital that plans for the realisation of key results such as the creation of jobs do take time to implement but that they need to be set out early on in order to allow time for refinement and nurture.

With respect to c), CCW has made it mandatory for those submitting bids to the “Communities and Nature” strategic project to include plans for engaging disadvantaged groups in project activities. CCW has devised formal criteria for assessing and scoring these. To date, this approach has been successful in stimulating project developers to think about the ‘human’ side of regeneration and the actual communities that the regeneration work is going to take place in.

There is a need to consider the displacement effects at the local and national level of direct funding. Although an evaluation matter, it would be beneficial to consider what would have happened without the intervention by comparing similar areas not targeted by the policy.

6. We want to ensure effective monitoring and evaluation of regeneration activities, will the approach set out achieve this?

Overall, there is very little detail in this section, particularly regarding how monitoring and evaluation will be undertaken, and by whom. There should be recognition of the need for adequate resources, in terms of both skilled evaluation staff and budgets. Timescales are crucial, as evaluation needs to start before a project begins (in order to provide a baseline) and to continue for a significant period after the project ceases as impacts often take time to arise.

Secondly, there is no integration of evaluation at a national level (see Section 6.2.iii), at the regional level (section 6.3.i) and the project level (section 6.6.i). This needs to be addressed through the development of a proper monitoring and evaluation framework, covering all three levels from national strategy to business planning and project delivery. This should be in line with the guidance on evaluation provided in the Magenta Book. A separate economic evaluation should be undertaken for projects focused on increasing visitor number. The Tourism Satellite Account approach, promoted by Visit Wales, provide a robust basis for evaluation of this dimension.

CCW January 2013

112. Ceredigion Sustainable Futures Group

The Ceredigion Sustainable Futures Executive Group response to the Vibrant and Viable Places a New Regeneration Framework consultation document. The Ceredigion Sustainable Futures Executive Group welcomes the opportunity to respond to the Vibrant and Viable Places a New Regeneration Framework consultation document.

Ceredigion Sustainable Futures Executive Group is a recently formed group supporting the work of the Ceredigion Local Service Board across the key outcome areas of economy, life long learning and environment and brings together work on these themes in the County from stakeholders in the private, public, voluntary and community sectors.

The Group agrees that it is timely and appropriate for a fundamental and wide-ranging review of the approach adopted by Welsh Government. Because, as the consultation document recognises, regeneration is achieved through partnership and is 'everyone's concern'. It is perhaps regrettable that the policy review that was undertaken earlier and although reported in the Preface to this document, was not itself taken forward through a fully transparent open public consultation exercise.

It is particularly helpful that the Framework acknowledges the wide basis of regeneration, set out in a definition based on economy, people and the environment and that the document seeks to present a whole government approach. The relevance of a 'place-based' approach to the Welsh Government's "focus on people" and to achieving better outcomes through joining up working at all levels, national, regional and local is important.

The document emphasises the very wide policy scope – much wider than simply town centre renewal, or the commitment to this work set out in Chapter

9 of the 'Programme for Government, Tackling Poverty' that that will be needed to achieve successful and enduring regeneration outcomes. Despite the lack of a specific commitment to 'place' in 'Programme for Government', this consultation highlights the need for regeneration and a place based approach to be adopted almost as a 'cross cutting' approach across all twelve policy areas but this New Regeneration Framework needs to highlight the special role of regeneration as the place focussed delivery of all aspects of Welsh Government's Programme.

The Group welcomes the intention for the document to provide:

- New national outcomes;
- A well evidence and evaluated people and place based approach;
- A strengthened national, regional and local framework; and,
- A commitment from Welsh Government to work in an integrated way across departments and portfolios.

But the Group has concerns as to how these themes can be developed in a sustainable and enduring way. These concerns relate not only to how these themes are developed within the Framework, but also that there remains considerable work to specify how this can be delivered successfully, locally, regionally and nationally.

The Framework lacks a critical examination of the rationale for interventions in town centres and seaside towns. Clarity is needed as to what is the intended outcome of the intervention and whether it can / has actually been achieved. In the current economic climate, additional town centre spend and additional growth / indicators are extremely difficult to achieve and evidence.

In the absence of growth, interventions seeking to regenerate one place will often displace spend and activities from other nearby centres. Such renewal activity does not grow the total spend / footfall / participation within the region or within Wales and may represent poor value for public money. The commitment to work on this agenda regionally and nationally does little to explain a whole Wales approach to evidence real growth and value achieved rather than simply fuelling competition and displacement. To achieve better overall outcomes in the current climate, consideration needs to be given to reducing or restructuring centres to create real opportunities for growth and public sector support.

An alternative approach would be to focus Welsh Government actions more sharply on achieving significant additional growth in wealth and jobs across Wales so as to create real opportunities for town centre development. The document does not evidence evaluation of any alternative approaches.

Although throughout the document Welsh Government programmes are referenced and highlighted as relevant to regeneration, the document overall fails to map the close relationships existing and needed between all programmes to progress successful regeneration and achieve worthwhile outcomes. In the 'Context' chapter, the lack of a single coherent National approach is apparent. The document responds to the current lack of a National and or regional framework and sets out arrangements that go only part way to addressing this. It is noted that the summary of the findings of the independent evaluations of the current activity fails to acknowledge this.

The findings of the independent evaluation are just that and seek to explore the current approach rather than a rather more broadly based evaluation of

how the current approach meets the needs and achieves the outcomes required to deliver regeneration across Wales.

There is insufficient attention given to:

- Clarity of outcomes; the summary of current activity highlights for the most part expenditure sums; not achievement of real regeneration outcomes that make a difference.
- The achievement of real regeneration outcomes nationally; the approach will fail if it is too targeted.

The commitment to Results Based Accountability™ is particularly welcomed in this regard as it will have the potential to address the above. However to fulfil this potential, RBA needs to be implemented throughout and form the basis of the Framework through outcomes, indicators and strategy as well as giving performance accountability.

The draft Framework does not provide an overarching review of any State aid issues arising, nor is there an analysis of the opportunity to notify the final Framework so as to streamline these considerations, simplify delivery and reduce local risks.

Despite the local and regional levels proposed and the strong public sector focus for much of this work with local authority leadership, there is no reference to the potential role of the local service boards. On page 27 there is a reference at regional level to an integrated Community Strategy. These documents owned by local service boards are now in the final stages of being replaced by Single Integrated Plans that come into being in April 2013. There are presently no arrangements to integrate these into three regional plans to cover the whole of Wales.

Despite the reference, in the 'Overview' to sustainable development as a central guiding principle and in section 5.2 on page 14, to sustainability, the theme is not developed in the document. Although sustainability is referred to as an evaluation criterion, there is no explanation of in what way it will be interpreted or how it will be evaluated.

Similarly, despite a number of references to rural issues and rural programmes the New Regeneration Framework described in Chapter 6 shows little evidence of an appreciation of the regeneration needs of rural areas. There can be little confidence that the Programme for Government commitment to rural proof Welsh Government strategy and policy at the formative stage has been followed through here either in this consultation document or in the policy review that preceded it.

Question 1: What is your feedback on lessons learnt from delivery to date?

- Greater certainty is needed for future years; regeneration is a multi year task.
- Strict adherence to FY expenditure planning and the lack of flexibility is unhelpful and reduces the real regeneration outcomes of the programme as well as the opportunities for adding value to delivery through joining up activities from a range of funding sources.
- There is a lack of an all-Wales view; measuring progress not just locally but across the whole of Wales to evidence real outcomes nationally rather than local outcomes with the probability of poor or little

achievement overall and the possibility therefore of criticism of the current programme as being deadweight.

- Local approaches should reflect a strategic approach both nationally and regionally.
- The current arrangements for local boards have worked and have been easy to operate as they do not need to address priorities or competition between areas as is implicit in a regional or national approach.
- Current arrangements highlight the continuing need for much greater 'buy-in' and focus from the wider public sector and in particular a grasp of the wider regeneration impact of projects not "customarily" accepted as having substantial regeneration outcomes, for example, health services, or of the positive and negative regeneration outcomes of operational strategies. There are particularly exciting and innovative opportunities to harness much wider impacts and achieve more with heritage projects.

Question 2: Should other national outcomes or principles be considered?

- Support the principle of the three high level outcomes focussing on prosperity, learning and a healthier Wales but would observe;
 - A further high level outcome focussing on equalities should be added;
 - A final high level outcome of enduring (sustainable) results should also be added; and,
 - There should be no specific reference to 'communities' at this high Framework level. The apparent intention is to seek a prosperous Wales, a learning Wales, a healthy Wales, an equal Wales and a sustainable Wales by targeting places to achieve these overall outcomes for the whole of Wales as part of the 'Programme for Government'.
- There is a fundamental discontinuity in the development of the outcomes outlined in the draft Framework: The Framework as written gives the appearance of precedence to the outcomes of the Communities First programme over the Programme for Government's objectives. The strategic national outcomes for the Regeneration Framework should be set above those for the Communities First programme. This Framework is intended to apply to the whole of Wales whereas the Communities First programme has now evolved into a programme for only part of Wales and has no relevance to most of Wales. This lack of correspondence raises important questions about the delivery of a regional approach and the proliferations of different regional groupings for different purposes.

Question 3: What more can be done to achieve greater coherence and cross cutting action across departments?

- Adoption of Results Based Accountability™ at all levels including and driven by the Ministerial Advisory Panel, to ensure that coherence and the role of all departments is built in at all stages and transparent and that the approach is not just adopted to account for the performance of individual investments.

- The Ministerial Advisory Panel's terms of reference should clearly include all departments and, as an organising principle, include an expectation of full engagement, endorsement and full active participation. There are many challenges and understandings needed here.
- Develop and share a Communication Strategy for internal WG departments and disseminate to external partners to ensure the delivery of a whole government approach.

Question 4: Do you agree with the national, regional and local approach set out?

- In general yes, there is a clear need for a strong national policy to oversee the approach and manage competition between areas in line with achieving real all-Wales growth. This national all-Wales overview is absent presently.
- Additionally there are key all Wales actions which only departments of Welsh Government can initiate. These might include business rate relief, planning policy and strategic planning of health services and investments. But there must be transparent checks and balances to ensure that local priorities are not lost when national priorities are decided.
- Similar and parallel comments and safeguards are needed to ensure that the benefits of regional collaboration are achieved and that there is transparency to ensure that local priorities are not lost when regional priorities are agreed
- Clarity and a consensus is needed on the use and meaning of 'regional' and 'local' across all departments of Government. Different regions are already coming to be used by Welsh Government in the delivery of different aspects of the Programme for Government. This is confusing and potentially duplicative of effort on the part of all stakeholders. Additionally some stakeholders equate local with local authority area and see a need to replicate delivery at a 'community' level to give effect to the high level outcomes as drafted using 'communities' as part of each outcome.
- The south west and mid-Wales region is a vast area of Wales with marked contrasts in the issues facing both the urban and rural parts of the region. The Group is pleased to note that the Framework reflects the need for an all service approach to regeneration by local authorities. The impact of investment in care, schools and transport etc., all contribute to renewing our towns and communities. The areas of Welsh Government activity outlined in the previous section at 6.1.iv and v are equally areas of local authority activity or delivery. These thematic areas could have been used as examples for focussing interventions outlined on pages 31 and 32 of the document. This would evidence the much broader reach of regeneration and a commitment to a whole government approach as well as acknowledging the range of issues facing urban and rural areas. The seven illustrations chosen on pages 31 and 32 are limited, focussing on the renewal of towns and failing to demonstrate a cross-departmental or whole government approach.

- Regeneration takes place at regional and local levels through collaborative working arrangements both between and within local authorities. The driver for economic development and regeneration is founded primarily directly or indirectly in the work of local government because of the wide range of functions and responsibilities. Crucially the central role of local government brings the significant advantage of democratic accountability. Where would such accountability and responsibility be built into the proposed regional level?
- There is no indication of which organisation would take the lead in establishing and setting up the regional boards. How would membership criteria be established (and balanced between the three regions of Wales)? How would the work of the boards be scrutinised? What would be and how would the governance arrangements and supporting secretarial services be established? In the SW and mid region how would 3 universities, 5 FE colleges and 3 health boards be engaged and involved?
- Although not stated explicitly, there is an understanding that other sub-regional and or local boards could be set up as part of the overall Framework. Annex 4 gives a diagram of the three levels for the New Regeneration Framework; however, page 31 refers to Annex 4 as “the proposed governance framework”. There is insufficient information and guidance provided in Annex 4 on governance arrangements, accountabilities and responsibilities.
- At each level, there should be clear and transparent accountability not just in arriving at decisions, recommendations and priorities but also in the selection and appointment processes for the groups undertaking these tasks.

Question 5: Do you have any comments on our proposals for how we will target and direct our funding?

- The Framework proposes indicative funding allocations to be made to the three regions on a formula basis but that actual funding will be based upon business plans to be assessed by Welsh Government.
- The proposed consolidation of targeted investment into specified investment streams may be challenging for the achievement of regeneration outcomes. The identified streams may not be the most appropriate for local regeneration issues or indeed the business case for the investment.
- While some revenue funding is suggested to help produce the business case and evidence, there is a substantial cost in gathering all the evidence suggested in the document. It would be more cost effective to make use of existing regional and county level regeneration strategies and avoid duplication.
- The commitment not to select places may be welcomed but the proposal “to set robust criteria for proposals and to facilitate their development through our regional teams” needs more explanation particularly the relationship with the ‘local’ level, the detail of exactly what is proposed and how Welsh Government will establish cross-departmental teams for the three regional areas to be able to deliver this.

- Results Based Accountability™ is not clearly embedded in the selection and criteria for the evaluation of proposals. This will seriously undermine the benefit of the commitment to its use.
- Achievement of local outcomes / local contribution is not included among the evaluation criteria.
- There is a strong emphasis on using regeneration funding to draw down European funding at a regional level; but not all priorities will be eligible for European funding and large numbers of communities in each of all three regions are in 'east Wales' and therefore potentially eligible for less European funding as 'more developed regions'.
- The envisaged model for European funding seems to indicate the use of the innovative Integrated Territorial Investment approach outlined by the European Commission in its proposals for the post 2013 period. While it is encouraging to see this as an ambition, there are no formal arrangements yet in place and no obvious responsible entities at these regional levels. The statement that this will achieve 'more effective alignment of match funding opportunities' is not explained or evidenced.
- The evaluation criteria introduce bias; proximity to Communities First clusters is suggested. The Communities First programme has now been targeted away from the substantial sub regions in Wales. WIMD to which CF is closely linked, is widely recognised as not adequately describing poverty and deprivation in rural areas because of low population levels and the insensitivity of Census output areas. These areas contain some of the most deprived communities and towns in Wales. The rural proofing commitment in 'Programme for Government' has yet to impact on these issues.
- A key criterion should be the clear intention that interventions and investment must become self-sustaining and generate sufficient revenue either directly or by savings that will finance their maintenance and renewal in the future; that is they are a one-off operation (the one-time, last-time principle).
- Page 34 refers to the opportunity to pilot these approaches in financial year 2013 – 2014, but in the absence of a regional infrastructure, how will these pilots be competed for equitably across all parts of Wales? When will Welsh Government 'set robust criteria' for this piloting? How will the pilot ensure that the approaches are on an all Wales basis and will they demonstrate 'rural proofing'?
- Greater regard is needed for the role of the private sector in evaluating proposals; without certainty about their engagement and involvement, proposals will fail to fulfil the one-off operation (the "one time, last time" principle) aspiration and run grave risks of substantial distortions of market conditions across Wales for many town centre and other activities.

Question 6: We want to ensure effective monitoring and evaluation of regeneration activities, will the approach set out achieve this?

- The effective monitoring and evaluation of these activities will require a more fundamental approach. Already noted above is the need for clarity about the monitoring of activities at each level, local regional and

national. There are no arrangements for monitoring or scrutiny, for example, of regional level activity. There is need for the transparency of all activities at all levels and for openness to public debate and media.

- The Results Based Accountability™ model is highly appropriate to being deployed to demonstrate accountability at all stages of the process outlined and at local, regional and national levels. It is perhaps not best deployed simply as a project performance management tool as is described on page 34.
- Effective monitoring and information on a comprehensive basis covering Wales as a whole, each of the three regions and locally would be helpful to demonstrate not just achievements but also compliance with State aid requirements.
- The approach set out, although referencing Results Based Accountability™ does not clearly set out the approach to be adopted. A number of initiatives and approaches are mentioned but there is no clear indication of how these could be used and integrated with RBA. Without such an indication there can be little confidence that how this will work or if it will be effective.

113. Play Wales

Play Wales is the national charity for children's play – promoting quality in all environments where children might play and advocating for playing children across disciplines and services. We work to close the gap between children and young people's needs and wishes and the provision that is made for them to play. We work to raise awareness of children and young people's need and right to play and to promote good practice at every level of decision-making and in every place where children might play.

Play Wales welcomes the opportunity to respond to this consultation.

We recommend that there is a stronger emphasis on children's access to play opportunities within their own communities.

The value of outdoor space for children's play has been recognised in other countries. For example, in Rotterdam urban design is underpinned by a set of planning guidelines which are based on the principle that all public space is a potential play area and that all new and renovated developments should allow a clearly defined amount of safe, easily accessible, attractive space for children to play.

The text below is taken from an abstract presented at a 'Child in the City' conference in Rotterdam in 2008. The accompanying power point presentation can be found here:

<http://www.playsafety.ie/Docs/Rosemarie%20Maas.pdf>

(Accessed January 2013)

In 2003, the city council and sub municipalities agreed on the necessity of a set of norms for outdoor play areas that was specific to Rotterdam, based on a recognition:

- Space for outdoor play is easily sidelined to other interests.
- There were no clear guidelines of when a residential areas has enough outdoor play areas.

- Outdoor play areas are quite often planned in places that are not easily accessible to children and there is often not enough space closer to home.
- The need to combat a lack of exercise In 2004, a set of norms was drafted based on theoretical studies and investigations on the subjects of
 - The development of children, their sport and play behaviour and their need for outdoor areas
 - Children's traffic skills
 - Surveys of existing norms for outdoor play areas.
 - Inclusion of a set of norms for outdoor play areas in urban planning processes, both in policy and in urban planning procedures.

These proposed norms were tested in 2005 and 2006 in several different living environments, particularly in neighbourhoods where land use was under discussion.

This showed that:

- The proposed norms are compatible with current urban planning, if implemented in time.
- The norms are realistic. Most investigated areas conformed to the norms already. This is surprising, as these new norms for Rotterdam are stricter than the guidelines most often handled in the Netherlands.
- The norms could be used as a tool to measure whether or not restructuring plans reserve enough outdoor play areas. It could also be used as a policy instrument to evaluate whether or not enough outdoor play areas have been made allowance for in existing neighbourhoods. Possible compensation measures have been outlined and are currently being tested. The Rotterdam Norms for outdoor play areas consist of 3 key elements:

1. One central recreational area of at least 5000 m² within each large barrier block¹ (bigger than 15ha). In smaller barrier blocks (less than 15ha) one big recreational area of at least 1000m² is enough. These areas should contain the following urban planning features:

- Centrally situated
- Visible from housing
- In unpolluted places
- Parking ban on the recreational side of the road
- Access to sunshine and shade

2. Larger recreational areas (of at least 1000m²) should be at least every 300 metres from the central recreational area; in densely built areas² every 200 metres. There should be areas appropriate for outdoor play at least every 300 metres or 200 metres (respectively).

3. Wider pavements (3-5 metres wide) suitable for play on at least one side of the street, preferably the sunny side. The norms came about as a result of consultation between various municipal services, including urban planning and housing services, public works, municipal health services, department of youth education and society, development agency and sport and recreation. It is our understanding that the interpretation of the Rotterdam norms has resulted in all public open space being designated as children's play space (unless good reason can be found otherwise). Section 11 of the Children and Families (Wales) Measure 2010 places a duty on local authorities to assess and secure sufficient play opportunities for children in their area. The Play Sufficiency Duty comes as part of the Welsh Governments anti-poverty

agenda which recognises that children can have a poverty of experience, opportunity and aspiration, and that this kind of poverty can affect children from all social, cultural and economic backgrounds across Wales.

The Order, which requires all Local Authorities to assess the sufficiency of play opportunities for children within its area, commenced on 1 November 2012.

1 'Barrier blocks' are areas within barriers consisting of roads with a speed limit of 50km/h or higher, water (river, canal, pool, lake, ponds), rail infrastructure (tram and railway lines) and/or business and industrial areas.
2 Densely-built areas are those that have 75 houses/ha or more.

Each Local Authority is required to conduct Play Sufficiency Assessments and complete an Action Plan in line with Statutory Guidance. The Statutory Guidance is broad and recognises that the provision of quality play opportunities can also significantly contribute to agenda for the whole community including:

- Community safety – by providing safe environments for children and all other citizens.
- Sustainable development – by providing environments that attract families to work and live in areas that meet the needs of the whole family over a period of time. 3
- Although local authorities and their partners are still undertaking the Play Sufficiency Assessments, early indications suggest that there has been a positive response by most local authority planning officers in terms of the impact that their decisions have on children's access to play and in ways that the planning policy can be improved to allow better access to local play opportunities.

Research by the Joseph Rowntree Foundation 4 found that a focus on play and public space was a key factor in making new and regenerated communities attractive to families. The Commission for Architecture in the Built Environment (CABE), 5 drew similar conclusions from its research into the views of residents of new housing.

Play Wales would be pleased to be contacted by Welsh Government regarding the information provided. We advise that responding to this information will better support local planning authorities to develop and implement planning policy that ensures children and young people have access to high quality playable spaces close to where they live and spend their time. This approach will also be useful to local authorities, in terms of improving the delivery of better places to play, when the duty to secure play sufficiency is commenced in the future.

Kind regards
Marianne Mannello
Assistant Director

114. Newport City Homes

We welcome the new regeneration framework and the vision that “everybody in Wales should live in a vibrant, viable and sustainable community with a strong local economy.”

The consultation document sets out a comprehensive overview of the regeneration landscape with adequate coverage of all relevant aspects. We strongly support the key principles of partnership, strategy and sustainability that underpin the new framework and a people and places approach. In the current economic context, and specifically that of capital famine, it is critically important to maximise the effective use of scarce resources by way of creative partnership working and all sector collaboration.

However, as there should be an understandable drive for delivery we are concerned that the new framework will potentially lead to duplication and confusion frustrating the genuine desire to improve social, economic and environmental outcomes for communities in Wales.

Turning to the questions posed in the consultation document we would respond as follows:

1 What is your feedback on lessons learnt from delivery to date?

We would concur with much of the analysis of the challenges that all sectors face in delivering our shared vision for regeneration and fully support the need for change. It is clear to date that those examples of innovation in regeneration have been housing-led with the RSL sector leading the way in demonstrating the win:win that such investment delivers. That is, such housing-led regeneration delivers on so many aspects of the holistic approach to regeneration set out in the document. What we know is that, to date, the regeneration landscape consists of a confusing array of strategies, initiatives, funding streams and criteria. What is required is a simple and seamless approach that harnesses the best from national and local players.

The local experience of regeneration and the role of Newport Unlimited is a positive one. The governance arrangements for Newport Unlimited, as an urban regeneration company, is strongly based on partnership working and ensures there is a real focus on outcomes. Whilst we are aware that beyond 2014/15 there will not be funding available to sustain Newport Unlimited, we would strongly advocate that the lessons learnt from its work are adopted by whatever revised governance structures are put in place within the city/region context.

2 Should other national outcomes or principles to be considered?

We would broadly support the national outcomes relating to prosperous, learning and healthier communities. Whilst we would have advocated an approach which focussed on the four priority themes of jobs and skills, economic opportunity, healthy well-being and safe and vibrant places we note that there is reasonable coverage of these in the new framework and

the definition of regeneration set out as being:

“...an integrated set of activities that seek to reverse economic, social and physical decline to achieve lasting improvement, in areas where market forces will not do this alone without some support from government.”

There needs to be some caution in relation to new governance structures frustrating, or undermining, innovation and flexibility based on locally determined priorities rather than those ‘imposed’ by reference to regional working or national outcomes.

3 What more can be done to advance greater coherence and cross cutting action across departments?

We welcome the commitment to achieving a whole government approach with the housing, regeneration and heritage portfolio acting as “a catalyst for joined up planning and delivery across a range of government departments”. However, if all our efforts are to have a clear focus on delivery there will need to be a significant shift in the level of integration and joined up working than has hitherto been the case. A holistic approach to the Welsh Government’s overall budget and how it delivers jobs and economic growth within a framework for regeneration that ‘bites’ in disadvantaged communities, is what is required. We remain unconvinced that a new framework will, in isolation, deliver such an outcome. The array of strategic frameworks, funding streams and policy priorities that often overlap will frustrate such an honourable objective. The document itself, by a ‘romp’ through the current set of national programmes, in addition to the increasing requirement (in the absence of any fundamental reorganisation), for regional collaboration and local leadership in delivering a single integrated plan, demonstrates the difficulty of delivering simplicity and seamless joint working.

There are a plethora of initiatives such as the Infrastructure Investment Plan, Enterprise Zones, City Regions, EU funding programmes (existing and new), Together for Health, Communities First and many more. All, to a greater or lesser extent, aim to regenerate communities in Wales. There needs to be some rationalisation, greater evidence of joined-up ministerial working and specific outcome requirements for senior civil servants to demonstrate such an approach to inform regionally based collaboration. We welcome the implied focus by Welsh Government officials on regional collaboration consistent with the Simpson review and the need to take into account forthcoming Bills on housing, planning and sustainable development.

4. Do you agree with the national, regional and local approach set out?

Whilst we can appreciate the rationale behind the three tier approach we have concerns about duplication and frustrating locally determined solutions. Both in the context of this and the previous question, the potentially powerful role the Spatial Plan for Wales could play should not be overlooked. We noted earlier that the national outcomes were sufficiently broad to nurture and encourage a wide array of responses based on locally determined priorities informed by a unified needs index, single integrated plan and cluster based Community First programmes. Our concern is that there is a lack of clarity about how prescriptive the regional board's role will be in the determination of business planning and in turn targeted investment allocations. In our view such regional boards should be about facilitating and enabling not control. Moreover, the proposed Ministerial Advisory Group should be entirely focused on evidencing joined-up government working to support the clear intent for a holistic or 'all service' drive on regeneration outcomes. This would result in the strong bottom up approach envisaged that is not 'stifled' by over complex and burdensome governance arrangements.

5. Do you have any comments on our proposals for how we will target and direct our funding?

In support of a whole government approach and joined up working we would advocate that the entire budget of Welsh Government is evaluated to establish regeneration 'bite' and how by sensible procurement and alignment, positive regeneration outcomes can be secured. This will ensure that intention that the new "regeneration delivery model must be able to evidence that investment has made the greatest impact" is delivered. As indicated previously we welcome the people and places based approach supported by evidence driven business plans. In housing- led regeneration with the local authority and housing association sector working in partnership with Welsh Government there is ample evidence and demonstration projects of such an integrated approach supported by investment and smart procurement. There needs to be an integration of the array of funding streams to support the new regeneration framework and related delivery model. There are elements of this in the targeted funding and investment stream proposals set out but a streamlined and even more joined-up and inclusive approach would have merit and ensure "integrated holistic projects" achieve the potential envisaged.

6. We want to ensure monitoring and evaluation of regeneration activities, will the approach set out achieve this?

We have no specific comments to make on the merits, or otherwise, of a Results Based Accountability (RBA) approach. Whatever monitoring and evaluation mechanisms are put in place should be simple (to avoid paralysis by analysis), derive from locally agreed measurement (via Unified Needs Assessment/Single Integrated Plan/LSB and “Shared Purpose : Shared Delivery”) and only evidence those regeneration outcomes that make a real difference in communities where well-being is most absent.

In overall terms we welcome the new framework and associated delivery models with some reservations that seek to ensure we all focus on delivering positive regeneration outcomes.

Peter Cahill Chief Executive

14th January 2013

115. Canal and River Trust in Wales

VIBRANT & VIABLE PLACES CONSULTATION RESPONSE

1. Glandŵr Cymru – The Canal & River Trust in Wales - welcomes the opportunity to respond to the Welsh Government’s consultation on the New Regeneration Framework. The Canal & River Trust was formed in July 2012, taking over the responsibility as the guardian of the waterways, the waterways museums and archives in England and Wales from British Waterways and The Waterways Trust.
2. For the first time this places the management and development of this part of Wales’ working industrial heritage in Wales.
3. Glandŵr Cymru wishes to play its part in the Welsh Government’s ambition to reverse economic, social and physical decline. Its predecessor body, British Waterways, was instrumental in using its industrial and maritime heritage infrastructure as an engine of regeneration; transforming communities and driving inward investment and job creation in urban and rural areas in the face of market failure. Post project evaluation demonstrated time and time again that forecast economic, social and environmental outputs and outcomes were exceeded.
4. While our industrial and maritime heritage helped define Wales it is now too often seen as a reminder of what has been lost rather than as a celebration of a people who are innovative, bold and ingenious. It is ironic that the overseas visitor sometimes has a better appreciation of our landscape and heritage than we do ourselves. It is part of who we are and what creates the character and distinctiveness of Wales. That rootedness in the culture creates the sense of place and belonging that together make a community. With the creation of the two City Regions and our World Heritage Sites we have the opportunity to once again use these assets to drive growth and job creation.
5. As the document sets out physical regeneration cannot be separated from health and well-being, skills and education or other quality of life factors. Nor is it necessarily separate from tourism or the visitor economy which can support facilities that are just as vital in sustaining vibrant and viable places for local people.

6. Glandŵr Cymru already works with a range of partners across Wales, including the members of the Heritage Environment Group and CREW, to promote the ways in which our industrial and maritime heritage and our waterfronts can be used to the advantage of the people of Wales. Examples of our track record are included in the detail below. We look forward to an ever closer working relationship across national and local Government and with the Ministerial Advisory Group and colleagues in the private and third sector to help deliver the Government's ambition as described in this document and companion strategies.

What is your feedback on lessons learnt from delivery to date?

Context

7. The challenging economic context inevitably means that funds need to be concentrated where they can deliver the greatest benefit or ameliorate the greatest need i.e. responding to both opportunity and need. In some areas these will be coincident. In the two proposed City Regions the historic canal corridors, because of their industrial past, include some of the more deprived communities but also brownfield sites and areas of opportunity.
8. This was just as true of the canals in the Scottish Central Belt before they were regenerated at the turn of this century through a multi-agency funding package including ERDF. Within 6 years the package had delivered over 5,000 jobs and £324m of private sector investment (over three times the original investment), improving indices of multiple deprivation and introducing the first ever private sector housing in some areas. At a social level community confidence was raised and £6.5m of health benefits were quickly being delivered year on year.
9. In rural areas a small number of jobs may be disproportionately important adding resilience to the economy and supporting local businesses, services or facilities upon which rural communities depend. The Welsh Coastal Path is an excellent example of the way in which a simple idea, creating new infrastructure (by linking existing fragments) with modest funding from a variety of sources, has created local rural jobs, raised the profile of Wales internationally and provided the springboard for new businesses. Small ideas can be disproportionately effective.
10. Our waterway towpaths have a greater ability to be accessible to all, providing traffic free routes, but equally can create links between other trails and paths, between communities and between attractions. They are a lifeline for small rural businesses (providing up to 60% of turnover for some pubs) and a facility others can use and exploit. Waterways also provide wildlife corridors and linear traffic free routes for wildlife connecting remnant habitats.
11. Within the Rural Development Programme we have found a lack of coordination and cooperation between local authorities applying for funds resulting in synergy between adjacent programmes being accidental rather than deliberate.

Regeneration Areas

What more can be done to achieve greater coherence and cross cutting action across departments?

17. Within the key programmes, cross government working will be required to ensure each pound delivers the optimum outcomes in terms of physical regeneration, skills development, community well-being, etc. A robust determination, backed by evidence, will be needed if the Government is to take the necessary long term view to create transformation rather than be pushed towards short term gains which might be achieved in a single session or through a single disconnected project investment. Quality of design to ensure walkable neighbourhoods, a sense of place and maintenance of the character and distinctiveness that makes Wales special, procurement processes which support the development of skills and businesses; a commitment to lower energy use; etc. all have the potential to appear to cost more in the short term. New assessment models may be necessary to reflect the whole life costs of these practices based on robust evidence backed by monitoring and evaluation.

Principles of Regeneration

18. The key principles are supported in particular the need for cross government working and partnerships between public, private and third sectors to ensure different funding streams are complementary and neither compete nor duplicate. We are also pleased that it also recognises that regeneration requires a balance between economic, environmental and social needs that can be seen to be competing.
19. The recognition of the longer timescales required for transformation is welcomed as is the underpinning by evidence as the lead rationale for regeneration. Imagination is important where market failure has occurred but replication of best practice and lessons learned from elsewhere are more important than the drive “to be innovative” for its own sake too often seen in third party funding programmes.
20. Everywhere has a history, which shapes its character and helps to give a sense of place. Historic character is an asset in sustainable regeneration that seeks to enhance local distinctiveness. Our heritage has social value, fostering an attachment to place that comes from shared stories and memories, and is reinforced by social interaction in shared places or activities. There is also considerable economic value in our heritage, which makes a significant direct contribution to the Welsh economy as a source of income and employment, and which can add value in regeneration activity. The way in which we care for the historic character can strengthen a sense of place and contribute to social and economic well-being.
21. Our waterways have a historic character of their own, a distinctive architectural and engineering heritage and a strong connection to our industrial past. Waterways fit into the story of whole places, the way they worked and were shaped, developed and connected. The heritage value of our waterways is a significant ingredient in their economic and social worth which can be an asset to the places to which they belong.

22. Our coast, our ports, our inland waterways and our industrial heritage are inseparable and together form a rich maritime heritage. The Wales Coastal Path (as noted in paragraph 9) has amply demonstrated how a simple idea can capture the imagination but also transform the way people think about their place. It also shows how, by thinking about our resources in a different way, we can use them to promote what makes Wales great, encourage visitors and build local pride, create jobs and prosperity in the unlikeliest of places while improving the quality of life of all who use them or live by them.
23. This is no less true of our inland waterways, docks and harbours and people across the world are bringing their industrial heritage back to life to meet the needs of the present day but with an eye to the future. These people are discovering for themselves that where land and water meet transformation of people, place and prosperity can take place.
24. Consideration also needs to be given to the character and distinctiveness that creates the sense of place and rootedness that communities need. Quality of design, access to open space and liveability are essential elements if places are to work for the people who live there, work there or relax there. Perhaps most importantly it is people's reaction to a place that determines whether they will invest. All it takes is vision.
25. Glandŵr Cymru is currently compiling a Waterfront Design Guide in collaboration with Cadw and CREW. This publication will draw on examples from around the world, in a variety of locations but with relevance to Wales, to develop common threads which together will lead to sustainable waterfronts.

Joined up delivery

26. Glandŵr Cymru's predecessor body British Waterways developed considerable expertise as a regeneration deliverer forming a bridge between the public and private sectors. We will continue to do this, working alone and with our joint venture partners, now that we are in the third sector taking advantage of the opportunities that status brings.
27. We have used our property portfolio for the generation of economic return that both contributes to the on-going maintenance of the waterways and better secures their long term financial sustainability; in effect an endowment fund for the waterway network. In addition, the property portfolio is used to facilitate and promote regeneration or development of the waterway corridor in a holistic manner that optimises the capacity of both the waterway and its neighbourhood to deliver community well-being and wider public benefit. The pursuit of the second purpose is not entirely altruistic as the health and performance of a waterway is directly linked to the quality of the environment through which it passes. We therefore have a direct (and permanent) interest in the quality of any waterway neighbourhood. That self-interest is nearly always directly aligned to any needs or objectives of wider area regeneration beyond the waterway neighbourhood corridor. Indeed our ability to initiate and facilitate such wider regeneration is a key factor enabling local public partnerships

and further adds value to the activity. Furthermore the activity has been undertaken in major and minor settlements, rural, industrial and post-industrial.

28. Our experience is in identifying opportunities and building bridges between the public and private sectors and bringing partners together. Our latest development is in Birmingham City where more than 1,000 homes will now be built on the Icknield Port Loop, near Edgbaston reservoir. Plans also include a ten storey hotel, a shop, conversion of a former stables block to a community building and a new canalside park on a 22.5 hectare site, dominated by vacant industrial premises, and jointly owned by the Homes and Communities Agency, the Canal & River Trust and the city council. The site forms a major part of Birmingham's housing growth ambitions, creating a new urban community on the western edge of the city core.
29. Another example is the recently completed Liverpool Link which was created to connect the waterways system to the Docks to ensure the water space was lively and active and acted as a positive contribution to landward development. Similarly the waterways of East London have turned from being a barrier, edge or backdrop to the core of a water city during the Olympics and its legacy.
30. It helps that waterside residential land attracts a premium (on average of 18%) and can often tolerate higher densities. The waterways themselves then establish easily accessible routes and connections between the City centres and their rural hinterland.
31. This best practice advice and case study information could be made available to the Welsh Government to ensure the opportunities for growth arising from the unrestored waterways in the two City Regions and North East Wales (and potentially the Montgomery in mid Wales) are fully exploited.
32. For example the Monmouthshire & Brecon Canal has the potential to be extended into Cwmbran, to create a new arts quarter and additional commercial space and housing and then onto Crindau Basin (in Newport) where access can be restored to the River Usk and the coast to create another link in our chain of coastal marinas. Similarly the Neath & Tennant Canals could be restored into the Prince of Wales Dock SA1 to reanimate the water space and act as a focus and catalyst for redevelopment of adjacent brownfield land along its route and around the Dock.
33. The Montgomery and Llangollen Canals are both trans-national waterways with strong cross border economic links. As a World Heritage Site the latter waterway could and should become a world class visitor destination as the catalyst for regeneration of the redundant (and contaminated) brownfield sites once occupied by foundries and chemical works.

Other Government Areas

34. Just as waterways are multifunctional and deliver outcomes from tourism to health and well-being and from land drainage to mitigation of climate change so too are the impacts of regeneration. We agree

strongly with the analysis of the themes in the document and would also comment as follows:

Heritage

35. The recognition that heritage is a vital part of regeneration is welcomed. It is the character and distinctiveness of our built and natural heritage and the landscapes shaped by people over millennia that makes Wales what it is today. Character and distinctiveness is also provided by non listed buildings and structures and the patina (e.g. rope burns on canal bridges) that link the present to the past. This theme is expanded from paragraph 53 onwards.
36. Our newest World Heritage Site, the Pontcysyllte Aqueduct and Canal, has a higher profile overseas than here and, as pointed out in the document, has the potential to offer a world class visitor experience but also to act as the catalyst for regeneration of brownfield sites and the communities of Plas Madoc, Cefn Mawr and Acrefair. These transformational projects are typical of those that, while delivering some quick wins, take 10 to 20 years to embed fully.

Education and skills

37. During that period however the regeneration projects can be used to develop skills in the communities from stimulating an interest in STEM subjects in local school children (Glandŵr Cymru has an established educational programme working with local schools and local teacher volunteers) to the employment and training of local people in the works themselves. In itself this can help address the chronic shortage of traditional building and rural skills, which is putting our housing and building stock at risk, and add them to those that are currently in the mainstream. This potential is recognised in the document under “Community Benefits in Procurement” and is supported.

Transport

38. 96% of the use of our navigable waterways is on the towpaths and not on the water. In the City Regions and throughout Wales the legacy infrastructure of our industrial heritage, in the form of its railways, tramways and canal towpaths, now offers reasonably flat and level routes for sustainable transport in the form of walking and cycling for recreation, tourism or commuting. Their traffic free nature also makes them ideal for those just beginning their journey from car or bus to walking and cycling.

Environment and Health

39. Physical activity plays a key role in the control of the body’s response to physical stress. Chronic stress reduces levels of physical activity and inactivity reduces engagement with other people and places. To get the place right for activity we need to foster distinctive, attractive communities with a strong sense of place. We also know that green space moderates the effect of stressful events in children and reduces health inequalities.

40. We therefore need to use accessible blue / green space to encourage physical activity to experience the natural environment, increase and enhance social connections and generate independent physiological and psychological responses to perceiving natural environment which reduces chronic stress.
41. In some areas, and even some where the wider outdoors is on the doorstep, the canals offer the most easily accessible and unthreatening open space which people can use. Users don't need permission, a map or specialist equipment and the routes are flat and level. They are part of the "natural health service" or "green gym" open to all, every day, for free. Canals and waterfronts provide an everyday escape.
42. What is more it has been shown that both natural and built scenes which also contain water are associated with higher preferences, greater positive affect and higher perceived restorativeness than those without water. ⁱⁱ

Community Benefits in Procurement

43. The document recognises that transformation can take a generation, or at least a couple of decades, and that is particularly true where social transformation is needed. Community Procurement recognises that the process itself can be as important as the physical outcomes and is therefore supported.
44. Glandŵr Cymru ensures it works with local contractors, social enterprises, the unemployed and local suppliers to ensure local communities feel ownership and therefore responsibility for their local canal. We recognise that it is only through waterways being relevant to local communities that their future can be assured.

Do you agree with the national, regional and local approach set out?

45. We broadly agree with the approach but believe there should be scope for flexibility across the boundaries.
46. In the North East it should be recognised that there are strong economic, transport and tourism links across the border and the catchment works both ways. Tourism and recreation in the outdoors has a strong inward flow.
47. Similarly there needs to be flexibility across boundaries in the South East and Mid Wales. There are strong links between Powys and Monmouthshire where the Monmouthshire & Brecon Canal flows from Brecon south into the South East City Region. Indeed the canal is a rare piece of cross authority infrastructure. Powys also has links north, through the Montgomery Canal, with North Shropshire. North Shropshire has identified a triangle of opportunity linking Ellesmere, Chirk and Llanymynech. In the case of Powys and North Shropshire the areas are nevertheless as described; rural with increasing interest in diversification.
48. Glandŵr Cymru and its predecessor body has a track record of evaluating its larger projects for their economic, social and environmental outcomes. In the next year we will be developing our own monitoring, evaluation and research activities so that we can demonstrate the outputs and outcomes of investment in the waterways

and the impact it has on adjacent communities. We would welcome working with the Welsh Government in this area to establish a robust base line and outcome measures.

49. The recognition of the importance of evidence and research and its embedding in policy is strongly supported and could be a distinctive element of Welsh delivery. Qualitative research (outcomes) is equally important to demonstrate the transformation of people's lives implied by the vision (not just the conditions in which people live and work which is an output). Our ability and desire to build on the best in the World (not just the UK) would create the opportunity for Wales to establish a world class lead. The only limit would be our imagination and, of course funding.

Do you have any comments on our proposals for how we will target and direct our funding?

50. The combination of people and place based regeneration is strongly supported.

People based

51. We agree that poverty in participation in a community's culture (including the natural and built environment), sport and education (formal and informal) has a deadening effect on aspiration, health and well-being. Targeted recruitment and training, schools activities, health walks, etc. linked to any investment can help to address these issues.

Place based

52. We strongly agree that historic character lies at the heart of distinctiveness and sense of place but also at the heart of a sense of pride. Our own experience has shown it to be a powerful driver for renewed community confidence but also inward investment. The Scottish example quoted above is but one example.
53. The relatively recent inception of the Pontcysyllte Aqueduct and Canal World Heritage Site and the focus on Copperopolis on the River Tawe is heightening the profile of our waterfronts and industrial heritage. However, the capacity of the waterfronts to act as a catalyst for regeneration, inward investment and growth is still under recognised in comparison with our other three nations.
54. We have seen the transformation of moribund waterways into engines of inward investment and community growth. Waterways with their own rare ecology and scheduled heritage were seen by local people as depositories for tyres, trollies and all manner of litter. Within a few years they became places to walk, run and play; a place for investment and pleasure and, in the case of the Falkirk Wheel, a potent symbol of ingenuity and imagination.
55. Without exception the waterways that have been restored have been restored to create jobs and growth. Development of a visitor economy and conservation of the built and natural heritage has been the added value. The rejuvenated waterways of the Scottish Central belt, described in paragraph 8, have no more boats than we already have on the Montgomery Canal as they are creating a new market. The jobs

and inward investment have been created in developments stimulated by the transformation of the canal and perceptions of the districts through which it passed.

56. As described in paragraph 32 on, there is significant untapped potential to use the lower Monmouthshire & Brecon Canal, Neath & Tennant Canals (and Swansea Canal) and the Llangollen Canal in this way. In all cases revived waterways would create a common thread connecting sites, change long held perceptions and land uses on brown field sites and revitalise communities. The first two cases would re animate the docklands and our working heritage and connect with the sea; the latter would create a world class gateway into North Wales.
57. The Montgomery Canal, being largely rural, has the potential for smaller scale developments which would principally add resilience to the local economy and natural environment. However, even there a private sector investor identified the potential for a £9.5m investment, unfortunately across the border, which would have created 38 direct FTE jobs (147 jobs if one includes indirect and construction jobs).

Investment

58. We recognise that future investment / funding is going to be challenging as public sector austerity measures and the economic down turn seriously limit funding for capital / regeneration projects. Across Wales large scale infrastructure projects will have to be supported by the Wales Infrastructure Investment Plan. While local regeneration initiatives in town centres and seaside towns may have the potential to financially support some projects, the quantum of finance available is likely to be small.
59. The use of the Treasury Green Book criteria is welcomed provided the non market benefits are also evaluated robustly and included as set out in the Annex.
60. The use of European funding in a holistic way across a range of priorities is to be encouraged and guidance may be necessary to ensure partners access or apply for the funds available, including smaller funds such as research and trans-national co-operation.
61. However not all areas with potential are within the Convergence Area. Applications to RDP are competitive at very local level (diminishing their effectiveness) and the lack of targeted match funding can restrict the take up of funding streams and competitiveness of applications (e.g. Life+).
62. The multi functionality of waterways and their ability to contribute to EU2020 and smart, inclusive, sustainable growth is not yet recognised at a European level. Waterways are only acknowledged in the context of freight transport and the Ten-T network. That network excludes all of Wales' waterways and even in a country such as the Netherlands excludes half of their waterways.
63. Glandŵr Cymru is coming to the end of an Interreg IVC project, Waterways Forward, comprising 17 partners across 13 countries. That project identified a number of recommendations with respect to waterways at a European level which would ensure the potential of waterways is recognised across Europe. These recommendations can

be found on <http://www.waterways-forward.eu/news/summaries-results-of-our-work/> and the partners would welcome their promulgation at a UK level.

We want to ensure effective monitoring and evaluation of regeneration activities; will the approach set out achieve this?

64. If the real value is about outcomes, data collected will need to move away from “numbers accessing a service” to “people’s lives transformed”. The former number may be used as a lead indicator but it will not demonstrate the impact that intervention has had on the individual. An in depth survey of a sample of those accessing the service may be sufficient to demonstrate the outcome but the real test will be a shift in indices of multiple deprivation over a longer time period.
65. In the evaluation of the impact of regeneration of the Scottish Canals our predecessor body used a combination of qualitative surveys (improvements in community confidence, people taking more exercise, etc.), collection of statistics (users of the towpath, inward investment in canal side developments) and public data (Indices of Multiple Deprivation) to build up a picture of the impact the work had on a Wealthier and Fairer; Healthier; Safer and Stronger; Smarter; Greener Scotland.

Regards

Andrew Stumpf

Head of National Programmes – Pennaeth Rhaglenni Cenedlaethol

116. Regeneration Skills Collective

Vibrant & Viable Places: A New Regeneration Framework.

A Welsh Government Consultation Document.

Executive Summary

In responding to the questions identified in the consultation document, RSCW considers that Welsh Government needs to:

1. Adopt a firm public sector commitment to a cross departmental and cross portfolio ‘whole government’ approach to integrated and sustainable regeneration.
2. Adopt outputs that are cross departmental, especially in relation to improving prosperity, infrastructure, education / skills, health and greater social inclusion, all within the context of Welsh Government’s unique responsibility for sustainable development.
3. Establish the basis for real, and not token, partnership between the public, private, third and community sectors, with an agreement as to the role and responsibilities of each sector. There needs to be far more encouragement to private, third and local sector involvement with a full commitment to jointly deliver.
4. In the current domestic and global financial circumstances, which are likely

to prevail for many years, establish the basis for innovative, creative and financially resilient solutions for effective, integrated and sustainable regeneration. In the circumstances of more limited public sector finance, seek to maximise the benefits from complementary funding programmes (especially E.U. funds) and new financial models of delivery.

5. Focus investment and intervention to address market failure and reduced poverty (particularly in our most deprived urban and rural communities).
6. Ensure that investment seeks to address both need and opportunity, but in doing so enable the benefits secured from opportunity to support a significant reduction in need, especially at local, community levels.
7. Agree to the introduction of a regional dimension to the delivery of regeneration, complementing action at the national and local levels. Welsh Government should establish an overall vision and strategy; the regional level should create a framework for collaborative action; and the local level should provide the opportunity for effective and timely delivery. The 'top down' and 'bottom up' approaches should work in such a way that provides a genuine two way process. Delivery should be rigorously monitored and evaluated.
8. Take action to secure an increase in the capacity of the wide range of cross professional and cross sector regeneration skills in Wales, thereby creating a more capable workforce and higher value / higher skilled jobs.

Vibrant & Viable Places: A New Regeneration Framework.
A Welsh Government Consultation Document.

Introduction and background

Regeneration Skills Collective Wales (RSCW) welcomes the opportunity to contribute to this policy review regeneration policy by the Welsh Government

RSCW is a network of six professional institutions, representing over 10,000 architects, civil engineers, housing professionals, landscape architects, surveyors and town planners in Wales, committed to the delivery of integrated and sustainable regeneration. It was established formally in March 2004 by means of a Memorandum of Understanding and membership comprises the Chartered Institute of Housing Cymru (CIH Cymru); the Institution of Civil Engineers Wales (ICE Wales); Landscape Institute Wales (LIW); the Royal Institution of Chartered Surveyors Wales (RICS Wales); the Royal Society of Architects in Wales (RSAW); and the Royal Town Planning Institute Cymru (RTPI Cymru). RSCW has also maintained close working relationships with other professional institutions and organisations in Wales over the past eight years, particularly those with an interest in regeneration and in the built environment.

RSCW is managed by a Steering Group comprising employed representatives of the member professions. During 2009, a Regeneration Practitioner's Working Group was also established to encourage greater practitioner involvement in the activities of the Collective; and to provide an effective sounding board to take the Collective forward in the future. The membership

of the Group is drawn from leading regeneration practitioners in the public, private and third sectors.

The activities of RSCW have been delivered at very modest cost through collaborative working and a careful management of income and intermittent sources of grant aid. RSCW's activities over the past eight years includes:

- i. Annual training and professional development programmes that embrace the principles of cross professional working. The programmes have included the first annual national Regeneration Conferences held in Wales; a variety of seminars and workshops; and the introduction of the concept of Site Seminars to Wales.
- ii. Independent research, including the commissioning of the review of professional and cross professional Sustainable Regeneration Skills in Wales by Miller Research (U.K.) Ltd. (March 2008); and the initial scoping of research into Low Carbon Skills in the Professional Services Sector in Wales (2009)
- iii. Support for the establishment of a Centre for Regeneration Excellence in Wales since 2004. Indeed, the Collective provided the Technical Secretariat to the Deputy Minister for Regeneration's Task & Finish Group, whose assessment report for the establishment of a Centre of Excellence in October 2008 was accepted by the Welsh Assembly Government. RSCW has continued to support the activities of CREW since its establishment.
- iv. Welsh representation on the Sustainable Communities Excellence Network UK (SCEN) from April 2009. Since the demise of the majority of Regional Centres of Excellence in England, RSCW has supported CREW in seeking to maintain an exchange of best practice in sustainable regeneration with the English border regions of England, commencing with cross boundary events between South East Wales and South West England in 2011 - 2012.
- v. RSCW has consistently responded to Welsh Government consultations, requests for advice and engagement in Working Parties (e.g. Regeneration Investment Fund Wales), both in the context of policy development and delivery mechanisms.

1. WHAT IS YOUR FEEDBACK ON LESSONS LEARNT FROM DELIVERY TO DATE?

There is a need to put the "lessons learnt from delivery to date" into a slightly wider timeframe context. 'Regeneration', in all of its definitions, has been the subject of public sector investment in a wide range of actions within different parts of Wales for many decades. For many years, policy interventions tended to be reactive with only limited evaluation and no real learning of lessons undertaken in relation to the delivery process. Consequently although some actions were successful (e.g. land reclamation and the greening of the South Wales Valleys) other interventions were often revisited because of the lack of success. In these circumstances long standing problems in certain localities and communities have prevailed. This suggests that there is need for a more visionary, responsive and shared approach to the delivery of regeneration actions, based on more rigorous monitoring and evaluation, with constant feedback to inform any subsequent action.

It could therefore be concluded that problems of economic decline and social exclusion in specific areas of Wales have persisted over this longer timescale because, for example:

- i. Intervention and investment actions have not been properly evaluated and addressed; and / or
- ii. Public investment has not generated sufficient engagement of the private sector to enable the restoration of more favourable market forces; and / or
- iii. There has been insufficient resonance between government and local communities; and / or
- iv. Public policy and investment has not been sufficiently adjusted to changing circumstances.

Whatever the combination of causes, these are issues that must be addressed in bringing forward a new Regeneration Framework for Wales. Whilst some of these issues have been addressed recently, as outlined in Section 3 of the consultation, these actions seem to be mainly aspirational. Positive outcomes need to be confirmed and proper evaluations published or undertaken. But at least it is a move in the right direction.

Because of past problems encountered with the delivery of regeneration policy in Wales, RSCW considers that there must be an even stronger focus on more effective delivery that is properly monitored and evaluated. This was the priority outlined by the First Minister at the commencement of this term of Welsh Government; and the wider regeneration community in Wales could reasonably expect to see evidence of this by the next Assembly Election. RSCW welcomes the commitment of Welsh Government to take forward more innovative practice in delivering a more integrated and sustainable regeneration agenda in Wales in the face of major financial, structural and organisational challenges. However, this will require:

- i. Genuine partnership between sectors and with communities;
- ii. Open and transparent communication between partners.
- iii. A reduction in risk aversion, if really innovative and 'game changing' practice is to be delivered by all sectors.

All of the above will require a change in the culture of working, both at political, administrative, technical and professional levels within all parts of the public, private, third and community sectors.

RSCW supports the improvements being brought forward by Welsh Government in seeking to bring together investment from different departments into specific community and area based projects. However, there still appear to be problems associated with the different criteria and timescale of approvals associated with the different departmental funding streams, which conspires against the maximisation of added value. In particular, early evidence is particularly required as to how:

- i. Regeneration and Communities First teams will work together to facilitate improvements to communities and people living in them. This issue is critical in terms of seeking solutions to the problems of the more deprived communities in Wales.
- ii. Welsh Government intends to "do more to integrate activities across" mainstream regeneration and Rural Development Plan "programmes".
- iii. Enterprise Zones and Local Growth Zones can contribute to the achievement of regeneration outcomes in urban and rural areas, thereby

overcoming some of the major criticisms of the previous application of the EZ approach. In this context, it is essential that designated EZs / LGZs relate to areas of both need and opportunity, as this form of intervention and investment needs to act as a catalyst for wider regeneration actions, if real added value is to be achieved.

The evidence provided in respect of a select number potentially good cross-departmental projects approved in different parts Wales is welcomed by RSCW. The strengths and weaknesses identified in the independent evaluation are also welcomed. However, an evaluation of the specific outcomes of such projects and how they might be improved is essential, especially in relation to existing and future E.U. and other match funding streams.

Finally some comment must be made in respect of skills and training in relation to integrated and sustainable regeneration in Wales. The conclusions of the independent research commissioned by RSCW into professional and cross professional sustainable regeneration skills in Wales published in 2008 still prevail, despite modest and relatively underfunded skills development / CPD events organised by RSCW. These challenges require not just additional training at the cross professional levels, but also in relation to community / social entrepreneurship and finance for regeneration. This is an issue that could be taken forward by the CREW, RSCW and the Higher Education sector in Wales

2. SHOULD OTHER NATIONAL OUTCOMES OR PRINCIPLES BE CONSIDERED?

RSCW accepts the prescribed definition of regeneration in relation to the Regeneration Framework that has been developed. The need to address the particular problems of our most deprived communities will still remain a high priority. However, it is essential that public and private sector intervention and investment both within and external to such communities, can help to reduce deprivation and poverty. A major challenge still exists within Wales to ensure that investment external to deprived communities can be beneficial to such localities, and this issue needs to be fully embraced within national outcomes and principles. It is certainly an issue that is relevant to local and regional delivery.

The specific vision statement is ambitious and will require much higher levels of collaboration between sectors and in securing partnership with beneficiary communities, than has previously existed in Wales; indeed this is a major challenge.

It is vitally important that this approach is not perceived as 'top down' and government led /controlled, as this can conspire against:

- i. Genuine partnership and community trust;
- ii. The adoption of more locally appropriate solutions that can help to realise a national 'vision' and regional objectives.
- iii. Involvement of, and the development of innovative solutions by, the private sector.

Both local communities and the private sector can be generators of the type of innovative practice that can create vibrant and viable places for people.

It is clearly necessary that the new Regeneration Framework is aligned with

Welsh Government's suite of strategic national outcomes. Apart from the three highly important outcomes listed (Prosperous Communities; Learning Communities; and Healthier Communities), it would also be essential to give prominence to those additional outcomes relating to:

- i. The Provision of and Improvement to Infrastructure, as reflected through the emerging Wales Infrastructure Investment Plan; the issues of good public transport, improved accessibility, good health and education facilities are clearly fundamental to the creation and maintenance of prosperous, learning, healthy communities; and
- ii. The unique legal responsibility accepted by Welsh Government to the principle of Sustainable Development. This principle underlies all parts of the Welsh Government policy agenda and should embrace the principle of maintaining of sustainable communities.

There is a need to build more detail onto stated outcomes in the form of carefully considered performance indicators. It is also important to recognise that some regeneration outcomes may only be evidenced over a longer period of time, and this should be taken into account for monitoring purposes. This is particularly relevant in relation to larger capital projects that necessitate lengthier lead-in times.

It is also essential that the relationship between the national, regional and local outcomes should be positive, working in such a way that provides a genuine two way process. In this context, it would be good practice to engage local communities in determining their own outcome measures, within the parameters set nationally and regionally but with the opportunity to focus on the most important outcomes for local people to ensure a 'bottom up' approach

RSCW believe that the Welsh Government's role in setting a new vision and national strategic framework for the delivery of integrated and sustainable development is absolutely critical in engendering enthusiasm among other parts of the Welsh public sector and the private, third and community sectors in Wales. Without positive leadership and an openness to new, innovative methods of delivery, which could kick start a new sense of civic pride and real partnership, regeneration in Wales could fall behind that the rest of the U.K. and not learn from the positive experiences of Europe and the rest of the world. This sets the scene for the proposed 'whole government' approach below; and the progressive national / regional / local structure of delivery set out in a subsequent section of the consultation document.

3. WHAT MORE CAN BE DONE TO ACHIEVE GREATER COHERENCE AND CROSS CUTTING ACTION ACROSS DEPARTMENTS?

Securing sufficient resources to deliver national, regional and local outcomes will be a critical challenge if the new framework is to be implemented successfully in Wales, and this will not be achieved unless there is greater coherence and cross cutting action that access funding across departmental boundaries.

RSCW fully agrees with the key principles of Partnership, Strategy and Sustainability, as stated. However there will be a major challenge in practical implementation of these principles, particularly in the circumstances where priorities will have to be set; where these priorities will require cross portfolio

and cross departmental consensus within Government; and where priorities will need some form of agreement with the private sector, the third sector and specific communities.

The proposed 'whole government' approach is fully supported and will be essential if the key principles are to be fully achieved. In terms of structures and responsibilities within Welsh Government there are issues relating to the responsibilities of both the Minister with current responsibility for Regeneration; and to those Ministers with responsibilities that are relevant to the delivery of integrated, sustainable regeneration. In relation to the latter, the whole Cabinet are all involved to varying degrees in activities relating to the wider regeneration agenda, as evidenced by the list of necessary departmental inputs listed in the consultation document. It is suggested that a mechanism needs to be established where these issues can be co-ordinated and resolved at Cabinet level, possibly through a Cabinet Committee (chaired by the First Minister or Leader of the House). Given the cross portfolio / departmental importance of the regeneration agenda, there may also be a case for establishing a Standing Committee within the National Assembly to review arrangements flowing from the new Regeneration Framework, at least until the end of the current Welsh Government term.

In relation to the current Minister for Regeneration (and Housing and Heritage, with special responsibility for Sport and other matters!), he will need to have a clear focus on his mainstream regeneration responsibilities, with a degree of separation from his other portfolio responsibilities. Clearly his main interest will be to take the new Regeneration Framework forward to approval and implementation. Whilst other parts of his portfolio responsibilities are highly relevant to the regeneration agenda in Wales, these should not override other critical actions relevant to an integrated and sustainable Regeneration Framework for Wales. Infrastructure Investment, the Community First Programme and Economic Development initiatives are three particularly critical areas of related activity.

The adoption of a whole government approach to the issues of an overarching National Strategy and Vision and the establishment of a regional structure for collaborative planning and delivery, are fundamental to the achievement of both the specified National Outcomes and the added value of coordinating public economic, social and environmental intervention and investment.

The principle of Jointed Up Delivery must be characterised by equal Partnership, with the roles and functions performed by different sectors being subject to agreement. In establishing these relationships, the role of the local community sector must also be embraced, in that local delivery will be depend on strong and positive local engagement. Within this arrangement, it is also essential that innovation and creativity, which may involve an element of risk taking, is encouraged.

4. DO YOU AGREE WITH THE NATIONAL, REGIONAL AND LOCAL APPROACH SET OUT?

RSCW fully endorse the proposals for national, regional and local levels of delivery. In taking this form of governance structure forward it is essential that:

- i. Clear and appropriate hierarchical relationships and responsibilities are established at and between each level. Reporting arrangements between

local and regional levels requires greater clarification in order to understand the decision making processes, particularly around prioritisation processes and the resolution of disagreements

- ii. The structure does not become a source of greater bureaucracy and delay; in this context, the structure, especially at the regional level, must facilitate action and delivery and not create delay and procrastination.
- iii. That a principle of 'equality' is secured between the 'top down' and 'bottom up' approach; each must be capable of being influenced by the other.
- iv. There must be an encouragement of innovation, enterprise and 'game changing' action; this will inevitably result in taking properly assessed risks and looking at new ways and mechanisms of delivery.

In terms of the local delivery level, there is a real need to encourage stronger, broader and more positive determination of action. There is plenty of evidence to show that high levels of local autonomy can nurture innovation and pro-activity in relation to 'ownership' of the local environment and 'place'; arts and culture; social enterprise; and social support networks etc. There is a wide range of local structures and mechanisms that can facilitate community based delivery, such as LEADER style groups; Community First networks; Community Interest Companies; and Town / Community Councils. Recent cross border liaison suggests that Parish and Community Councils are far more proactive in England compared with Wales and the facilitation of greater local autonomy in relation to community regeneration could help to redress this balance.

It should also be noted that social housing organisations, particularly those established as a result of housing stock transfer in Wales, are already having an important impact as local regeneration delivery agents beyond their conventional remit of housing providers and managers. In this respect, mixed use schemes such as the Swansea High Street project, have been recently commended.

In terms of a regional level of governance, great care is needed in taking forward this agenda. RSCW is supportive of the need to provide for a level of regional strategic direction and collaboration, which could assist in the establishment of both local delivery mechanisms and in the delivery of National Outcomes. However, RSCW is concerned at the proliferation of potential regional structures that appear to be proposed particularly from different departments of Welsh Government. These include, for example, Regional structures associated with changes in the Welsh planning system in Wales, with possible new statutory powers; the Wales Infrastructure Investment Plan; BETS 'City Regions' for economic development; Community First programme collaborations. These are additional to existing regional structures for health, education and police etc. This situation lacks any real form of spatial coherence and rationalisation is essential if:

- i. A Regional structure is to operate effectively in Wales;
- ii. Bodies and interests from all other sectors will be willing to engage and give adequate time and resource to be involved in such structures. In this context, it is essential that the private and third sectors are fully engaged with this level of governance.
- iii. Any form of regional structure within Wales is to have credibility and impact.

Given the need for this exercise, the detailed nature of any proposed Regional Boards will need further consideration in respect of status, structure and accountability. In terms of the identity of regions within Wales, the three proposed are probably not appropriate.

At national level, there is a clear need to establish a national vision, strategy & investment framework that can interact with integrated and strategic collaboration at the spatial scale of an effective regional structure. In addition, there is need to take leadership of the regeneration agenda in Wales and enthuse partners in the public, private, third and community sectors to enter into a genuine partnership to deliver innovative and integrated regeneration programmes and projects which can transform local communities in the urban and rural areas of Wales.

It would also be useful to outline how regeneration initiatives that cross the national border with neighbouring English authorities and regions can be achieved. RSCW and CREW have already had successful experience in undertaking cross boundary collaboration and this needs to be built upon.

5. DO YOU HAVE ANY COMMENTS ON OUR PROPOSALS FOR HOW WE WILL TARGET AND DIRECT OUR FUNDING?

It is agreed that the future Regeneration Framework must benefit from an even stronger evidence base than has existed before, as funds from the public and private sectors are likely to continue to be relatively scarce for the foreseeable future; and intervention and investment will need to deliver local, regional and national outcomes.

Funding criteria based on a balance between need and opportunity may well be best addressed at the regional level, where strategic investments in infrastructure will need to impact beneficially on areas / communities in need as well as exploit opportunities that address market failure. Inter-relationships between need and opportunity must be clearly identified; examples in the past where this may not have operated adequately include:

- i. Interaction between deprived communities in Cardiff lying peripheral to major investment in Cardiff Bay;
- ii. Similar circumstances relating to investments within SA1 in Swansea; and
- iii. Wider application within defined regions in Wales (e.g. the relationship between Cardiff and Newport and their valley 'hinterlands')

It is agreed that there needs to a focus on both people and places. It is only interaction between the two that can help deliver the suggested vision for the proposed Regeneration Framework of "Everybody in Wales should live in vibrant, viable and sustainable communities with a strong local economy".

There are many ways of ensuring that needs are addressed and opportunities realised through action in relation to people and place.

Key to a sense and ownership of place is the quality of design in its existing and new buildings and associated open space, which should be of lasting benefit to the people who live and work in them. A high standard of design in the built environment is crucial to the creation and the long term maintenance of sustainable communities and should therefore be embedded in the regeneration process.

The governance structures proposed to deliver require further consideration in respect of:

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- i. Whole Government agreement to a specific regional structure that addresses 'whole government' departmental responsibilities and local government collaboration.
 - ii. The specific responsibilities and powers of the proposed Regional Boards, ranging from statutory to advisory functions.
 - iii. The relationship between collaborative Regional Strategies and 'Local Plans'.
 - iv. The interaction with delivery bodies now being formally established in specific regions of Wales (e.g. Strategic Transport Authorities)
 - v. The nature of representation on the proposed Regional Boards. It is likely that enthusiastic membership of Regional Boards from the private and third sectors will only be secured if there is a two-way working relationship with the national and local levels.
 - vi. Establishing indicative funding allocations to regions on a formula basis, embracing finance from a probable range of Welsh government departmental sources.

In terms of investment and 'targeted funding' it is not totally clear as to which activities are considered priority for funding. This may be because there is still a degree of uncertainty regarding the scale of funding available from the HRH department regeneration budget. In this context RSCW considers that priority from the targeted funding should be given to:

1. The needs associated with any 'exit strategies' in relation to the seven existing Regeneration Areas and Newport Unlimited, particularly in respect of the timescale for transition and establishment of legacy. Overall, each of these commitments will:
 - i. Need to be addressed to ensure that the benefits already established within each initiative are maximised to achieve full value for money.
 - ii. Have different time scales for completion, which will need to be established through sound evaluation.
 - iii. Need to be taken to a positive conclusion, with structures and stakeholder partnerships established to build on a firm basis for future progress.
2. Continue to cover for outstanding commitments for Town Centres and Seaside Towns, some of which may be co-terminus with actions taken within 1 above; and for Seaside Towns in conjunction with Coastal Communities Fund.
3. The proposal for evidence, mapping and business cases.
4. From the schedule of 'Successful Places': Town Centre Management; Meanwhile Uses; Business Improvement Districts.
5. The funding position for the remainder of the 'Successful Places' schedule should be considered as lower priority than those in 4 above, as:
 - i. Local Growth Zones seem to be more closely related to the concept of Enterprise Zones and may well have alternative funding from a much larger BETS department budget; or could be funded through RDP as a rural regeneration initiative;
 - ii. Both Enhanced Marketing and Destination Management, Physical reconfiguration of Sites and the future of Housing Renewal Areas all require better evidence and business cases.

Very little reference is made to the funding of regeneration activities through

other WG departmental budget heads, and this issue is fundamental to joined-up government policy and delivery. There are a number of budgets that are of direct importance to the regeneration agenda, in particular those relating to:

- i. Infrastructure: This is important to the Welsh economy and the integrated regeneration agenda and it is vital that Capital Programme funding through the Wales Infrastructure Investment Plan is maximised in order to ensure that the infrastructure can act as a catalyst for regeneration.
- ii. Economic Development: It is necessary to ensure that investment through the HRH and BETS department budgets for regeneration activities are complementary, particularly these investments together can add value.
- iii. Communities First: At the local level, it is important that Communities First and community regeneration programmes are effectively integrated.

This agenda of complementary investment needs to be addressed to ensure that:

- i. The timescale and approval processes adopted by different departments are made more complementary to ensure joined up funding and delivery.
- ii. Any perceived gaps in funding at the regional and local levels can be addressed quickly, to ensure that effective and 'added value' delivery can be achieved.
- iii. The timescales associated with significant private sector investment are fully respected

Clearly the current global and national financial situation, which may continue for many years to come, is likely to impose significant constraints on mainstream public sector expenditure and upon the prospects of generating private sector financial commitment to many parts of Wales. It is already accepted that Welsh Government's core regeneration budget is greatly reduced from that of previous years and RSCW suggests that a focus within the regeneration sector should be given to:

- i. Identifying new models of financial resilience for regeneration activity in Wales complementing similar action taken in relation to the Wales Infrastructure Investment Plan, and
- ii. Maximising the level of finance from the new E.U. Structural Fund programmes (2014 – 2020) that can be directed towards regeneration activity. This places urgency on the need to establish the relevance of the priorities being taken forward by the Wales European Funding Office, the resolution of which could commence during the forthcoming period of public consultation on the European Structural and Rural Development Funds 2014 - 2020 being held between January and March 2013. It is vitally important that specific measures relevant to local and strategic regeneration actions within Wales are addressed through the forthcoming programmes. This should be undertaken with the support and active involvement of external stakeholders as a matter of urgency, in an open and transparent manner. In the context of E.U. funds, clarification is also required as to the evaluation of the 2007 – 2013 programme in relation to regeneration outcomes. This should include the Regeneration Investment Fund Wales (RIFW), which appears not to have met with external expectations in terms of speed of delivery and standards of innovation.
- iii. The continued commitment by Welsh Government to the production of Review Evidence Papers, as prepared by CREW as part of the

consultation process, which can help to inform and influence future funding streams.

6. WE WANT TO ENSURE EFFECTIVE MONITORING AND EVALUATION OF REGENERATION ACTIVITIES; WILL THE APPROACH SET OUT ACHIEVE THIS?

Effective monitoring and evaluation has often been viewed as a low priority “add on” by some who have taken forward project delivery in the past. However, it has become even more essential, given the current financial circumstances of continuing austerity and recession.

Therefore RSCW would support a robust system of RBA and evaluation to ensure high quality Programme and Project Management that will achieve both value for money; and added value through cross sector partnership and cross departmental investment. It is essential that monitoring should also take into account of the long-term nature of the impact of improvement outcomes:

- i. For major capital schemes that can act as broader catalysts for wider regeneration benefits; and
- ii. For communities, where different levels of outcomes (immediate and long term) can be delivered through the implementation of integrated regeneration projects.

It is also considered that there is value in research to gather comparative data, comparing the impacts of strategic regeneration interventions to better evidence the outcomes and benefits; and to help with future prioritisation.

117. The Charity Bank

Introduction

1. Charity Bank is grateful to the Welsh Government for the opportunity to contribute to its Review of the approach to regeneration. The Bank celebrated its tenth anniversary last year. From the period since its launch the Bank has acted to support the activities of community based organisations, including charities and social enterprises. It is this experience that enables it to share its views on and insights into the Welsh Government’s intentions for the development of public policy covering a number of aspects of its strategic approach to regeneration.
2. This submission provides a brief history of the Bank; its business model and sources of funding; an outline of its operations in Wales and its views on aspects of the vision, definition and national outcomes for regeneration.

The Charity Bank

3. Charity Bank is headquartered in Tonbridge. It is represented in each of the devolved nations and also operates throughout the English regions. The Bank is an authorised Bank, regulated by the Financial Services Authority that launched in 2002. Its evolution however predates this date. As part of a market testing process, the Charities Aid Foundation (CAF) established the Investors in Society Fund (‘the Fund’) in the mid 1990s. The initial value of the Fund was £500,000. The reason for setting up the

Fund was to assess the appetite within the social enterprise and charitable sector for debt finance.

4. A successful outcome to this exercise led the CAF Trustees to review the prospects for establishing a Bank whose purpose was to act in the role of a development Bank for the Third Sector ('the Sector'). Charity Bank is now one of a number of entities which service the needs of the Sector, an indication of the extent to which the market has developed since the Bank's launch.
5. The Bank's stated mission, which is enshrined within its Memorandum and Articles of Association, is to finance 'social profit' organisations addressing society's needs, with the support of investors who want a more responsible and transparent use of their money.
6. As well as having this mission, the specific purposes of Charity Bank are:
 - To provide loans and guarantees on beneficial terms to charities or for charitable purposes;
 - To receive donations, and
 - To obtain loans and take deposits on beneficial terms from the public and others.
7. The Bank believes that social change can be supported by the application of social capital. If community bodies, social enterprises and charities are to be effective they need appropriate resources to nurture and implement their strategies. The Bank is a mission-driven Bank that provides affordable loans and guarantees to charities, supported by capacity-building and strategic advice, to help build more sustainable organisations that work to address society's needs and aid the development of communities. This is achieved due to the support of donors, depositors and investors who want to encourage a responsible and transparent use of money.
8. The Bank was launched with an opening balance sheet of £6.4 million. The latest published annual accounts (Year to 31 December 2011) reveal total assets to be in excess of £80 million, with loans to charities standing at over £54 million. The Bank's shareholder register includes CAF and a number of charitable foundations and trusts, including Esmee Fairbairn Foundation, Community Foundation Northern Ireland, the National Council for Voluntary Organisations and the Vodafone Foundation.
9. Charity Bank has a transparent operating model. It takes deposits from savers and provides loans to Third Sector organisations, which must have clear and identifiable social ends. Experience demonstrates a large portion of the organisations the Bank invests in are unable to secure debt funding from the mainstream providers of debt funding on terms that are both affordable and empathetic to the Sector's specific characteristics. For instance, typically, traditional lenders seek personal guarantees from directors. This is a practice eschewed by Charity Bank since it takes the view that as trustees act in a voluntary un-remunerated capacity it would be inappropriate for the development of social finance markets to impose this type of potential personal liability.
10. An advantage of the Bank's approach to meeting the needs of the Sector is that loans recycle wealth and money since they are repayable. In particular, this contrasts with the one-off transfer of funds in the form of

grants. Whilst the Bank believes there should be a variety of funding, the attraction of the Charity Bank's model is that it increases the pool of funds for the whole Sector.

11. Since its formation, the Bank has achieved the following operational milestones (Sources: Charity Bank's banking systems and Borrower Impact Study, 2012. Data covers the period from 2002 unless otherwise stated and is correct as of 30 September 2012);
 - Value of loans approved to date - £173,794,403;
 - Number of loans approved to date – 1,047 (1,006 in 2011);
 - Number of people reached by Charity Bank loans - 3,500,000;
 - Number of organisations receiving Investment Readiness support – over 1,000;
 - Value of deposit book - £77,446,098 (£65,565,815, December 2011);
 - Value of drawn loan book - £62,800,183 (£55,610,428 in 2011, £45,484,000 in 2010, £35,827,000 in 2009);
 - Number of current loan facilities - 403 (325 customers);
 - Value of loans agreed in 2012 -£8,658,040;
 - Loans reaching government designated disadvantaged communities - 60%;
 - Where loans were used to fund a specific project two thirds would not have gone ahead without the Charity Bank loan.
12. As reported in its last annual accounts, Charity Bank “has never been about finance alone.” This statement reflects the role the Bank performs in the development of the Sector and the capacity it offers to help organisations apply funding appropriately and effectively. Loan applications are assessed on the basis of their individual merits, including the anticipated social impact, a critical factor in every lending decision. The combination of this approach together with the assignment of a dedicated relationship manager, who guides and supports customers through the borrowing process and beyond, has resulted in an exceptionally low rate of write-offs, which stands at 0.5% of total lending. This statistic underlines the ability of socially driven entities to be responsible borrowers.
13. From the perspective of Charity Bank's savers it has emerged that a significant reason they choose the Bank is their desire to generate a social impact alongside a financial return. The Bank invests its depositors' money in supporting charities and social enterprises that benefit society. By providing affordable loan finance our borrowers can develop and meet a broader range of social needs. The appeal of this approach can be gauged by the fact that in the latest annual accounts the Bank reported a growth in deposits of £11 million, or 21%, to a figure of £65 million.
14. Charity Bank measures the social impact of its work. Its latest social impact survey revealed summary results as follows:
 - 94% of borrowers found that a Charity Bank loan had made a major or significant contribution to achievement of mission;
 - 41% secured additional sources of funding as a result of the loan;
 - 71% said the loan had contributed to improvements in the way they managed their finances. 70% of these said it had helped make their organisation more strategic in terms of its financial management;

-
- 59% of loans helped borrowers to increase their level of services to beneficiaries/customers.

(Results are based on 190 responses to a survey of active borrowers conducted by Charity Bank throughout 2012.)

Charity Bank in Wales

15. The Bank established a permanent presence in Wales in Spring, 2009. Until this time Charity Bank's interests were largely served by associates. The appointment of a Welsh Director represented a decision by the Bank's Board to commit itself to the development and expansion of its services to social enterprise and the charitable sector in Wales.
16. Within Wales, the Bank has lending relationships with a broad spectrum of organisations. They include entities whose core business is in the fields of the arts and culture, sports and leisure, the environment, re-use and re-cycling, substance abuse, the provision of services for adults with learning disabilities, social housing and community care. Loans have been provided across a range of values from as small as £13,000 to nearly £700,000. A number of loans are a legacy of the Bank's former role as the administrator of the Cylch Investment Programme, a Welsh Government funded scheme that operated between 2008 and 2011, with the purpose of developing capacity within community based re-cycling and re-use bodies who were members Cylch. This appointment, which was the result of a competitive procurement process, involved Charity Bank staff in the provision of mentoring advice to Cylch member organisations.
17. There exist a number of examples of Charity Bank lending funds for projects which are co-funded. In some instances the funding providers are local authorities. In other cases the Bank has provided funding alongside Welsh Government sponsored bodies, including the Arts Council of Wales and Sport Wales. Similarly funding has also been provided alongside the Welsh Government's directly administered Community Facilities and Activities Programme (CFAP).
18. Charity Bank's Welsh based staff possess a range of practical experience of trusteeship of Sector entities, including the chairmanship of Chapter Arts. Its Regional Director has also acted as a Welsh Government nominated Welsh panel member of the BIG Lottery Fund administered, Coastal Communities Fund.

Consultation - Vibrant and Viable Places

19. In this section of its evidence Charity Bank offers a number of general observations about the role of the Sector in meeting Welsh Government's regeneration objectives. In addition, it also addresses a number of specific issues highlighted by the consultation document.
20. The consultation document anticipates (paragraph 3.1) an extended period of slow growth in Welsh public spending. It further highlights "conventional approaches.....are not currently forthcoming." Previous experience suggests local authorities and other bodies responsible for public service delivery respond to public spending reductions by prioritising statutory services with the result that activities which are non-statutory are disproportionately affected by funding cuts. Inevitably, the

Sector, especially those bodies with a reliance on grant funding, will not be immune.

21. In the absence of direct public funding alternative solutions must be sought. Charity Bank has experience of the potential of debt and development grants as an alternative approach. Examples include the Yorkshire Forward Access to Finance programme, providing technical assistance to social enterprises which operated in Yorkshire and Humberside; the Office of the Third Sector's Futurebuilder's Fund aimed at a number of areas, including community cohesion activities; and the Northern Rock Foundation's loan scheme under which the Foundation made a proportion of its reserves available each year for organisations to apply for loans from £5,000 to £500,000.
22. To keep up with demand for its services, Charity Bank intends to broaden the range and depth of its capital to meet its needs over the next five years. It would welcome the opportunity to share with Welsh Government how this might be achieved so it is in a position to help the Sector in Wales meet its potential and contribute to the execution of Welsh Government's regeneration objectives. In line with all Banking institutions, Charity Bank is capable of expanding its level of lending activity by a ratio that is proportionate to increases in the size of its regulatory capital.
23. Vibrant and Viable Places (paragraph 6.1.ii) "acknowledges the breadth and depth of the skills within the (Welsh Third) Sector and therefore wishes to ensure that this is harnessed throughout the review and subsequent programme delivery and development." The Social Enterprise Action Plan for Wales (Welsh Assembly Government, 2009) also acknowledged the potential for growth of the Sector. Charity Bank's Welsh experience echoes this assessment of the potential of the Sector. By comparison with the rest of the United Kingdom, the Welsh Sector tends to fragmentation and has been more reliant on grants distributed by public bodies for its funding. Together these contribute to a lack of scale in the Sector and as a consequence, can hinder its ability to fulfil its potential to deliver services beyond the local and across a broad geographic area. To date, significant use of social enterprise style models to access investment in public services has been restricted to social housing and water services.
24. Over the medium term, the major test facing social enterprise is to act to secure its sustainability. The Sector will not act as a wholesale substitute for current models of public service delivery, but it has the potential to augment and compliment significant parts. A necessary condition for this transformation is access to long-term, sympathetic capital. This can be achieved by tapping into community focussed sources of social finance. Charity Bank's experience indicates the upside is immense and could make a significant difference to the ability of the Welsh Assembly Government to promote projects at the margin.
25. Research into the Sector supports the view there is room for the expansion of social enterprise in Wales. The report Mapping Social Enterprise Activity in Wales (Welsh Assembly Government, 2009) indicated that one third of social enterprises are very small. It should be pointed out that size in itself may not be appropriate for every organisation

but it is nonetheless clear that the bigger an organisation, the greater the impact created. For the Sector to fulfil its potential it must address the challenge of scaling up. One route to the achievement of this outcome is via the application of development capital in the form of sustainable funding and the raising of management and governance skills.

26. Charity Bank is one of a number of bodies in Wales which support the Sector's expansion and growth. Other Wales' wide schemes include programmes run by the Wales Council for Voluntary Action ('WCVA') and the Wales Co-operative Centre. The Centre's programme offers mentoring advice such as business planning, marketing and HR. In the case of the WCVA it operates a loan fund whose purpose is the provision of development capital, aimed at social enterprises. A number of local authorities operate their own schemes; whilst at a more local scale Councils for Voluntary Service also provide mentoring services. These schemes do not always combine the provision of debt funding with business mentoring and the provision of investment readiness programmes. In consequence, funding and advisory services programmes can be fragmented. The approach of the Banks, like Charity Bank, that exist to meet the needs of the Sector, is to bring advisory services and funding together in a comprehensive package. In the case of Charity Bank, due diligence is extensive and therefore capable of exposing institutional weaknesses that require remedy if funding is to be used successfully. In instances where new arrangements need to be introduced, borrowers benefit from the Bank's investment readiness approach which enables the conditions to be in place for debt funds to be used effectively.
27. The Access to Finance programme operated under the name 'Charity Bank in the North' ("CBN"). CBN was a £9.75m programme which ran from 2006 to 2011. Of this £7.5 million was vested in a loan fund. The programme was funded by Yorkshire Forward, the former Regional Development Agency for Yorkshire. Its aim was "to help grow the voluntary and community sector (especially social enterprises) so that they can make a greater contribution to the region's economy, to encourage investment in deprived wards, and to help voluntary and community sector organisations become more financially sustainable and entrepreneurial in their outlook." The funding was designed to provide a package of support to the region's voluntary and community sector. It was intended to engender a form of 'cultural shift' in approaches to funding, not just in funded organisations.
28. The consultation document remarked (paragraph 3.2) on the support provided by the 2007 – 2013 Structural Fund programme for physical regeneration activities. In anticipation of an extension of the programme covering the 2014 -2020 period, Welsh Government has responded to an enquiry by the National Assembly for Wales' Enterprise and Business Committee
- <http://www.senedd.assemblywales.org/mgIssueHistoryHome.aspx?IId=1862> into the European Commission's draft proposals. The 'Charity Bank in the North' Access to Finance programme received European Regional Development Funding. It illustrates the benefits of emulating this approach

and the value of the shift from a grants-based approach to a financial instruments-based approach to meeting the funding needs of the Sector.

29. Charity Bank would like to take this opportunity to register its willingness to maintain a dialogue with Welsh Government as it further develops its views on the approach to regeneration. In particular if it was felt appropriate it would be pleased to amplify the evidence contained in this document.

118. Royal Town Planning Institute

Background

The Royal Town Planning Institute (RTPI) is a membership organisation representing over 23,000 spatial planners; RTPI Cymru represents the interests of almost 1,100 members in Wales. It exists to advance the science and art of town planning for the benefit of the public.

RTPI Cymru's response has been developed by RTPI Cymru's Policy and Research Forum, which has representatives from across the planning community in Wales.

General

RTPI Cymru welcomes the opportunity to contribute to this review of policy approaches to regeneration by the Welsh Government. The RTPI regards regeneration as a holistic process which aims to reverse the economic, social and physical decline of places where market forces alone will not suffice. We believe that the spatial planning system should be placed at the heart of regeneration. The planning process provides the opportunity to enhance the role and capacity of communities as well as balancing community, business, environmental and individual needs. Effective regeneration requires active and meaningful longterm community engagement and involvement, as well as changes to the physical environment. Planners are skilled in both these areas. We note that the new Regeneration Framework is a high level strategic document with little detail, as this is planned to come out of the work done by the three proposed Regeneration Boards.

The consultation notes the reduction in budget and the need for mainstream programmes to contribute to the new Regeneration Framework. It is our understanding that the finance available to support regeneration activities by Welsh Government has already declined and the bending of mainstream budgets is now crucial to the people and places agenda.

Whilst not a direct spatial planning issue, we recommend that reference is also made to Welfare Reform which has the potential to impact significantly on the people and place logic underpinning the proposed Framework.

Below are responses by RTPI Cymru to the specific questions raised in the consultation.

What is your feedback on lessons learnt from delivery to date?

The summary provided of what has happened to date and what is planned in the framework highlights the wide range of programmes that currently contribute towards regeneration and the wide range of Welsh Government Departments across which regeneration is currently delivered.

An issue which it highlights is that a number of these programmes are currently undergoing their own reviews and these will not necessarily occur in line with the timetable for changes to regeneration activity. The implications of any potential conflict or lack of opportunity for complementary working must be minimised.

We note the report by CREW (Annex 3 to the Framework) finds “that common themes exist in all approaches examined”. In particular combinations of policies which address the ‘people’ and ‘place’ agenda have characterised all policies reviewed. A focus on area-based initiatives has also been a common feature in the periods considered and there is a general consensus that delivery at an ‘identified spatial level is a core component of successful regeneration’. We would recommend highlighting this factor.

Should other national outcomes or principles be considered?

The focus on the failure of market forces is the right one. Too often regeneration has been used as a convenient label for any intervention as a means of securing resources. However, a qualification is introduced: “where the correct operation of markets produces outcomes which do not coincide with government’s social or environmental objectives”. A further qualification would be that in some locations there are no markets and the decision to intervene has to take this on board in allocating scarce resources. As the consultation goes on to note “ensuring places that are doing well continue to flourish is important”.

The three outcomes identified in reality cover a wide range of outcomes and most regeneration agendas could fit within one of these. It can be argued that it is helpful to keep outcomes simple and to a minimum to avoid confusion.

Our Principles for Regeneration

The desirability of tying the three principal headings – partnership, strategy and sustainability together should be recognised in the need for coherence or compatibility. The themes noted by CREW above – people and place together, area based delivery at a recognised spatial level should be reinforced as appropriate.

What more can be done to achieve greater coherence and cross cutting action across departments?

What is required is institutional coherence wedded to policy coherence. Significant initiatives, justifiable in themselves, could benefit from increased scrutiny and draw in contributions and linkages from across departments, as is for example the intention with the Wales Infrastructure Investment Plan. This type of corporate working is essential if the bending of mainstream budgets is to happen effectively.

Although it is agreed that this is critical to the success of an integrated regeneration strategy, direction initially has to come from a high level within the Welsh Government.

Do you agree with the national, regional and local approach set out?

RTPI Cymru recognises certain benefits in this approach, but would comment as follows:

Much depends on the detail and in particular the skills of those occupying decision making roles. Reference has been made to relying on evidence as opposed to being politically driven but the experience of past and still existing forums suggests this is often ignored in the allocation of scarce resources.

Local

The role of local authorities in articulating delivery, whilst it is central, ignores the role of elected grass roots organisations, Community and Town Councils, which are not mentioned. They will often be crucial to initiatives and engagement and understanding of place, where local authorities may not have such detailed understanding. They could be useful in linking need with opportunity.

Heavy reliance is placed on the use of Local Development Plans (LDPs). RTPI Cymru would support the use of LDPs in the process, but measures need to be put in place for those areas which do not have an up to date plan or where an adopted plan is being reviewed.

Regional

RTPI Cymru has concerns in resourcing area panels, which may result in front line funds becoming diminished. Clearly it will be important to link regeneration areas to the distribution of EU funding. We suggest attempts towards congruency with EU areas, infrastructure spending, regional transport planning areas and potential city region boundaries. In general, there is not only a need for the boundaries of the three areas to link with other policy boundaries which could have an effect on regeneration, but also to streamline any bureaucracy associated with these functions.

We welcome the intention to map regeneration resources as we believe strongly in the need for mapping current activity and need across Wales to inform resource allocation, both public and private. We recommend that this is done across all Government activities and not restricted to purely regeneration focused activity.

However, this provides only a snapshot at a particular time. To be valuable, it should be part of the monitoring process.

National

A greater understanding of where the proposed National Regeneration Panel will fit into the hierarchy of decision making and who will be on this panel is needed before its acceptability can be assessed. Particularly as this panel will be given significant power to control spending, influence policy and make decisions on actual projects.

The Panel should be linked to other bodies and Welsh Minister decision-making on national infrastructure and investment programs through the WIIP and other mechanisms. Ideally decisions would be informed by a National Development Framework, which was recommended by the Independent Advisory Group (IAG) in its report on the future Planning Reform Bill.

Do you have any comments on our proposals for how we will target and direct our funding?

RTPI Cymru is concerned by the amount of time it will take to develop the business plans which are suggested for each region, and in the meantime what funding will be available.

High level business plans are likely to make it more difficult for people in the community to understand how money can get to them and deliver the regeneration that they want to see at a local level. Delay in developing the detailed plans and an absence of impact on the ground was one of the areas where the Wales Spatial Plan lost support.

We want to ensure effective monitoring and evaluation of regeneration activities, will the approach set out achieve this?

RTPI Cymru agrees that this is critical and that lessons need to be learnt from previous regeneration programmes. We agree with the process proposed but funding is essential for this, if it is to be done well, made accessible to others and kept as part of the rolling programme of activity. We believe that the activities of CREW in supporting evaluation and promoting evaluative techniques appropriate to projects can provide added value to the evaluation process and learning lessons for future activity.

January 2013

119. Sustain Wales

Introduction

Cynnal Cymru – Sustain Wales welcomes the opportunity to comment on the Welsh Government (WG) Consultation “Vibrant and Viable Places.

The following covers our main response to the Consultation and is of an “overall” or generic set of comments.

Cynnal Cymru Response

The key narrative reflects a Sustainable Development (SD) approach, including terminology central to the SD vision that Welsh Government has adopted. This is important, but this approach needs effectively to translate down through all administrative and project levels to become reality. There isn't a clear vision or approach in the strategy document how this will be done. In part, the document still feels that regeneration is being done ‘to’ communities rather than done ‘with’ them. The document does find an important role for engagement with communities but experience in delivering SD approaches suggests that this may not be enough to achieve stated fairness objectives. The role of “co-production” should be explored more fully in the strategy, identifying funding available and supporting communities themselves to direct how it is spent. There is significant research that show that this approach results in more resilient regeneration and helps avoid regeneration becoming gentrification.

The role of intervention in housing is part of the strategy, but is underplayed. Investment following an Arbed approach in energy efficiency provides a significant opportunity; higher quality housing will improve long term fuel poverty and health problems. The total ‘rebound effect’ spend available from energy efficiency interventions – money available to spend that would

otherwise have been spent on energy bills – has significant potential if it is spent locally in communities, as it usually would be. Within the evaluation and evidence base Welsh Government is proposing to develop, research to establish how and where money is spent by regenerated communities, and interventions planned to support this being spent locally, should be explored. Within the national, regional and local objectives/outcomes should be a specific objective on climate change adaptation – ensuring that capital works in particular account for the uncertainty of long term climate impacts, and are built to be resilient to that uncertainty.

The strategy is not clear what happens when the intervention money stops flowing or how exit strategies will be developed. Lessons should be learnt from previous structural funds programmes, and Communities First projects.

- Will successful outcomes decline over time once funding ceases, or will success drive further funding and interventions?
- How will failing interventions be handled? More funding to achieve the intended outcomes, or a cut of funding? Will this exit strategy be clear from the inception of the project so that partners and communities are aware?
- Why is there not a greater role for revolving funds, to fund future regeneration interventions? Investment in cash generating infrastructure, for example renewable energy generation, could be used to fund future intervention.
- Should there not be collaboration with (say) the Community Foundation in Wales to encourage that local endowment funds be set up to give local people some control of their own funding?

Finally, we ask: how will the long term impacts of regeneration interventions on the SD indicators be demonstrated at a national level?

We repeat: we welcome the consultation and we hope that our comments and observations helps to ensure that any would be regeneration reflects issues of sustainability and avoids the problems evidenced in the past.

120. Coalfields Regeneration Trust

Vibrant and Viable Places – New Regeneration Framework
Consultation – January 2013

Response of The Coalfields Regeneration Trust in Wales

Background

The Coalfields Regeneration Trust is the leading regeneration organisation dedicated to improving the quality of life in Britain's coalfield communities. We are a charitable company, governed by a board of trustees with teams deployed across England, Scotland and Wales. We have been supporting coalfield communities since 1999.

Our mission is to work closely with partners and be the key agency to deliver, champion and broker social and economic regeneration for the benefit of former coalfield communities in Britain.

We are funded in Wales by the Welsh Government, supporting diverse activity within the former Coalfield areas of Wales. We look to support health and well

being, prosperous communities, social enterprise development, improved skills, access to jobs and activities for young people. We work in partnership Government and the community to bring forward lasting change and improved community resilience.

What is your feedback on lessons learnt from delivery to date?

We recognise the scale of the difficulties and barriers faced by some of the most deprived communities to directly engage in the regeneration of their communities.

Much more needs to be done to encourage community led regeneration through multi agency partnership work which meets with local, regional and national goals.

There is a need for a national strategic lead with clear objectives, timescales and investment plans that have wide support and are relevant to local communities. Strategies and plans need to be accessible and understandable to all members of the community, and all sections of community need to be able to feed into action and change.

We recognise that the regeneration of people and places is a long process which requires that a strategic vision is clear and well communicated and that there is a continuity in delivery. Chopping and changing regeneration goals can undue work done to date and the focus on regeneration areas over the most recent years should not be undermined by wholesale change in the short term.

CRT welcome the importance placed in the document on forming genuine partnerships to regenerate communities. Lessons need to be learnt from some of the most successful regeneration projects and partnership delivery both in Wales and throughout the UK. A one size approach does not work. Innovative and sustainable models of investment at community level need to be explored. More emphasis needs to be placed on co-operative and mutual models. (Credit Unions/CDFI's etc) legacy funding, landownership, endowments etc . Agree with the policy that Ownership can have a powerful effect on community regeneration especially via Sport and Arts.

Programme delivery should not be too prescriptive at local levels both in spatial terms and delivery methods. Projects must be based on best practice evidence of what works but at the same time embrace innovation and diversity of delivery.

Should other national outcomes or principles be considered?

The CRT agree with the proposed alignment of the National Outcomes with those established for the Communities First programme and agree that the three proposed identify the priorities for people living within the most deprived areas of Wales.

We would argue that an additional outcome should be added which underpins the principles of sustainable development and therefore makes the implicit commitment to improving the environment as a cornerstone to regeneration decisions. The principle of sustainable development also facilitates the promotion of the economic opportunities of the environment and the need to ensure that regeneration activity is long term and sustainable in both vectors.

What more can be done to achieve greater coherence and cross cutting departments?

As identified in the Vibrant and Viable Places consultation document, the purpose of regeneration as defined impacts on all areas of Government and should be supported and integrated into all aspects of Government planning. The underlying principle of Sustainable Development as a cross cutting theme for the Welsh Government should assist with discourse on this agenda – however more could be done to instil a cross cutting strategy for Wales which prioritises the same themes and outcomes for all departments. Tools such as the Tackling Poverty Action Plan allow each department to contribute to common goals and similar regeneration action plans focused on the national outcomes identified which feeds into each Department plan would be helpful. As an organisation working in community regeneration, we have experienced first hand how our regeneration work in terms of outcomes has cross cutting relationships to most Government departments. For example, a project we assist to develop may be a social enterprise (BETTs) – the enterprise may be located in a Communities First area (Communities Dept) delivering training for NEETs (DECELLs) all of which are related to the improved prosperity and long term improvement of the environment of a run down area (Regeneration). For organisations working at a community level, this makes engaging in terms of investment from Welsh Government difficult as budgets are not cross cutting. It may be helpful for the Welsh Government to consider how each department contributes to the national outcomes, what returns could be made on any investment for each particular department and to develop new innovative social finance models through a national regeneration framework budget – bring one point of discourse with Welsh Government, whilst contributing to the myriad outcomes for each department.

Do you agree with the national, regional and local approach set out?

We agree that there should be a national focus as well as devolution to a regional level and local level – however we would be concerned that no structures replicate or duplicate networks and planning forums that already exist.

The engagement of the Third sector and community representation is key to the success of this process and significant consideration is required to ensure full engagement of people within the community. There should be greater flexibility to, encourage innovation, more control at local level, diverse delivery mechanisms and less risk adverse approach.

The Welsh Government should encourage local structures which engage people and are sustainable. Third sector organisations engagement is crucial at a local level and should have equal status in community development and local strategic planning.

Do you have any comments on our proposals for how we will target and direct our funding?

We agree with the need to provide funding in addition to specific regeneration interventions which can be determined at a regional basis.

Revenue to support to allow for clear planning, mapping and development of ideas is also useful – however this should be a time limited and outcome

driven part of the process to ensure that the planning and development stage is not too long, lacking in focus or unlikely to lead to timely interventions. Lessons should be learned from the delivery of the Communities First programme, whereby too much investment in the building of capacity and planning, resulted in delays in real outcome for the people within the community.

We would argue for a further identified strand of investment targeted at community regeneration, small scale local initiatives that can make a big difference to quality of life, local environment, jobs and skills etc by engaging and investing in the Third sector to undertake local and regional initiatives which support and feed into more strategic projects within town centres or regional priorities. This would allow for more flexibility and speed in allocating investment at a local level and also allow for further community involvement in the direct allocation of resources to meet community need.

We want to ensure effective monitoring and evaluation of regeneration activities, will the approach set out achieve this?

Investment and support from Government for the regeneration outcomes should be determined as a consideration of social return on investment and all members of the framework, all sectors should be facilitated with the tools to evidence clearly how the regeneration initiative is improving lives and spaces. The adoption of RBA is therefore welcomed, as long as the commitment to share tools and develop understanding across the piece is demonstrated. It is crucial also to ensure that regeneration spend is correctly procured to maximise benefits for Wales and consideration should be made to measuring how local people are benefiting in terms of jobs and skills, how Welsh companies are supported to grow and how investment is able to lever in additional resources into deprived communities.

121. Seren Group

Vibrant and Viable Places

New Regeneration Framework

We welcome the framework which clearly sets out the importance of an holistic approach to regeneration where economic, community and physical regeneration is linked. It builds on examples of really effective regeneration in Wales where partnership across public, private and third sector with communities and government has been key.

We also welcome the acknowledgement that the RSL sector is playing an increasingly important part in delivering major regeneration projects in local areas. We think that as large social businesses with expertise in effective delivery of both large capital and revenue projects combined with significant community regeneration outcomes we can play a significant role in regeneration in Wales.

Questions

1. What is your feedback on the lessons learnt from delivery to date
There have been tensions and limited communication between local regeneration programmes such as Communities First and larger strategic

projects funded through complex European Funding mechanisms. The former able to deliver on a very local but only small scale basis and the latter delivered by private sector or statutory organisations with less local input. However where this has been overcome such as in the Heads of the Valleys the impact has been significant.

Lessons need to be shared more effectively and small but successful initiatives up-scaled and/or taken up by government and incorporated into mainstream activity and policy. There are some significant examples around employment and skills such as Jobmatch, Intermediate Labour Market and Apprenticeship schemes in the RSL sector.

Communities First also has good examples of effective community partnership structures and community enterprise. The RSL sector has also been playing a part in supporting communities in the development of social enterprise to reduce grant dependency, create jobs and build capacity in management and governance. The active engagement of others, such as the private sector, as mentors and partners facilitated by Welsh Government could make a significant impact on the sustainability of social enterprise and its contribution to local economies. It is sometimes difficult for local regeneration projects and partnerships to persuade the private sector to engage with them, support from local authorities and Welsh Government departments through their existing networks would help overcome this.

We have seen the benefit of working with a dedicated urban regeneration company in Newport Unlimited. They provide the advantage of having a complete focus on regeneration and experienced, knowledgeable staff. The staffing issue is a potentially a problem for some local authorities where a number of such officers have taken early retirement. It is important to have a track record and confidence to take on some of the more complex aspects of regeneration such as compulsory purchase orders.

Many of the regeneration projects we have been involved with have been extremely time consuming and have carried a high degree of risk. The potential for incurring major abortive costs are a real concern. This can be exacerbated in situations where the political make up of a local authority may change during the pre-start period whereby priorities can change. Consideration should be given to how parties can be helped with such risks.

It is important to make best use of any grant funding which is available and to stretch it as far as possible particularly through the introduction of whole market solutions. This requires flexibility in terms of approvals but can deliver much more effective results such as the regeneration scheme we undertook with Torfaen CBC at Riverside in Pontypool in the late 1990s. On that scheme we were successful in obtaining SHG funding to build homes specifically for low cost sale, which is not normally allowed.

2. Should other national outcomes or principles be considered

Yes, the national Regeneration panel will have a key role to play here and its translation into a formal Ministerial advisory group is welcomed. It will however be important that in its membership it retains the expertise and commitment to regeneration that it currently has. There may also be scope

for it to undertake more consultation with the broader regeneration community as it has with the consultation on this paper.

3. What more can be done to achieve greater coherence and cross cutting action across departments

Possibly the use of simple Regeneration impact assessments/checklists when departments are considering major policy change could help to raise awareness. Cross departmental training/awareness raising amongst staff whose work may not have had an obvious regeneration perspective before. The use of outcomes based assessment of results and KPI's should also help with cross departmental communication.

Structures will need to be put in place to ensure cross cutting action as it is unlikely to happen and any scale naturally.

Hopefully the above can be part of an approach which eases the tensions we often come across between local authority staff who are involved in regeneration and their estates teams who are sometimes just focused on maximising receipts. We have been involved in really positive examples where local authorities have ensured that teams across various departments are fully involved from the outset so that they all understand the vision of what is trying to be achieved, such as the Always Regeneration project in Newport.

4. Do you agree with the national, regional and local approach set out
The regional approach makes sense as previous regional approaches have been effective. The most effective approach has been the Heads of the Valleys regional initiative which brought together areas with similar geographic and local needs. The proposed geographical regions work in some cases e.g. North Wales region and South West & Mid Wales, where largely rural communities share similar economic and social issues, although Swansea may be better served in an urban coastal region. The South East Wales region makes less sense where many disparate communities are brought together. Large urban coastal populations are included alongside linear valleys communities and the more rural areas of Monmouthshire and Torfaen. All have different challenges, perspectives and local cultures and identifying priorities across such a large area and population could lead to a lack of cohesion in approach. Following on from this whether the regions follow LA boundaries or not?

For example, retaining and expanding the Heads of the Valleys regeneration area to cover all S. Wales valley communities, developing a coastal region covering Swansea, Cardiff and Newport and including the border county of Monmouthshire with Powys might make more sense.

The recognition that communities also cross boundaries and so allowing some flexibility in regeneration projects would also be useful. This is touched on in 6.3ii but it will need to be identified specifically in the structures.

5. Do you have any comments on our proposals for how we will target and direct our funding

Funding structures need to be accessible and should encourage economic, social and structural elements working together. We welcome the desire to reduce project management and administration costs, an analysis of the reporting processes to reduce some of the unnecessary paperwork and more online reporting and monitoring would assist.

6. We want to ensure effective monitoring and evaluation of regeneration activities, will the approach set out achieve this
RBA is absolutely the right way to go in terms of effectively monitoring and evaluating the outcomes of the framework. It must however be recognised that for many organisations and communities the approach is very new and the concept of outcomes measurement more difficult to grasp initially than measuring numbers and targets. Resources will need to be made available for supporting the development of RBA in all sectors and communities. Communities first has already gone some way to starting this process but understanding is still limited and patchy.

122. Royal Institute Chartered Surveyors

Vibrant & Viable Places New Regeneration Framework Consultation

Thank you for the opportunity to respond to the consultation dated 22 October 2012.

RICS Wales is the principal body representing professionals employed in the land, property and construction sector and represents some 4000 members divided into 17 professional groups. As part of our Royal Charter we have a commitment to provide advice to the Government of the day and in doing so we have an obligation to bear in mind the public interest as well as the interest of our members.

Our detailed response to the Consultation is as follows.

What is your feedback on lessons learnt from delivery to date?

It is important to establish measurable outcomes which give an indication of the success or otherwise of a scheme

The importance of infrastructure. In this respect projects such as the dualling of the Heads of the Valleys road, electrification of the railways and the M4 Relief Road are vital.

A wide variation in the type of regeneration projects ranging from distinctive local cultural events to major road schemes.

A need to think long term. Short-term funding horizons often work against long-term gain. There is also a need for much closer scrutiny of the operation of some of the programmes.

Should other national outcomes or principles be considered?

The outcomes are fairly comprehensive and laudable but it is vital that actual progress extends beyond the rhetoric to improvement on the ground. It is likely that there will be local, regional and national objectives.

Performance indicators should be linked to prosperous, learning and healthy communities and emerge as measures from these themes. For example, how do we measure improved levels of economic activity? This is probably straightforward. However it may be more difficult to establish that there are strong and diverse local economies with private, public and third sectors working together. There will be qualitative and quantitative outcomes. Investment in infrastructure is vital both for job creation and releasing investment potential. RICS Wales feels the planning system needs to avoid the "no" default setting and work with developers and investors.

What more can be done to achieve greater coherence and cross cutting action across departments?

RICS Wales agrees with the key principles for regeneration as set out but it will require a major effort to implement all the key principles at a practical level. We agree that more can be done to achieve greater coherence and cross cutting action across departments but this will require a major culture shift in government organisation..

There will need to be advanced level of information sharing and strong engagement between Welsh government departments, and local authorities. As confirmed by the Simpson review increased collaboration across the public sector in Wales is essential to gain maximum value from limited resources. In practical terms this implies a senior minister responsibility across all sectors and a senior named officer accountable for implementation at a national and regional level.

Do you agree with the national, regional and local approach set out?

There is a case for a regional structure and North, South East regions makes sense. We are less sure about merging the South-West and Mid Wales. Mid Wales is largely rural. However, Swansea, Neath and the Llanelli could be considered a distinct area of their own.

RICS Wales would suggest further clarification as to how it will work in practice. For example what would be the regional structure if the Welsh Government adopt a city region approach.

At a local level Councils have a key role. Care will need to be taken to ensure local authorities have sufficient capacity to handle a key role in regeneration as described especially as they would be involved at a local and regional level National Regeneration Panel to be replaced by ministerial advisory group. The composition will require careful selection if it is to represent the public, private and voluntary sectors. RICS Wales would also like further clarification as to what is going to happen to Local service Boards.

Do you have any comments on our proposals for how we will target and direct of funding?

The proposal for a formula basis is noted but there is no indication of the quantum of money available which is likely to be limited and maybe unlikely to tackle any 'impact' regeneration activity at regional level

RICS Wales supports the idea of mapping to identify areas of need and opportunity .

The list of successful places is supported. Given the attention to the decline of town centres over the last two years highlighted in the Portas review and the E&B Committee recommendations on town centres it is appropriate to provide some momentum to the revival of town centres. With the range of initiatives it maybe that options may need to narrow in light of current resources.

We welcome the proposal to review housing renewal areas and strongly support the drive to improve the current housing stock which has the potential to improve the quality of our aged housing stock, lever in additional funds and promote local employment. The Arbed and WHQS schemes should form part of the mapping scheme previously mentioned

RICS Wales would welcome further detail on the Coastal Communities Fund, the Homes and Places Community Innovation Grant and the Regeneration Investment Fund for Wales. However, we endorse the proposals to adopt Treasury green book principles.

Finally funding should be purely outcome and result based.

We want to ensure effective monitoring and evaluation of regeneration activities; will the approach set out achieve this?

Clear outcomes will be vital and need to be based on information which is collectable. It will be important to collect baseline information on which future major measurement can be based. And this will include qualitative and quantitative measures which establish a baseline position.

Finally, we note the timetable as set out in section 7 and whilst we commend a sense of urgency in pushing ahead it is clearly far more important that care be taken to ensure change proceeds smoothly even if this may on occasion need a relaxation in original target dates.

RICS Wales reaffirms its commitment to regeneration in Wales and would be pleased to work with the Welsh Government in taking forward its proposals.

Other points

We would suggest a more imaginative approach with Welsh Government and local authority owned assets. There are many opportunities for property to be let to businesses who probably could not afford a market rental or outright purchase that could use turnover rents initially to allow the business to grow before eventually moving to a more conventional arrangement. This has the potential to vacant or underused asset back into beneficial use as well as encouraging business start ups. Not much rent is better than no rent and a wasting asset. There is provision in England for local authorities disposing of assets at less than best consideration, and it maybe worth considering whether this could be a useful policy tool in Wales as well.

Finally we would like to mention with regards to Jessica funding that RICS has produced an information paper which we would be delighted to engage with Welsh Government on to get the best possible benefit for Wales.

123. The Civic Trust for Wales

Re The Civic Trust for Wales response to the consultation on 'Vibrant and Viable Places'

6.1 iv The Civic Trust for Wales wholeheartedly agrees that development of heritage assets within the visitor economy of Wales can make a significant contribution to regeneration in urban and rural communities. We estimate that the Open Doors programme, an annual heritage and building festival where buildings open to the public for free every September, brings in an average of £700,000+ per year to the Welsh economy from people visiting places and spending money within the local economy. Open Doors operates through large scale volunteer support, and interests locals as well as those from further away providing another way of linking local people with their surrounding environment. The Civic Trust increasingly works with other organisations and Government Departments to increase the coverage and scope of Open Doors. We look forward to further working with the Regeneration Department of the Welsh Government and local authorities to include sites under development. In 2013 we would like to explore the possibility of working with the Welsh Government Sustainability Units, and others in this field. Visit Wales already supports our work through publishing our blogs, however we would welcome the opportunity to link the Open Doors programme more widely with Visit Wales and the tourism departments of Local Authorities.

Information on Open Doors can be obtained from The Civic Trust for Wales www.civictrustwales.org.

6.3.iii The Civic Trust for Wales endorses the Welsh Government's view of characterisation. The Civic Trust has been working with three local communities to assist them in formulating their own characterisation studies for the towns/places they live. The communities support characterisation as a way of understanding the place they live in and identifying its unique identity. This is being done to identify aspects of local character that should be considered by any new development in the area and also to identify the areas 'Unique Selling Points'. The Civic Trust has produced a toolkit to assist local communities to undertake their own characterisation studies – although some professional support is required for volunteers in the early stages of the project.

124. SEWTA

About Sewta

1. Sewta is the alliance of local authorities charged with developing transport policy and delivering transport projects on behalf of the 10 local authorities in South East Wales and their partners, both in the transport industry and in organisations representing users' interests.
2. Sewta's membership includes the local authorities of Blaenau Gwent, Bridgend, Caerphilly, Cardiff, Merthyr Tydfil, Monmouthshire, Newport, Rhondda Cynon Taff, Torfaen and the Vale of Glamorgan. Partners are the Confederation of Passenger Transport, Arriva Trains Wales, First Great Western, Network Rail, Bus Users UK, Passenger Focus and Sustrans. Sewta works closely with the Welsh Government.
3. Sewta welcomes the opportunity to respond to the Welsh Government's consultation on the Vibrant & Viable Places, New Regeneration Framework.

Sewta's response draws on the Regional Transport Plan, which is the statutory Transport Plan for South East Wales. It was approved by Sewta in March 2010, and has been endorsed by the Welsh Government.

Sewta's Consultation Response

4. In general Sewta supports the themes and recommendations contained within the consultation. The following sections identify our comments regarding the key questions contained in the Consultation Document:

What is your feedback on lessons learnt from delivery to date?

5. Whilst Sewta appreciates the current financial constraints the Welsh Government is subject to, the current process of providing budget settlements on a year-to-year basis restricts the ability to implement long term plans. This can result in a piecemeal approach to reflect the uncertainty of funding, which hampers opportunities to achieve economies of scale and maximise the value of investment.

6. There is a need to ensure key strategic needs are addressed, with the development of action plans to drive implementation.

Should other national outcomes or principles be considered?

7. The document highlights the role of the transport network in facilitating access to key centres. This principle is a key element of the Wales Spatial Plan and the National Transport Plan. The Sewta Regional Transport Plan has also adopted this approach by linking key centres to strengthen the region's 'offer' and stimulate economic activity.

8. Whilst connectivity is critical, it is also appreciated that the environmental impact of movements must be minimised. The Active Travel Bill highlights the need to provide a range of more sustainable travel opportunities, particularly walking and cycling.

These modes also assist cross cutting objectives to assist health and wellbeing.

Public transport can also assist these objectives – particularly where walking and cycling are required to join a service or reach the final destination. This also assists those without access to a car to share the benefits of regeneration initiatives.

What more can be done to achieve greater coherence and cross cutting action across departments?

9. Sewta, being an alliance of the ten local authorities of South East Wales, fully endorses collaboration with relevant partners. Given Sewta's responsibilities for developing and implementing the Regional Transport Plan, we are particularly supportive of the themes contained in the Transport section on page 19 of the document.

10. There is an inextricable link between land use planning and the transport network; therefore there is a need for a regional development framework to ensure close working between these departments.

11. The consultation document highlights the large number of partners that are required to deliver the regeneration agenda. Whilst it is important that relevant partners are involved, it is also imperative this is managed effectively

to minimise duplication and ensure productive collaboration is achieved. It is imperative a lead organisation is identified at an early stage to manage the process.

12. Under governance a regional transport board is proposed. It is possible that other boards may also be proposed (e.g. education, infrastructure, etc). This must be reviewed and planned across all ministerial portfolios to ensure there is no duplication and take account of the capacity of local authorities/regional bodies to participate. The structure should be simplified/rationalised as far as possible.

Do you agree with the national, regional and local approach set out?

13. Whilst regeneration initiatives will be driven at a local level, Sewta is keen to ensure the regeneration benefits of a regionally integrated transport network are maintained. This is typified by the success of the Ebbw Valley Railway in providing a credible alternative mode to access employment opportunities located outside of the immediate locality. With the proposed extension to a new Ebbw Vale Town station, this scheme will also be a catalyst for people down the Ebbw Valley to access jobs and services arising from the regeneration programme in Ebbw Vale.

This investment in infrastructure and services provides regeneration benefits to the local community by stimulating economic activity. Sewta continues to work closely with its constituent authorities in developing Local Development Plans.

14. Sewta welcomes the recognition in section 6.2ii that economic drivers cross local authority boundaries. To this end, the Regional Transport Plan contains a number of interventions to increase connectivity between key regional assets. The region has a number of opportunities to grow sustainable tourism and stimulate regeneration.

These are highlighted in the 'Sustainable Transport within Tourism' Study which was approved by Sewta's Board in 2012.

Do you have any comments on our proposals for how we will target and direct our funding?

15. It is appreciated that there is a finite amount of funding available to support regeneration initiatives; therefore it is imperative this is targeted towards those initiatives that can deliver the greatest benefits. The use of an evidence based approach to prioritise investment is endorsed by Sewta and reflects our approach to scheme appraisal and prioritisation. The use of 'peer reviews' has proven beneficial when comparing a range of schemes, each of which has its own unique merits. This forum is also utilised to challenge the risks and deliverability of proposals.

16. The consultation document identifies a range of funding initiatives that are already in place and it is vital these are fully utilised to maximise regeneration benefits to eligible communities.

17. The adoption of the Treasury Green Book approach also enables benchmarking of initiatives on a UK basis to ensure schemes deliver relatively good value for investment.

We want to ensure effective monitoring and evaluation of regeneration activities, will the approach set out achieve this?

18. The implementation of a robust monitoring and evaluation regime is essential to provide the following benefits:

- Relative impact of interventions,
- Best practice,
- Supporting funding bids,
- Informing future policy, and
- Informing press releases.

19. It is essential that clear, specific and measurable goals are set as part of business case development. The collection of baseline data is critical to inform both preparation and evaluation. There is often a cost associated with the collection of such data; therefore there may be a requirement for an element of development/business case preparation funding to be made available.

Other Comments

20. In addition to the key consultation questions, we would also make the following comments:

21. Sewta welcomes the recognition of the cross cutting role of the transport network in addressing regeneration and wider, related issues.

22. Whilst the private car will account for a substantial proportion of trips in the region, it is imperative that the contribution of more sustainable modes is recognised as fundamental to regeneration schemes. The prioritisation of walking, cycling and public transport will ensure regeneration opportunities can be accessed by the wider population, and are not restricted to those with access to a car.

23. As Sewta has proposed to the Welsh Government in its input into the National Transport Plan (NTP) prioritisation process, there is a danger that transport facilities are overlooked on town centre regeneration schemes, especially if there is no pressure from the funding bodies or policy frameworks that these facilities have to be provided, safeguarded or enhanced. Town and city centres need to be seen as critical drivers for regeneration activity, given their accessibility by sustainable transport modes, and their key role in transport interchange. The provision of good quality sustainable transport links should be required as a component of regeneration / redevelopment schemes, and not as an afterthought.

24. The enhancement of transport infrastructure can act as a catalyst for regeneration and increase footfall. The provision of good public transport links has been an integral feature of a number of re-development initiatives, such as Blackwood Bus Station or the Friars Walk development in Newport. These transport facilities provide a focal point to stimulate development.

25. Freight transport acts as a key facilitator in support of commerce and employment; therefore freight transport requirements should be considered in the development of vibrant and viable places. This also includes measures to mitigate the impact of freight transport and minimise the risk of severance to communities or destinations.

Plans should take account of any developments arising from the Wales Freight Group.

26. The Wales Infrastructure Investment Plan contains a number of transport related schemes which underpin the regeneration agenda. The announcement of the electrification of the Great Western Main Line and South Wales Valley Lines provides opportunities to increase the travel to work area and assist regeneration.

Ensuring that adequate passive provision is made for future enhancements as electrification is implemented will be a critical factor in maximising the contribution of electrification to wider regeneration. To further develop these opportunities Sewta is a core member of the South East Wales Integrated Transport Task Force.

27. The implementation of transport improvements will provide a platform to support Welsh Government economic objectives; therefore close coordination between transport and economic portfolios is required. This will ensure the economic benefits are fully identified and realised. This will assist engagement with the private business/commerce sector to maximise the value of investment.

28. Recent reports highlight the impact of the Severn Bridge tolls on traffic movements across the Welsh border. Future changes to the current toll regime could have a significant effect on the South Wales economy; therefore, the Welsh Government may be required to lead on lobbying Central Government to maximise economic opportunities.

29. The framework/policy would benefit from a detailed action plan so that the specific goals/outcomes are clearly laid out with timescales, who is responsible for delivering them and how.

30. Sewta welcomes the opportunity to participate in this consultation and would welcome future feedback and involvement.

125. Michael Trickey

JRF have not been able to complete a formal, evidence-based response to Vibrant and Viable Places but I have discussed with Josh Stott - their head of the Places Programme - and here are some views below. I suppose in formal terms this is a response from me - not from JRF. If such an approach is OK, I will forward it to officials - or happy for you to do so. Josh (plus John Low and Katie Schmuecker - ex IPPR) would be happy to do a telecon with officials if they would find it helpful.

The starting point is a warm welcome for the document and the commitment that it signals to finding a way forward on this key issue for Wales. Some points we noticed:

- Economic development/skills and city regions – the interface between these and a regeneration strategy is of course absolutely fundamental. This is touched on in the document but it is not clear how the city regional agenda and the regeneration strategy are coming together.
- It is difficult from a JRF evidenced perspective to comment on the pros and cons of different regional etc structures as so much depends on the nature/relationships of partnerships and the commitment of partners to a particular structure. JRF evidence would support the

need for a strategic co-ordinating tier. In terms of targeting funding, there is no conclusive JRF evidence. On the face of it, an approach that ensures resources are not spread too thinly seems right (especially recognising that the budgets are relatively modest) but how one identifies the priority projects is bound to be a contentious issue – do you focus on the areas of greatest need or the areas where you are likely to have the biggest impact? We were not clear whether the regeneration framework is seeking to make every ‘place’ vibrant and viable? Different strategies will presumably be required in different places – boosting and shaping economic growth in some parts whilst seeking to maintain the basic level of viability of others. There is an argument for an honest and frank discussions about realistic strategies that will deliver the best social outcomes in the most deprived places.

- The document appears light on the skills agenda (but perhaps that is covered off elsewhere). There is a para or 2 but the importance of skills does not leap out of the document and does not seem embedded in the strategy. Also, one of the themes that arises from JRF research in regeneration is the lack of mobility and the short travel horizons of the people living in deprived areas – their connectedness to where they live and how this limits their ability to move or travel to work. This issue does not appear to be directly addressed in the Framework.
- Community regeneration – the framework emphasises the importance of bottom up community regeneration and JRF evidence would certainly support this. One question which arises though is the mechanisms for ensuring community regeneration is understood and voice heard within the regional and national tiers. The framework also makes little mention of the role of community groups and in particular the role of community anchors – but again this may be covered off through Communities First.
- One final point is whether the framework could be more explicit on target outputs/outcomes.

126. Community Transport Association Wales

WELSH GOVERNMENT CONSULTATION ON VIBRANT AND VIABLE PLACES
A RESPONSE BY CTA WALES

1 Background to CTA Wales

The CTA is a UK wide charity, operating a country structure, providing leadership learning and enterprise support to member organisations in the third sector who deliver innovative transport solutions to meet the transport needs of their local communities. The CTA also promotes excellence through training, publications, advice, events and development support for voluntary and community transport providers. In Wales, we work to support our members through our offices in Clydach and Rhyl. The Welsh Government has provided funding via its

Integrated Transport Unit to the CTA for several years as “the voice of community transport” in Wales, to enable us to deliver an agreed business plan of support and development services to new and existing community transport (CT) organisations across the country, and to serve as strategic advocate and promoter of the sector.

CT exists to meet the travel and social needs of people to whom these would otherwise be denied, providing accessible and affordable transport to achieve social inclusion.

2 General Comments

- 2.1 Although CTA Wales does not work specifically in the area of regeneration, community transport plays a key role in providing access to a wide range of services for people who are disadvantaged by age (young and old), location (rural and urban), disability, and/or income, and therefore can be considered as having a strong supporting role. Indeed, transport (or lack of it) consistently appears as an issue in relation to many aspects of daily life, particularly for communities that underperform. We are currently delivering a project funded through the Western Valleys Regeneration Area, involving 6 of our CT operator members, to improve access to services for communities across the area.
- 2.2 We are pleased to see that the importance of transport is mentioned several times during the document, and would endorse the outcome of “well-connected communities supported by transport (and broadband connections)” under Prosperous Communities. However, there is no specific reference to community transport (CT) within the document, which mainly concentrates on public transport. CT is run by the community for the community, and often provides opportunities for confidence-building volunteering or small-scale employment locally, as well as delivering flexible, safe and accessible transport to overcome social exclusion. It should be seen as a valid part of a fully integrated transport system.
- 2.3 Transport underpins most aspects of daily life, and it is important that the impact of travel is integrated into wider decision making. The paper states that “sustainable access should be an integral element of planning new services and facilities and the regeneration of communities”, and CTA strongly supports strengthening the role of transport planning in policy development and planning across Departments. In addition to modeling journey time based on car ownership and the availability of public transport services, mapping transport (as suggested in 6.3.iii) and travel impact analyses also need to consider accessibility for people who do not have cars or find it difficult to use conventional public transport services due to disability, age or other factors. This is particularly important in policy areas and for services which are disproportionately accessed by elderly and disabled people (e.g. health and social care services).
- 2.4 It is good to note the paper acknowledges the role, skills and knowledge of the third sector more generally and advocates equal involvement of all sectors in planning and delivery mechanisms. It is

also encouraging that there is a recognition of the need for much longer term programme cycles, which is particularly key for third sector input.

3 In conclusion

CTA Wales, as an all-Wales organisation, would be pleased to work with Welsh Government and key stakeholders to provide relevant expertise and assistance to the new delivery framework at national, regional or local levels, involving our members across Wales as appropriate.

Name: Betsan Caldwell

Organisation: The Community Transport Association (CTA Wales)

127. Hywel Dda Health Board

General Comments

Hywel Dda Health Board and Public Health Wales supports the overall approach taken in this Strategy, including the emphasis on communities and the themes of health, learning and prosperity.

However we feel the framework lacks innovation and imagination and reads very much like an old WDA policy of economic development: the physical regeneration of sites and premises, capital projects and buildings and gives far less on the wellbeing of our citizens and the work of other WG departments such as health and social care, public health and education and children's services, particularly in areas of deprivation. This is a missed opportunity and we would like to see the policy team go back and work closely with colleagues in other departments as this will not support a holistic approach to citizen-centred services but carry on doing what has always been done without real understanding of how regeneration can impact on the population based outcomes we should all be working to and which LSBs are now starting to do at a local level through Single Integrated Plans.

There is recognition that a partnership approach is needed but perhaps more attention should be given to how the local authority regeneration function connects to local partnership planning. Some central direction on how this should be achieved would be helpful.

The exciting opportunity that partners have been working on at a local level – joining up all their strategies into one Single Integrated Plan based on a single Needs Analysis does not seem to be replicated by this WG policy that seems to have been developed in isolation from the other WG policies and newly emerging Bills. There could be real difference made to Wales if for example the Sustainable Development Bill, Public Health Bill, Integrated Health and Social Care Outcomes Framework (underpinning both Together for Health and Sustainable Social Services Bill) were to link strongly with this Framework. This could be in shared outcomes, clear direction of travel on the focus on those with the poorest outcomes which would address inequity and shared monitoring at a Local Service Board Level which could then feed up into a Regional and National picture.

What is your feedback on lessons learned from delivery to date?

Just building sites and premises or out of town retail centres does not necessarily impact on the health and wellbeing of our most deprived communities.

We agree that mainstream services (3.2) is the main way impact can be made on the challenging outcomes we want to see for our citizens and the document is good at describing the delivery programs in place now. However, there are no examples of other WG delivery programmes in other departments and this shows a lack of “joined-up” thinking and policy making which is cited as one of the drivers for this Framework in 2.1. These need to be included for this document to be comprehensive and taken seriously by wider partners.

In 3.2 the paragraph on Sustainable and Resilient Communities is something we wholeheartedly support but more about how this can be done – some ideas on what can be done differently in partnership would demonstrate that this was more than just words and could really signal a change. Examples could be the Rural Development Plan Board which plans to widen its scope to look at planning together across a range of policy areas, including Rural Health, Housing, Transport and we would want to be fully involved in this work to add value to the regeneration work. We are a public health led organisation focused on community and individual wellbeing, not an illness service as the NHS has often been in the past – we want to work with you.

Should other national outcomes or principles be considered?

Yes – we strongly recommend that this Framework does not go further until it links with the work that is being led and co-ordinated by Abigail Harris, Director of Policy for Health and Social Care. This is looking at joint outcomes and will definitely have a read across to this work and some common outcomes. This is a quick win for WG to “join up” and without this there will be another 5-10 years of separate work which if done together could have so much more impact for the money.

These outcomes are fine but very woolly and need to be sharper and more specific – some of the public health Observatory and Regional Learning Partnership outcomes may well be able to sit underneath these to give meat on the bone and then an Results Based Accountability approach which LAs, Health Boards, the Police and third sector have all adopted to could support the monitoring and performance management of these.

What more can be done to achieve greater coherence and cross cutting action across departments?

The WG policy leads and those leading the new Bills should definitely meet up to discuss where the links are and overlaps so that this can be stitched together into one narrative, one story with all the Minsisterial portfolios and policies looking like elements of a cohesive whole. Writing the policies in a co-designed way is harder but will have a much greater chance of delivering something than those written by policy specialists in their own silo areas.

However, this section of the document says all the right things and we would fully support the statements in there. It will be the HOW that exercises us over coming years though.

Do you agree with the national, regional and local approach set out?

Yes – fully agree. It has been helpful to have these collaborative areas and although our Health Board is only part of the SW and Mid, we welcome the chance to plan on a local County basis, a Health Board / Dyfed Powys basis and also on the wider basis with Powys HB and ABMU and associated Local Authorities. The important thing is that we understand what to plan on which footprint.

Do you have any comments on our proposals and how we will target and direct our funding?

Here it is refreshing to find reference to social capital, people and place based regeneration and funding targeted at Communities First areas and the acknowledgement of rural deprivation of a different type.

The only aspect we would like to see added is in the evaluation criteria, something to reflect not just demonstration that the regeneration outcomes were to be delivered but other health, social care, education etc outcomes that could come out of our suggestion that WG policy colleagues combine forces for one coherent overarching policy /set of outcomes.

We want to ensure effective monitoring and evaluation of regeneration activities, will the approach set out achieve this?

Yes, we believe so but please see earlier points on some suggestions for links to outcomes frameworks, LSBs and RBA.

Comments on specific points in the text P4, 3.1 "...consumer patterns of behaviour are changing permanently towards out-of-town and internet shopping"

If the above statement is accepted as irreversible, then it implies acceptance of a retail pattern that further disadvantages those worst off in society, i.e. households without a car and without internet access. In order to improve access to goods and services for all, it is essential that town centre retail activity should be increased.

A Living Streets report highlights that improvements to the walking environment can increase the economic value of, and economic activity within, an area. This can be reflected by the sale price of residential properties and the rental price of retail premises (Sinnott et al. 2011). The report also gives some support to the possibility of reducing shopping associated car journeys, reporting that local retailers overestimated the proportion of shoppers arriving by car (estimated at 41% compared with the actual proportion of 22%, in a Bristol study). Transport for London's 'Town centre study' (Transport for London 2011) found that people who walked to a town centre spent an average of £93 per week there, compared with £56 for car drivers or passengers. Bus users spent £70 per week.

This section ends by stating that regeneration strategies should contribute to tackling “poverty and the issues arising from our current economic climate”. Evidence of the likely detrimental effect of the economic situation on public health is exemplified by a detailed study into grocery-buying habits across the UK (Breadline Britain 2012). It was found that the consumption of fat, sugar and saturates has soared since 2010 and that in the space of two years some 900,000 fewer people are managing their “five-a-day” because of food poverty. The strategy should work with retailers in regeneration areas to ensure access to affordable and nutritious food for all.

P6, 3.3 The promotion of City Regions could be helpful in reducing health inequalities as it may serve to overcome barriers between deprived post industrial areas and relatively prosperous cities. The adoption of a regional approach should contribute to affordable and reliable public transport systems which would improve access to work for those living in areas of high unemployment. It should also ensure that regeneration strategies take account of the geography of the surrounding area (for instance, connections with neighbouring local authority areas), as well as local factors such as major road and rail routes, rivers and mountains.

This section also mentions European Structural Funds (ESF) and the aim to create more jobs via economic growth. Even when jobs exist, individuals who live in disadvantaged areas face many barriers to employment and will need support to overcome these barriers. These include lack of confidence, transport difficulties such as cost and restricted timetables, and the length of the working day when travel time is added. Many parents also find the cost of childcare prohibitive. It has been suggested that a part of ESF could be used to support services which would help to reduce these barriers.

P 10, 4.1 This section brings together the issues of poor health, loss of environmental quality and deprived communities. A recent review completed for Welsh Government on green space and health inequities (Lester 2012) highlighted the importance of good quality green space for recreation. Access to such amenities benefits physical and mental health and increases wellbeing, but deprived areas are inclined to have poorer quality green space than more affluent areas. An effective regeneration strategy will have the opportunity to ensure that all new developments have high quality accessible green space and walkable environments.

The fourth paragraph of this section discusses compensating when “correct operation of markets produces outcomes which do not coincide with governments’ social or environmental objectives”. It could be argued that whether the operation of markets is correct or not is a value judgement and that this word should be removed. Market forces are a value free economic phenomenon which can operate to the benefit or detriment of society.

A report on widening opportunities for people in deprived communities (Joseph Rowntree Foundation and The Northern Way, 2001) concluded that economic growth is necessary but not sufficient. Other factors with explanatory power for improvement include residential mix and community outlook. To turn around a failing local economy, a neighbourhood’s internal and external relationships will need attention. Bonding social capital may already exist but it will be necessary to develop bridging and linking social capital for communities to maximise new economic opportunities.

One of the pitfalls of regeneration is that improvements in housing and economic opportunities may attract new people into an area and possibly displace existing residents. This can appear to improve health in a locality when no real improvements have occurred for some original residents, who have been displaced elsewhere due to increased housing costs.

P 11, 4.3.ii Improving education and skills is an important consideration, as it can contribute to breaking the cycle of generational health inequities.

P14 5.2iii Changing the determinants of health and seeing this feed through into significant improvements in health and wellbeing can be a long term process and the move towards longer programme cycles is welcomed.

P19, 6.1v Planning: Welsh Government has shown flexibility in producing technical advice notes which respond to new evidence, for example, in amending guidance on opencast mining. The planning system should respond to the imperatives for regeneration by encouraging town centre retail and commerce and discouraging out of town developments, which can precipitate urban decline and disadvantage those dependent on public transport.

P19 6.1v Transport: Transport is a basic necessity but Sustrans Cymru (2012) has calculated that more than 30% of people in all parts of Wales experience transport poverty, rising to 60% in the South Wales Valleys. This can limit access to work, education, health care and social participation. Transport policy has tended to focus on car use but a Regeneration Strategy provides the opportunity to give greater consideration to public transport and active travel which can contribute to health improvement and reduction of the carbon footprint.

Encouraging and enabling people to walk or cycle involves action by a number of sectors (NICE 41, 2012), addressing issues which are environmental, social, financial and personal. Real and perceived risks should be reduced and road space should be reallocated to create a more supportive environment. The need for cycle parking and both commercial and residential storage issues should be addressed, together with infrastructure issues that may discourage people from walking, such as lack of convenient road crossings and poorly maintained footways. Walking routes should be integrated with public transport links to support longer journeys. Encouraging walking can be important in tackling inequities in health and facilities such as dropped kerbs and tactile pavement markings can help to make walking routes accessible to people with disabilities and impairments.

P21 Health: Where health is mentioned, the strategy tends to focus on the NHS role in treatment, and fails to acknowledge the important role of preventing poor health. A good description of the wider determinants model of poor health would be helpful in making clear that poverty, lack of skills, and poor education lead to a cycle of poor health exacerbated by health choices, which are themselves limited by personal circumstances.

Our responses to previous sections all relate to the impact of regeneration policies and strategies on health and wellbeing and those working to improve public health are very conscious that most policy has an impact on health and wellbeing. Public Health Wales has close links with the Welsh Health Impact Assessment Support Unit and would support the increased use of health impact assessment (HIA) in regeneration activities. Assessment of likely health impacts within Environmental Impact Assessment is very often

inadequate and it would be helpful if HIA could be made mandatory for regeneration projects in Wales.

P27, Evidence based: Setting out what outcomes are expected and how they will be evaluated is an important commitment and this should include impact on health improvement and reduction in health inequities. This links in to section 6.6.1 on Results Based Accountability and Evaluation.

P28 6.3ii: Whilst the emphasis on sport as promoting fitness, social bonding and transferable skills is welcome, a wider view which includes other forms of physical activity would be useful. Non-competitive activities such as walking groups, dance and exercise classes can confer similar benefits which can also enhance employability. This type of activity is inclusive and accessible to both sexes, all ages and to previously sedentary individuals, with proven success in engaging socially isolated people and those with mental health problems. An over emphasis on sporting achievement can result in people opting out and becoming non-active spectators when they fail to reach or retain the standards to which they aspire.

128. Mari Shufflebotham

1. What is your feedback on lessons learnt from delivery to date?

Lessons learnt to date include,

- Effective regeneration activities need to be a combination of person and place centred activities
- Social landlords are a key regeneration stakeholder and need to link with local and regional activities

2. Should other national outcomes or principles be considered?

- National health outcomes and priorities
- DWP priorities and the far reaching impact and implications of the proposed welfare reforms.
- Embedding literacy and numeracy improvement into all applicable activities

3. What more can be done to achieve greater coherence and cross cutting action across departments?

The establishment of three priority themes for regeneration that are reflected in many national initiatives and programmes such as Communities First should aid this process.

To streamline the process further the LSB and Single Integrated Plan themes could also be brought into alignment.

4. Do you agree with the national, regional and local approach set out?

- The structure of the Regeneration Framework is encouraging; however some consideration should be given of how the framework will integrate with other project structures and footprints. For example it has been proposed that the Communities First regional implementation boards will align with the Health regions which are not coterminous with the regeneration boards.

-
- The framework approach could provide a mechanism for a regionalised integration of Single Investment Plans with Local Service Boards acting as a conduit between local and regional working

5. Do you have any comments on our proposals for how we will target and direct our funding?

- The regeneration framework would be considerably strengthened by the establishment of key priorities/ target areas based on a robust and consistent mapping exercise that would also provide baseline data to measure progress.
- It will be important to continue funding a combination of both capital and revenue projects and activities
- Funding should support both physical and social regeneration
- Funding should be flexible enough to respond to local circumstances and opportunities – The allocation of SRA funding proved effective at this at a local level
- There could be a need for a three tier funding system for priorities at national, regional and local levels
- Participatory allocation of funds could be considered at local levels
- Forward planning to add value and additional regeneration funding through closer working with the third and private sector
- Funding cycles need to be more consistent/flexible

6. We want to ensure effective monitoring and evaluation of regeneration activities, will the approach set out achieve this?

- While an RBA framework to monitor and evaluate activities is welcomed data must be available so impacts can be consistently measured, the data must also be accessible to all stakeholders
- Qualitative as well as quantitative and impact measures should be included.
- While RBA measures change and improvement, mechanisms and scrutiny should be able to identify projects that are not contributing to the delivery of outcomes
- Social impact needs to be measurable
- To be effective the RBA framework will need to be adopted consistently by all key stakeholders

129. Lee Cecil

LEE CECIL, Social Entrepreneur

My observations re Vibrant and Viable Places.

“an integrated set of activities that seek to reverse economic, social and physical decline to achieve lasting improvement, in areas where market forces will not do this alone without some support from government”

I support the Welsh Government taking the political lead and its vision contained in this document one hundred percent.

Wales should be much wealthier than it currently is. This doesn't just refer to money but equally to health, education, employment etc.

You ask for innovation, creativity and thinking outside the box to deliver a new more prosperous Welsh future?

You ask for partnership working across all sectors, to deliver more value for the Welsh pound which again I support whole heartedly.

You speak about the need for investment and the request to leverage/attract more especially from private sources.

Sadly the majority of whom you are seeking responses from don't know how to do what you are requesting?

I have spoken to many people across all sectors who see Vibrant & Viable Places as - duplication, infringement, another group, confusing in respect of what already exists blah, blah etc. etc. Most are outside of their comfort zone and due to this worry are making excuses not to engage. You know this already.

My Suggestions

Are from a successful delivery point of view.

In my opinion these 3 groups, should be virtual delivery teams, which will either choose, quickly their 3 priorities (or be given it by Welsh Government, your choice?) and these tasks should be completed in a given time period.

The management style should be to implement immediately a PLAN, DO and REVIEW (on going and perfect where needed) format of working.

WG need to trust and empower the team to be able to deliver. Teams are always responsible to their up line and this will be no different. The difference is that you are asking these teams to take action and by doing so they will, (not intentionally) upset someone.

Welsh Government need to pick carefully the chair persons of these teams as they are critical to the success or failure of the projects. Each need to be independent, experienced in delivering, be able to communicate at all levels, gain access and influence all sectors including private sector.

Once chosen each team member should be handpicked from across all stakeholders in accordance with the expertise needed to deliver said tasks and their individual track record of delivering.

The teams must report to WG frequently and any changes implemented speedily. Once the task is successfully completed Welsh Government decide to disband the team or change team members to tackle a new challenge (your choice)

130. Federation of Small Businesses

Vibrant and Viable Places

The Federation of Small Businesses Wales

The Federation of Small Businesses Wales welcomes the opportunity to present its views to the Welsh Government on regeneration in Wales. FSB Wales is the authoritative voice of small businesses in Wales. With 10,000 members, a Welsh Policy Unit, two regional committees and twelve branch committees; FSB Wales is in constant contact with small businesses at a grassroots level. It undertakes a monthly online survey of its members as well

as an annual membership survey on a wide range of issues and concerns facing small business.

Introduction

Regenerating Wales' communities to create vibrant and sustainable towns and villages presents a real challenge to policy makers in Wales. Nevertheless, the Welsh Government has significant scope within the devolution settlement to affect real and meaningful change in policy areas that are crucial to the success of businesses in Wales, such as planning and business rates. FSB Wales has proactively engaged with the Welsh Government's regeneration agenda in the past by taking membership of the National Regeneration Panel and by engaging with the Enterprise and Business Committee's inquiry into town centre regeneration.

In order to inform the current consultation, FSB Wales carried out a snap poll of around 400 members across Wales (the results of which are included in annex 1). The focus of the poll was town centre regeneration, building on previous work done by FSB Wales, however many of the concerns highlighted by our members are equally applicable to other areas.

1. What is your feedback on lessons learnt from delivery to date?

The principal observation FSB Wales would like to make from previous programmes is that private sector involvement is essential if regeneration schemes are to have a lasting and sustainable impact on communities. In a similar consultation on European structural funds, FSB Wales has highlighted that by using the private sector, and in particular micro, small and medium sized enterprises, policy interventions can lead to lasting outcomes. FSB Wales would like to see programmes such as communities first place private sector partnership as a key modus operandi in order to ensure that genuine steps are made towards increasing economic activity. In this respect, FSB Wales welcomes the admission by the Welsh Government that "insufficient involvement of the private sector in planning and delivering integrated regeneration solutions" has been a weakness in previous programmes¹.

¹ Welsh Government. 2012. Vibrant and Viable Places [Online]. Available at: <http://wales.gov.uk/consultations/businessandconomy/vvp/;jsessionid=FE9AE57DE8524FB9E2F7D5F61D11599A?lang=en> (accessed 10th January 2013). P.9.

FSB Wales recognises that it is difficult to engage with micro, small and medium sized enterprises that often don't have the time and capacity to play as full a role as they would like to. This is exacerbated by the large number of small programmes that have existed previously. Greater thematic concentration over a longer period could lead to more sustained input from the private sector and could allow for more focused interventions. This is reinforced by statements from the

Welsh Government's Chief Economist who notes; "Evidence of effectiveness in practice is limited because of the difficulties in establishing the counterfactual, but also the multiple, small scale, and temporary nature of many of the interventions. This may point to the case for a smaller number of more major interventions sustained over the longer term"².

2 Welsh Government. 2012. Regeneration: Review of Economic Evidence [Online]. Available at: <http://wales.gov.uk/docs/desh/consultation/121022vvpannex2en.pdf> (accessed 10th January 2013).
3Ibid.

2. Should other national outcomes or principles be considered?

FSB Wales believes that significant emphasis should be placed on the socio-economic aspects of regeneration when considering interventions. FSB Wales would contend that developing economic outcomes leads to favourable social and health outcomes and this opinion is reinforced by comments from the Welsh Government's Chief Economist³. In this respect, the outcomes proposed in the consultation document are robust and FSB Wales appreciates the early emphasis on economic activity. This could be improved by ensuring outcome one: prosperous communities is the overarching outcome for regeneration projects, with its results naturally leading to improved social and health outcomes.

3. What more can be done to achieve greater coherence and cross cutting action across departments?

The cross cutting nature of regeneration policy provides a number of difficulties for successful implementation. FSB Wales members frequently experience difficulties in accessing local authority services where for example the planning department will refuse consent for an application being supported by the economic regeneration department. Clearly, joined up working is not often achieved at local authority level, let alone at Welsh Government level.

In our recent survey of members on this issue the following concerns were highlighted as being of prime importance:

Survey question 1

answered question 394

From the responses received it's clear that a number of government departments would need to be working towards the same objectives in order to achieve a satisfactory result for businesses. For example, the Business, Enterprise, Technology and Science Department on business rates, the Environment and Sustainable Development Department on planning and local authorities for the cost of car parking.

FSB Wales therefore believes that it's vital that all departments, and the civil servants that staff them, are fully aware of the cross cutting nature of regeneration proposals. Furthermore, the Welsh Government should ensure that the regeneration portfolio is properly aligned with the ministerial department that can influence regeneration most.

4. Do you agree with the national, regional and local approach set out?

Local

At the local level, the role of local authorities is crucial and this is recognised in the consultation document. Feedback from FSB Wales members highlights a degree of inconsistency in approach amongst various local authorities in Wales. Returning to the key theme addressed by FSB Wales, namely private sector involvement; local authorities have achieved this with varying degrees of success. When asked about whether local authorities plan services to maximise footfall, our members responded in the following way:

Survey question 4

answered question 370

For town centres in particular, local authority activity can provide a catalyst for business generation on the high street. Dialogue with local businesses is often the key to success in this regard. When asked what would increase leadership in town centres our members suggested the following:

Survey question 10

answered question 356

Unsurprisingly, FSB Wales members believe closer relationships between decision makers and business organisations are most important. This would suggest that business organisations are the main conduit of communication between government and the private sector. However, creating a town centre plan and employing a town centre manager are also worth examining. It's likely that few FSB Wales members have experienced a town with a dedicated town centre manager and therefore the perceptions of the benefits of such an approach may be understated. This may reflect a lack of concerted effort to communicate more effectively with local businesses. Furthermore, the lack of support for BIDs should be considered as part of the issue of wider business rates reform.

For example comments about Flintshire County Council have been largely positive, where each town has been audited for its strengths and weaknesses and town centre managers have been employed to facilitate the relationship between local businesses and decision makers. The Flintshire approach has led to a feeling of genuine partnership with the private sector and a willingness to confront the issues in a holistic manner. FSB Wales believes that this approach has benefited from two clear principles; generating an evidence base on which to build interventions and real engagement with the private sector. These principles should be implemented where possible by other local authorities in Wales in a manner appropriate to their locality.

Regional

The regional level has to date been of limited importance, however, with the implementation of city regions greater regional working will become far more important. Regional approaches to regeneration should seek to include a

strong evidence base and should have a clear and pro-active vision of regional interventions at the outset. It is important that thematic concentration takes place in order to avoid spreading limited funds too thinly over the region.

In terms of the proposals set out in the consultation document, regional organisations should have partnership with the private sector at the forefront of governance arrangements. There should also be significant development of concepts such as Joint Transport Authorities to feed in to regional working, particularly for the transport integration issues. FSB Wales agrees with the rationale for the South East Wales region, with close alignment to the city region concept providing an opportunity to avoid duplication.

In North Wales, the loss of funding for the North Wales Economic Forum has placed the private sector voice under pressure. FSB Wales would like to see greater emphasis placed on meaningful private sector engagement with governance arrangements that are fit for purpose and enable engagement with public and third sector stakeholders. There are currently a number of potential options for future regional working, including the North Wales Economic Ambition Board. FSB Wales is concerned that as part of this process, the voice of the private sector, and particularly of micro, small and medium sized enterprises, could be lost through the new governance arrangements. FSB Wales urges the Welsh Government to ensure the position of the private sector as a key partner is maintained in the future in North Wales. Furthermore, private sector involvement should reflect the diverse nature of the sector with businesses of various sizes and in various sectors consulted regularly.

The proposed South West and Mid Region may prove difficult to operate in the future. The city region concept in south west Wales means specific governance arrangements will be put in place between Swansea, Neath Port Talbot and Carmarthenshire county councils. There is a danger that the divergent nature of the city region and the surrounding, largely rural, counties of Ceredigion, Pembrokeshire and Powys will mean planning appropriate interventions will be difficult. Essentially, the benefits of sharing a city region and regeneration boundary seen in south east Wales will be in reverse.

National

As stated previously, FSB Wales would like to see greater effort placed on cross departmental working within Welsh Government. One method of doing this could be to build on the novel approach used in the Wales Infrastructure Investment Plan by creating a greater Treasury Wales function. This could be used to ensure departmental capital spending is aligned with the Welsh Government wider economic development role and would improve value for money.

FSB Wales is currently represented on the National Regeneration Panel (NRP) and finds it a useful avenue for inputting into Welsh Government policy. Should the NRP evolve into a Ministerial Advisory Group, FSB Wales believes it will be vital to ensure a strong private sector voice in the governance and

appointment arrangements. Working in partnership with the public and third sectors will enable a holistic approach to policy implementation.

5. Do you have any comments on our proposals for how we will target and direct our funding?

The separation of people and place based interventions is an appropriate method for regeneration in Wales. People based regeneration provides an opportunity to increase skills and education in regeneration areas. FSB Wales is clear that SMEs can provide an appropriate delivery mechanism for up-skilling programmes, indeed our recent research has shown that small businesses have a beneficial impact on employing harder to reach individuals, particularly when compared to their larger counterparts⁴.

⁴ Federation of Small Businesses. 2012. Back to Work: the role of small businesses in employment and enterprise [Online]. Available at: http://www.fsb.org.uk/frontpage/assets/fsb1934_back%20to%20work_web.pdf (accessed 8th January 2013).

While a people-based approach has benefits, many will continue to associate regeneration with physical or place-based interventions. FSB Wales largely agrees with the vision set out in the consultation paper. However, there is more scope for involving the private sector in this vision, perhaps by reiterating the importance of economic regeneration (social regeneration features prominently in this section of the consultation).

A number of policy interventions have been identified in the consultation document as a means of delivering regeneration outcomes. Of particular interest are meanwhile uses, local growth zones and business improvement districts.

Meanwhile Uses

Our survey sought to ascertain the impact of the planning process on town centre regeneration for businesses. Interestingly a large number felt that planning policy does not currently protect the high street from out of town development.

Survey question 2

answered question 368

For this reason, FSB Wales would like to see meanwhile uses explored as a means of creating flexibility within the planning system. This could help create a more adaptable high street that can respond to external challenges.

Business Improvement Districts

FSB Wales has previously highlighted the role of small business rate relief in creating viable small businesses, please see the response to survey question 10 discussed earlier. For this reason, FSB

Wales hopes the Welsh Government will continue with the existing rate relief scheme and seek to extend it where possible; small businesses clearly value the role rate relief plays.

Survey question 9

answered question 361

For regeneration purposes, FSB Wales believes that the partial retention of business rate revenue by local government would create an incentive for the use of business rates as a lever for economic development and would increase accountability. This is particularly important where BIDs are used as a delivery mechanism for regeneration. FSB Wales feels that the use of BIDs should not displace activity that should already be carried out by the local authority. This in effect leads to an extra business rate supplement to pay for services that should already be provided. If business rate receipts were localised, the incentive for local authorities to promote growth would ensure BIDs were used more effectively.

Local Growth Zones

FSB Wales believes local growth zones can also provide a viable alternative for the delivery of regeneration. It is important that the Welsh Government accurately evaluates the impact of the pilot project in Powys to ensure that any further development of the principle builds on work already carried out.

6. We want to ensure effective monitoring and evaluation of regeneration activities, will the approach set out achieve this?

FSB Wales believes it is vital to monitor the progress of interventions, particularly against economic criteria and this is reinforced by research carried out by Miller Research titled Evaluation of Current Practice in Relation to Town Centre Regeneration⁵. Of particular interest should be the level of business activity in a given area and the effect physical regeneration has on business start up and survival rates.

⁵ Miller Research. 2012. Evaluation of Current Practice in Relation to Town Centre Regeneration [Online]. Available at:

<http://wales.gov.uk/docs/desh/consultation/121022vvpannex1aen.pdf> (accessed 10th January 2013).

Conclusion

In conclusion, there are a number of challenges facing Wales' towns and villages that the Welsh Government can have an impact on. FSB Wales would like to see private sector engagement and evidence-based interventions being the key themes of future regeneration policy to ensure that Wales is a country of vibrant and sustainable communities.

131. Cartrefi Conwy

Vibrant and Viable Places : New Regeneration Framework
Cartrefi Conwy Response

About Us

Cartrefi Conwy is registered as an Industrial and Provident Society with charitable rules. It was established to instigate a major improvement programme to the housing stock transferred by Conwy County Borough Council in September 2008 to deliver the Welsh Housing Quality Standard by December 2012.

Governance

The company is administered by a Board of Management comprising 15 voluntary non-executive members and 2 co-opted members. From the outset, we recognised the need to establish an effective Board and executive team. Board members come from the local community and include tenants and local authority nominees.

Staffing

We employ 152 committed and motivated staff across our management, maintenance and corporate support functions; the majority of our staff are customer facing. Every member of staff is critical to achieving our vision and plans and we will nurture, invest and develop the skills and competencies of each staff member to deliver outstanding service to all our customers and ensure we become a beacon of excellence in Wales. We have commenced an organisational development review in 2010 to ensure we have the right skills and capabilities to deliver even better performance.

Our key objective

“Creating communities to be proud of”

Mission statement

Our vision is to provide sustainable, affordable, quality homes and services for local communities actively encouraging the participation of everyone and respecting the needs of all.

Values

- Treating people fairly with honesty and integrity
- Committed to and being positive about providing excellence standards of service
- Being an open and forward thinking organisation which provides the services that tenants need
- Listening to customers and consulting tenants on policy and service issues
- A culture of openness, honesty and accountability
- Creating an environment where its employees are valued and realise their full potential

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- Advocate sustainability in all our business and service delivery arrangements
 - Embracing the diversity of our communities

Achieving Welsh Housing Quality Standard

Cartrefi Conwy is starkly aware of its corporate social responsibilities and adopted an innovative approach from the outset to maximise benefits of the £30m improvement spend that committed to providing employment and training opportunities and creating sustainable communities through the improvements programme. This included forming a pioneering tri-partite partnership with the main internal contractor, G Purchase Construction Ltd and local social enterprise, Crest Cooperative that is an exemplar of best practice in combining local employment and training initiatives with waste management and reclamation and recycling of waste materials from the internal refurbishments. Additional partnerships with sub-contractors and local college, Llandrillo have enhanced the benefits of the above partnership creating further training & employment opportunities, and environmental sustainability in our communities. To date the Internals Programme & Externals Programme is employing 320 people of which:

- 61% based within the county of Conwy - the county where we hold our stock
- 95% based within North Wales
- Crest Cooperative recycling initiative has created 274 training opportunities and 7 full time jobs (and growing)

Cartrefi Conwy Response

We support the CHC response in welcoming the fact that the regeneration framework is aligning its national outcomes with those of Communities First and Welsh Government's Programme for Government's objectives and strongly advocate the key principles of Partnership, Strategy and Sustainability that underpin the framework. However we would like to further comment on the following areas:

- Profile of Housing-Led regeneration
- Achievement of whole government approach
- Lack of flexibility for bottom up solutions

Profile of housing-Led regeneration

Whilst reference has been made to the role of housing-led regeneration as part of joined up delivery, Cartrefi Conwy feels that the regeneration framework has missed an opportunity to fully promote the role that stock transfer organisations such as Cartrefi Conwy has played in the economic and physical regeneration of its communities especially during a period of national economic instability. The framework has not fully recognised the benefits for Wales that the Welsh Government funded project i2i which is

managed by CIH Cymru has introduced through targeted recruitment and training and to expand the aims of this project from housing to other areas of Welsh Government work.

Cartrefi Conwy has used the Welsh Housing Quality Standard not just to improve the condition of the property but to facilitate the regeneration of areas through working with existing social enterprise for them to expand their knowledge areas and to provide real work experience and job opportunities for hard to reach groups. Cartrefi Conwy is also using housing led regeneration to work closely with educational establishments to create opportunities within its locality to ensure real life situations for the employees of the future. The framework does not expand on education as a tool for regeneration.

Achievement of whole government approach

We suggest as CHC have done the strategic position of the framework needs to be elevated to enable the aspirations of the Housing, Regeneration and Heritage portfolio to act as a catalyst for joined up delivery across a range of Government departments.

Lack of flexibility for bottom up solutions

Cartrefi Conwy support the CHC concern that the proposed structure for the regeneration framework will duplicate the work of other regional boards for other initiatives. We want to see a strong bottom up approach which allows for flexibility as this reflects the success that Cartrefi Conwy has achieved in delivering its WHQS programme.

Closing comments

Cartrefi Conwy endorses and is committed to this agenda and would be happy to continue a dialogue with Welsh Government officials in discussing how Cartrefi Conwy can continue to develop the regeneration agenda.

132. Boots

A response by Boots UK

Executive Summary

- Boots UK welcomes the opportunity to respond to this consultation. We agree with the vision outlined by the Welsh Government to create vibrant, viable and sustainable communities with strong local economies. Establishing a holistic and long-term plan for regeneration is prudent. We also recognise that the Welsh Government is funding an impressive series of regeneration projects across Wales and would like to see the private sector more directly involved in this programme.
- Successful and vibrant high streets are an essential part of all communities and are vital in building strong local economies. Everyone in Wales engages with the retail sector almost every day: we all invest in it, we all

take part in it and we all have views on it. Retail jobs in Wales account for approximately 10% of the Welsh workforce. The retail sector generates 10% of the GDP of Wales compared with 7% for the UK as a whole and approximately 12% of business establishments in Wales are retail, accounting for 5% of the UK total.

- Boot's experience shows that there is advantage gained through integrated, active and positive management of town centres, highlighting the roles played by public-private sector partnerships such as Business Improvement Districts (BIDs). Boots UK would be delighted to support the Welsh Government in supporting the formation of more BIDs in Wales and developing a credible retail strategy.
- A credible regeneration strategy must also seek to mitigate the health challenges presented by demographic change and population ageing. One-third of adults in Wales have at least one chronic condition, with 13% of these people suffering from multiple chronic conditions (4.3% of the overall adult population).ⁱⁱ
- Community pharmacy is the healthcare centre in the high street and Community Pharmacy Wales estimates that nearly 50,000 visits are made to pharmacies every day.ⁱⁱ Community pharmacies operate where people live, work, shop and travel and are a mainstay on high streets across the country including in deprived areas or rural communities where accessibility to other primary care services are often limited. In smaller, often struggling communities, the pharmacy is often the main destination outlet which draws people who then also visit and support other retail outlets and high street activities.
- Community pharmacy is uniquely placed to deliver accessible and affordable healthcare while driving footfall into retail destinations. As of October 2012 the national town centre vacancy rate for Wales was 15.1%.ⁱⁱ The structural, long term nature of this issue means that town centres and high streets have to develop comprehensive offers to the public to increase interest. This should include retail, healthcare, education, leisure, civic and housing offers. Offering high quality and convenient healthcare services in retail and civic locations is essential in the future of high street and town centre development.

Based on our experience elsewhere, and our support for the success and sustainability of Welsh town centres, we make the following recommendations:

1. There is a need for integrated, active and positive management of our town centres, highlighting the roles played by Business Improvement Districts and other partnerships with local businesses.
2. Effectively monitor the health of town centres, to enable resources to be used in as targeted and effective way as possible. The urban and rural challenges facing Wales are diverse and considerable and a strategy which fully appreciates the social, economic, demographic, political and global pressures that are shaping communities and local economies is necessary and welcome.
3. Local Authorities have a critical role to play in supporting the ongoing development of town centres and high street vitality so as to maintain their role in providing a heart to many communities.

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4. Quality and cost of car parking should be viewed as a town centre attractor, rather than as a form of traffic management or cash generator.
 5. Explore methods to support innovation and new retail start ups.
 6. Planning policy to emphasise the need for focus on Town Centre First policies.
 7. There should be an agreed formal arrangement for dialogue between Welsh government and retail sector appropriate for Wales. This might be a Retail Forum or a 6-monthly meeting between officials and a range of retailers.
 8. Recognition that healthcare will have a significant impact on future infrastructure needs should highlight the pressing need for a coherent cross-sector approach to regeneration.
 9. While extending average life expectancy should remain a goal the Government strategy should focus on reducing the gap between average life expectancy and disease free life years. Successfully addressing this challenge will have a positive impact on the economy and in the delivery of public services.
 10. A targeted approach to addressing health inequalities within 'at risk' communities is imperative to improving the overall health of the nation and reducing a reliance on public services. Particular focus on key health determinants such as smoking, alcohol use and diet could have a significant impact on morbidity and mortality rates among at risk groups.

1. Overview of Boots in Wales

- 1.1. Boots has a long history in Wales. We opened our first store in Wales in 1896 in Swansea. We have two pharmacies that are still in the same buildings that they opened in over a century ago, Pontypridd and Aberdare Commercial Street, both of which opened in 1897. Boots is now the leading pharmacy-led health and beauty retailer in the high street in Wales.
- 1.2. There are currently (December 2012) 101 retail and pharmacy stores in Wales employing around 2,000 employees. Almost all our stores are in town centre and high street locations. In addition, there are also 10 Boots Optician stores in Wales employing approximately 100 people between them. These are also typically in town centre locations. Boots is therefore a significant part of the Welsh business community and especially the town centre retail sector.
- 1.3. Boots is part of Alliance Boots, which also has several other operations in Wales. Alliance Healthcare Distribution Ltd operates a pharmaceutical wholesaling Service Centre in Fforestfach, Swansea. The centre currently employs approximately 200 people and provides deliveries twice a day to every one of the 713 community pharmacies in Wales.
- 1.4. Our success is a result of innovative healthcare research and well-developed knowledge and practice on taking that healthcare to the public. Wales contributes to all parts of this. Boots is committed to making high quality healthcare more accessible and helping to tackle health inequalities through our network of community pharmacies in town and city centres and in rural communities.

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- 1.5. We are conscious of our responsibilities to the communities we serve. We currently have an innovative partnership with Macmillan Cancer Support which is uniquely aimed at making Macmillan advice and support for cancer patients and their families available in the high street in Boots stores. The high street and town centre locations of Boots stores are critical to this partnership. This work is very active in Wales where the Boots + Macmillan Partnership has produced a range of bilingual materials, run joint presentation stands and other operations in the National Eisteddfod as well as at various party political events. There are now 74 Boots Macmillan Information Pharmacists, trained to provide advice and support to cancer sufferers and their families, working in our high street stores.
 - 1.6. Since the establishment of the National Assembly in 1999, Boots has worked closely with the Welsh Government, Assembly Members in all four major parties and Welsh Ministers with responsibility for Health, Social Services, Economic Development, Transport, Environment, Local Government and Finance. The business has contributed to a range of policy discussions and made internal knowledge and expertise available to local and central government officials from public health to spatial planning. Boots contributed written and oral evidence to the Assembly's Business and Enterprise Committee Inquiry into Town Centre Regeneration in 2011-2012.
 - 1.7. We are a founder member, and current Corporate Champions, of the Association of Town Centre Management (ATCM) and continue to work closely with town and city centre managers across Wales. We have led the retail community in shaping the development of Business Improvement Districts across the UK, and have worked closely with Wales' first BID partnership responsible for Swansea city centre and also with the newest Welsh BID in Merthyr Tydfil.
 - 1.8. Boots were pleased to be actively involved in delivering the first 'Yes' vote for a town centre Business Improvement District in Wales - in Merthyr Tydfil - with 63% of businesses voting in favour by number, and 65% by rateable value. A small and strategically important location in one of the most deprived parts of Wales. We are sure the Merthyr experience will be watched with keen interest, as in scale and demographics it is typical of many other Welsh communities considering BID development.

What is your feedback on lessons learnt from delivery to date? Should other national outcomes and principles be considered?

2. Town centres under pressure

- 2.1. In Wales, and across the UK, there is currently great interest in the health of town centres and high streets. However, pressure on the high streets is nothing new: it's been there for more than 20 years. Traditional high streets have increasingly been faced with competition from two alternative retail formats. The first of these is out of town shopping. Between 1986 and 1997 the number of out of town shopping destinations across the UK increased four-fold, with average spend significantly larger out of town than in town. The second source

of increasing competition has been the growth of the internet, where sales could exceed 10% by the end of 2013. These developments will carry on into the future, they are customer driven and will not disappear.

2.2. Although the largest 30 high streets in the UK, including Cardiff, have continued to attract investment, market towns have increasingly struggled to maintain their vitality. Out of town retail has been driven by the growth of supermarkets, which has seen their share of the UK retail market grow from 35% in 1998 to 40% by 2008. Much of this growth has been centred on non food items, traditionally purchased in the high street. Some retail categories are on the verge of no longer having dedicated outlets on most high streets (such as music and photographic).

2.3. If high streets are increasingly being challenged by alternative retail formats, and if we believe they provide a heart to our communities which we wish to see continue for future generations, we need to ensure that they are treated in a fair and equitable way and that the playing field is balanced when compared to the treatment of out of town and internet retail. At present in many policy areas this is not the case.

3. The retail sector in Wales

3.1. While the leisure sector is becoming increasingly important in many town centres, it is the retail sector that is still the main economic driver of footfall in the vast majority of cases. The health and sustainability of the retail sector is therefore crucial to the health and sustainability of the town centre.

3.2. Everyone in Wales engages with the retail sector almost every day: we all invest in it, we all take part in it and we all have views on it. Retail jobs in Wales account for approximately 10% of the Welsh workforce. The British Retail Consortium outlined five key facts about the retail sector in Wales in its 2011 Manifesto for Wales :

- The retail sector generates 10% of the GDP of Wales compared with 7% for the UK as a whole
- Retail employment accounts for around 10% of total Welsh employment
- There are 8,965 retail businesses in Wales operating from 13,670 premises
- Approximately 12% of business establishments in Wales are retail, accounting for 5% of the UK total
- Cardiff is the sixth most important retail destination in the UK

3.3. The Welsh Retail Consortium was launched in June 2012 to represent the broad spectrum of Welsh retailing, large multiple retailers, department stores and independents; selling food and non-food products and services; on the high street, out of town, in community and rural shops, and online. The launch report Welsh Retail: Serving our Communities further underlines the important impact that retailers have in Wales. However, the report also highlights the significant

challenges that the retail sector in particular faces in Wales in the future.

- 3.4. We fully support the Government's plans to support town centre regeneration outlined in *Vibrant & Viable Places*. To ensure that the government and the retail sector fully benefits from these proposals we believe that there would be value in 3 additional actions by the Welsh Government:
 - Including retail sector figures in the monthly economic data published by the Welsh Government Statistics Department
 - Establishing a Retail Sector Forum in Wales
 - Ensuring retail representation on the statutory Government Business Partnership
- 3.5. Retail specialists Verdict Research said, in a report on Wales in December 2010, that "Wales offers significant expansion opportunities for retailers". Verdict commented that Wales is "a difficult region for retailing" and "suffers from a marked undersupply of prime retail space" with "only 18million sq ft of retail space – representing the lowest amount of any UK region and just 6.1sq ft of retail space per person" the second lowest of UK regions and notes that the retail sector in Wales is "dominated by Cardiff and Swansea and with Cardiff having nearly three times the space of third placed Wrexham".
- 3.6. While this provides a useful descriptor for the retail sector in Wales, recent snapshot figures by an authoritative partnership of BRC and the Association of Town Centre Management (ATCM), show a mixed picture of the Welsh retail sector in the second quarter of 2011ⁱⁱ. They show that in a bad period for all UK retail when overall footfall between May and July was 1 % lower than the same period a year earlier and when in the previous 12 months high streets on average have seen the highest drop in footfall of 2.6%, the hardest hit locations throughout the UK were in Wales where there was a drop of 9.2%. However in Q3 and Q4 2011 year on year footfall increases in Wales were significantly higher than across the UK as a whole.ⁱⁱ

What more can be done to achieve greater coherence and cross cutting action across departments? Do you have any comments or proposals for how we will target and direct our funding?

4. Town centre regeneration

- 4.1. Boots is strongly committed to town centres and is actively involved in partnerships to support the sustainability of town centres into the 21st century. Sustainable and successful town centres are now based on multiple sectors, industries and active stakeholders coming together.
- 4.2. Operating in high streets and town centres is expensive and high risk. To create viable and sustainable communities this has to change. There are three key issues we believe need addressing to ensure that high streets and town centres are able to continue operating effectively. Firstly reducing the cost of operating in town centres and increasing the attractiveness of investment is absolutely essential. This means addressing costs such as business rates so that they accurately reflect the challenging business environment and the

multiple benefits that vibrant high streets have for local communities. Secondly, improving the attractiveness of investing in the high street is equally important. This can be achieved through development work such as Enterprise Zones. Thirdly town centers and high streets need managing through open and constructive partnerships.

4.3. There are seven factors that our High Street Customers tell us they want in the future and Boots considers these as the seven key drivers to our town centre success:

- Health - growing concerns over health; and interest in taking more self-responsibility for health
- Convenience - managing the problem of time scarcity in a 24/7 lifestyle
- Individualism - more personal and customised brand experiences near each other
- Connectivity – the need for relationships and belonging, especially in areas of social deprivation and low incomes
- Comfort - safety, simplicity, trust and low crime activity
- Income complexity - increasing mix of high and low consumerism
- Age and life stage complexity – shopping defies age, gender and other stereotypes.

4.4. These seven steps to a sustainable town centre lead us to support the work launched by the British Retail Consortium (BRC) in 2009 called 21st Century High Streets. An update to the report, published in December 2012ⁱⁱ, reviewed progress in the past few years on the programme and sets out next steps to be achieved across the UK. Welsh high street regeneration success stories featured in this programme of action, showcasing good practice for others to emulate.

- A unique sense of place – the development of a unique identity which is effectively marketed to engender consumer loyalty through differentiation. Local partnerships, local authorities and retailers should market a high street's identity effectively.
- An attractive public realm – Creating and managing attractive public spaces. Local partnerships and authorities should actively manage the public realm.
- Planning for success – The creation of a clear strategic vision focussed on the role of the high street to maintain viable retail destinations. Local authorities should develop a plan for success through open consultation with local interests.
- Accessibility – Ensuring affordable and easy consumer access. Local authorities should manage accessibility holistically and responsively.
- Safety and security – High streets must be safe, secure and effectively managed trading locations. Local police should work with retailers to better understand retail crime and its impact.
- Supportive regulatory and fiscal regimes – The cost of operating and investing in town centres must be reduced. Business rates should be affordable and provide cost certainty and the attractiveness of investing must be enhanced.

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- 4.5. These priorities, both for our own business and for the retail sector in town centres more widely, immediately illustrate how the policy agenda for town centres is complicated and sits across several Government departments and Ministerial responsibilities. In the Welsh Government this includes Ministers with responsibility for Finance, Transport, Community Safety and Security, Planning, Local Government, Enterprise and Business. In the Welsh Government Cabinet this only leaves out Education and Health.
 - 4.6. However, there is a role for education especially in the development of relevant skills. Furthermore, the Welsh Government's current development of a range of community pharmacy services, including NHS flu vaccinations, the innovative Discharge Medicine Reviews service and the planned Common Ailments Service to be rolled out from April 2013, also makes NHS Wales a key investor in many Welsh town centres.
 - 4.7. In Wales, Boots is a member of several town centre partnerships and similar local bodies, including in Cardiff and Swansea. These are of direct benefit to the business, as well as to the town centre, where they allow active business engagement in development of the strategy and in delivery especially of parking solutions, anti crime measures, street cleanliness and joint marketing. In our experience effective partnerships are made up of both the public sector and the private sector as active contributors and beneficiaries. Otherwise the regeneration programme becomes an extension of local government policy and delivery. This may result in helpful policies and in financial investment, but it may lead to exclusion of the extensive and practical experience of retailers and others in the high street private sector that may not require financial investment but different actions.
 - 4.8. Boots would welcome this consultation being a turning point in opening up of the largely public sector regeneration approach in Wales in the existing Regeneration Programmes and moving it forward to active involvement and contributions from the retail sector. From this viewpoint the development of the BIDs model in Wales after many years is to be warmly welcomed.
 - 4.9. The business is also in discussion with other town centre initiatives across Wales with a view to further active involvement to assist in understanding of the retail sector and in enhancing the business contribution, financially and otherwise, in town centre development and policy making. Boots is always open to support for specific town initiatives. One such innovative example of the Fishguard and Goodwick App. Fishguard and Goodwick have launched an App for local businesses to use to promote themselves to tourists and visitors to the area, for a small annual fee. It is managed and run by TownGuideApps.com. Boots welcomes this rural community embracing the latest technology to help drive footfall and tourism in an area of West Wales which is currently in economic decline - there has been a number of business close in Fishguard over the last 2 years, with several vacant retail units at present.

4.10. Boots is particularly committed to support for genuine town centre partnerships between local businesses and local government. Structures will include Town Centre Management, Business Improvement Districts and Retail Crime Partnerships.

5. Business Improvement Districts (BIDs)

5.1. There are currently two BIDs operating in Wales; Swansea and Merthyr Tydfil. The Swansea BID, established in 2006, allows 700+ businesses in the city centre to identify key issues that impact on their trading and start projects to tackle them. Its core objectives were transport and access; supporting and attracting business; raising the profile; brightening the city centre; and improving safety and security. The partnership has enabled genuine private sector input and engagement into developing policies in support of a stronger more vibrant city centre in Swansea.

5.2. There are many other communities, market towns and other town centres where Boots believes this model of business involvement and commitment to regeneration and sustainability would work well and have widespread benefits. Size of location should not be the issue, there are many small communities, high streets and market towns with annual BID levy income below £100,000 and experience of developing BIDs in England and Scotland suggests that they may be more effective in these smaller communities where a sense of local ownership is greater.

6. Transport and parking

6.1. Transport and the growth in road transport in particular, is one of today's most high profile environmental issues. Appropriate arrangements for parking can make or break a town centre. Car parking should be viewed as a town centre attractor, rather than as a form of traffic management or cash generator. Transport is vital to the success of the retail industry. Retailers rely on access to transport for the daily operation of their business – to access their customer base, deliver goods, and to enable their employees to reach the workplace.

6.2. The vast majority of consumers use some form of transport to get to the shops – mainly car – and easy access is now a critical factor in any retailer's, and high streets, competitiveness. Where accessibility and car parking is not of sufficient quality or value, the motorist will choose to visit alternative retail formats providing these services, often away from town centres.

6.3. Boots supports the Community Pharmacy Wales proposals in their evidence to the Assembly Committee Town Centre Regeneration Inquiry for bus stop location planning by local councils and transport authorities to consider locations adjacent to high street pharmacies. Furthermore we believe that where parking restrictions, such as double yellow lines, are to be changed, that those affecting pharmacy premises are given additional consideration. Allowing short period parking allows people to access healthcare services more conveniently, ensuring that patients collect prescriptions, receive minor

ailment treatment, flu vaccination or other public health services. These changes would have a noticeable impact for older people and people with a range of disabilities, many of whom will be visiting pharmacies.

6.4. On a larger scale it is important to establish accessible and convenient transport links between towns and cities to encourage people to shop in different locations. The prospect of electrification of the railway Valley Lines will also make a difference to the accessibility of some struggling valley centres, such as Merthyr Tydfil, Aberdare and Ebbw Vale.

7. Building healthier communities

- 7.1. In addition to supporting high streets and local businesses we believe there should be a commitment to improve public health and to build healthier communities. This is essential for meeting the key principles for regeneration outlined in Vibrant and Viable Places: New Regeneration Framework.
- 7.2. Supporting high streets and town centre regeneration and increasing the civic and cultural offer of public spaces creates synergies. By making public services available in more accessible locations there is a real opportunity to reach into communities that may previously not benefit from health or local services. Furthermore improving the offer of a town centre or high street is essential to driving up footfall.
- 7.3. Community pharmacy is the healthcare centre in the high street and Community Pharmacy Wales estimates that nearly 50,000 visits are made to pharmacies every day.ⁱⁱ. They operate where people live, work and shop and are a mainstay on high streets across the country including in deprived areas or rural communities where accessibility to other primary care services are often limited.
- 7.4. Pharmacies currently provide a range of services including, but not limited to, smoking cessation, NHS health checks, medicines use reviews, alcohol and drug user services, sexual health screening and treatment, weight management services, vaccinations, minor ailment schemes and medicines management and adherence support. The current Welsh Government has also developed a range of Wales wide services which will reinforce the viability of community pharmacies in high streets. These include NHS flu vaccinations, Discharge Medicines Reviews and the national Common Ailments Service being rolled out nationwide from April 2013.
- 7.5. Furthermore Boots experiences first hand some of the social pressures of Welsh communities. While the provision of substance misuse services in accessible town centre community pharmacies is largely in the big urban centres, it is increasingly also in the seaside towns, valleys pharmacies and small rural pharmacies. We also provide pharmacy run minor ailments services and treatments funded specifically to address severe health inequalities.
- 7.6. Community Pharmacy provides healthcare that is accessible and convenient. Many operate extended opening hours including weekends when other primary care services are often not available.

The convenient and universal access to highly trained pharmacists providing ready advice and help alleviates the need to visit a GP in the first instance and provides the major point of access to healthcare to those not registered with a doctor.

- 7.7. One major challenge is that people are living longer but are not necessarily living healthier lives. Currently co-morbidity is more likely to lead to prolonged periods of time spent in hospital and the use of multiple medicines treatment. Long term conditions currently account for 70% of the total health and social care spending in England and over 50% of the health budget is spent on secondary care.
- 7.8. There should also be a focus on tackling on health inequalities. According to Public Health Observatory Wales between 2005 and 2008 healthy life expectancy for men in Monmouthshire was 68.2 years compared with 57.1 years for men born in Blaenau Gwent. Disease-free life expectancy for men in the same areas was 63.2 years and 54.3 years respectively.ⁱⁱ In addition one-third of adults in Wales have at least one chronic condition, with 13% of these people suffering from multiple chronic conditions (4.3% of the overall adult population).ⁱⁱ That means that three in 10 adults in Wales have a chronic illness and one in 23 adults in Wales have comorbidity or multiple long term illnesses; a committed approach to prevention is an urgent necessity.
- 7.9. It is difficult to accurately measure the financial impact of poor health on the economy but the costs are undoubtedly significant. In 2008 Dame Carol Black estimated that dealing with sickness of working age people costs the UK Government in the region of £60bn per annum, and that this potentially costs the economy almost £130bn every year.ⁱⁱ
- 7.10. Improving public health is therefore essential in managing public spending and several key steps should be taken. Firstly, recognising the value of disease prevention by addressing key health determinants contributing to illness and disease. Second, by managing long term conditions more effectively through earlier diagnosis and timely intervention. Third, by ensuring services are accessible and convenient and are built around the public need. Supporting patients in their community and avoiding hospitalisation is a well recognised way of avoiding unnecessary costs and is the basis of the innovative Welsh Discharge Medicines Review service in community pharmacy.
- 7.11. Community pharmacy can also have a positive impact on rates of hospitalisation and outcomes in social care. Poor social care leads to higher rates of hospitalisation and poor use of secondary care can lead to increased use of social care. This is not in the best interests of patients or taxpayers. Better long term health outcomes, closer integration between primary care organisations, supportive infrastructure ensuring accessibility to healthcare services and focus on preventative healthcare has a positive impact on our economy and on the communities that we live in. Recognition that healthcare will have a significant impact on future infrastructure needs should highlight the pressing need for a coherent cross-sector approach to regeneration.

Recommendations

Boots has a track record of positive engagement in developing effective dialogue and partnership at local level in support of individual town centre vitality, and is keen to contribute to developing a stronger focus on town centres in Wales. We will be responding to the Welsh Government consultation on The Strategy for Older People in Wales (2013-2023) and we hope that both these consultations are mutually reinforcing.

There are three key issues we believe need addressing to ensure that high streets and town centres are able to continue operating effectively. Firstly reducing the cost of operating in town centres and increasing the attractiveness of investment is absolutely essential. This means addressing costs such as business rates so that they accurately reflect the challenging business environment and the multiple benefits that vibrant high streets have for local communities. Secondly, improving the attractiveness of investing in the high street is equally important. This can be achieved through development work such as Enterprise Zones. Thirdly town centers and high streets need managing through open and constructive partnerships. The recommendations below would support these 3 key objectives.

Based on our experience elsewhere, and our support for the success and sustainability of Welsh town centres, we make the following recommendations:

1. There is a need for integrated, active and positive management of our town centres, highlighting the roles played by Business Improvement Districts and other partnerships with local businesses.
2. Effectively monitor the health of town centres, to enable resources to be used in as targeted and effective way as possible. The urban and rural challenges facing Wales are diverse and considerable and a strategy which fully appreciates the social, economic, demographic, political and global pressures that are shaping communities and local economies is necessary and welcome.
3. Local Authorities have a critical role to play in supporting the ongoing development of town centres and high street vitality so as to maintain their role in providing a heart to many communities.
4. Quality and cost of car parking. Car parking should be viewed as a town centre attractor, rather than as a form of traffic management or cash generator.
5. Explore methods to support innovation and new retail start ups.
6. Planning policy to emphasise the need for focus on Town Centre First policies.
7. There should be an agreed formal arrangement for dialogue between Welsh government and retail sector as appropriate for Wales – this might be a Retail Forum or a 6-monthly meeting between officials and a range of retailers.
8. Recognition that healthcare will have a significant impact on future infrastructure needs should highlight the pressing need for a coherent cross-sector approach to regeneration.

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9. While extending average life expectancy should remain a goal the Government strategy should focus on reducing the gap between average life expectancy and disease free life years. Successfully addressing this challenge will have a positive impact on the economy and in the delivery of public services.
 10. A targeted approach to addressing health inequalities within 'at risk' communities is imperative to improving the overall health of the nation and reducing a reliance on public services. Particular focus on key health determinants such as smoking, alcohol use and diet could have a significant impact on morbidity and mortality rates among at risk groups.

133. Design Commission for Wales

Please find below our comments in response to this consultation document. We hope these are helpful and will be happy to provide further information should it be required.

Comments:

An outcome focused approach is welcomed and requires a serious commitment to early, sophisticated thinking and genuine focus among committed teams at Government and local authority levels. Good practice and other useful evidence emerged in the IAG 2012 report on the Planning system in Wales and could usefully be drawn upon.

Practice evidence of earlier initiatives and delivery practice in Wales can be drawn from the DCFW publications of The experience of the Design Review Panel 2003-2005; 2005-2007 and the forthcoming 2007-2012. These publications can be found on our website at www.dcfw.org and provide detailed case by case analyses of practice in Wales over the best part of a decade.

Housing led regeneration works extremely well and requires sophisticated partnerships, mature relationships with landowners, clear links with LDPs across Wales and should be underpinned by the mix of uses and tenure that crave neighbourhoods, and avoid housing estates. See our comments in response to the Housing White Paper. Procurement is a perennial problem across all sectors including housing and whilst much work has been done, procurement processes still fail to secure quality and value and can still drive out good practice in favour of capital savings which can result in false economies. This should be tackled in earnest as it is one of the strongest barriers to engaging design and delivery talent, and to achieving the desired outcomes expressed.

Enterprise Zones must be of the highest design quality in terms excellent transport connections, high quality public realm and a mix of uses to support critical mass and footfall and avoid isolated and poorly linked architectural interventions alone. The speed of technological advance and working patterns in the 21st century and beyond, must inform these and any business districts. This and other policy documents and action plans must be fully integrated from the Infrastructure Investment Plan through to the raft of Legislation coming through, not least the Planning Bill.

In terms of existing initiatives it is important to ensure they are properly followed through. The Works at Ebbw Vale has some way to go if the successes are to be captured in the long term, and there is much to be done in Newport to mention but two in the south east. Real efforts should be made to deliver these as a whole.

The Design Commission for Wales is a wholly owned subsidiary of Welsh Government and provides early strategic advice, training, capacity building and brokering services as well as its Design Review service. Much better use of our services could be made, rather than simply referring live schemes at a late stage to the Design Review Service. Our early strategic work in Rhyl, Ruthin, Merthyr Tydfil and elsewhere brings partners together to take a strategic, holistic approach and secure commitment early, so as to maximise the potential to achieve shared vision and pursue common aims and stated outcomes. Early consultation adds most value and our services can be flexible in response to need- they are much broader than design review alone.

Regeneration projects must deliver on the design quality aspirations outlined in national planning policy, which should be acted upon at local levels to deliver sustainable places that fully integrate the economic, social and environmental advantages of SD. All approaches to regeneration should be integrated in cross departmental approaches. Highways and transportation must be fully engaged to avoid barriers to regeneration such as adherence to Trunk Roads which can in certain circumstances, form barriers to holistic solutions, such as those we have seen in Milford Haven and Aberystwyth. In a small country the careful repair and stitching together of towns, villages and cities through good urban design and public realm, is more appropriate and successful than expensive gestures. Where projects are facilitated by land reclamation or decontamination more innovative, less risk averse approaches could be taken and reference to case studies held by practitioners such as Ashfield Solutions Cardiff may be useful in this area.

Good design teams should always be appointed so as to deliver good quality development, whatever the scale. Y Maes at Caernarfon and the Drift Park at Rhyl are notable successes. Individual schemes must be driven by a proper response to context, a capturing of landscape assets including good responses to Welsh topography (rather an expensive plateau), a commitment to high quality public realm and sustainability should be fundamental.

Mixed use, facilitating footfall, critical mass, life and activity in well connected neighbourhoods with properly integrated blue/green infrastructure are essential to vibrant places. The challenges of an ageing population must be considered in creating neighbourhoods that facilitate social interaction across generations. Enforced loneliness and isolation contribute to poor health and our sense of safety and well being. Good design is fundamental to good places.

Design is not about appearance alone. There is no such thing as no design. There is either good or bad design. Design is a problem solving process, of analysis, testing and further analysis to achieve solutions. Good design for the built environment will have three vital characteristics: Commodity, Firmness and Delight. In other words it will be fit for purpose, built to last and lift the

spirits. These characteristics are vital to avoid a future legacy of repeated environmental degradation and wasted resources.

According to European sources Design contributes 24% of the UK economy and is recognised as a tool for business innovation. Evidence shows that good commercial buildings support a happy workforce which drives up productivity. In Healthcare good design improves recovery times, especially in cardiac and critical care; It has also been shown to reduce stress and aggression in A&E. Good learning environments better support learning journeys and schools should be flexible, adaptable, inclusive and uplifting places, at the heart of communities where future generations can flourish. Sound asset management for regeneration is vital to securing these characteristics.

In town centres good urban design increases the rate of sales and lettings and can add up to 20% in rental and capital value. Beautiful places lift the spirit, enhance our environment raise our profile as a nation – vital factor in attracting the right kind of investment.

Our cultural richness and heritage is vital for tourism and cultural richness. The historic environment should be a living one, more frequently drawn upon to show not just what we once were but what we can be in the future. What is historic now was once innovation and we should be mindful of the legacy we are leaving in new developments and regeneration efforts. There is a far greater role for our cultural sector as a whole in regeneration and in particular we would height the Child Poverty work being done by National Museum Wales and the Our Museum Project being led by St Fagan's National history museum.

The Welsh Government also needs to place people at the heart of its regeneration policy and join up a whole place approach through the effective use of and engagement with its agencies, not least the Design Commission for Wales which has the expertise, detailed knowledge and experience to assist at the earliest strategic stages, when most can be achieved.

Best wishes
Carole-Anne Davies
Chief Executive
Design Commission for Wales

134. Wales Heads of Environmental Health

Wales Heads of Environmental Health response to WG consultation document 'Vibrant and Viable Places'.

What are your views on lessons learnt from the delivery to date?

Ceredigion CC perspective:

Participation in the delivery of the Aberystwyth Regeneration Programme, regeneration/area improvement schemes in other parts of the County and securing the Purple Flag Award have highlighted the following:-

1. Schemes and projects submitted by local authorities for approval by Regeneration Boards are often prepared by teams which already have annual service plans prepared but take advantage of the opportunity to secure funding for activities associated with their

particular field of specialism. However, the ability to either secure funding for a dedicated project officer or create capacity to oversee delivery of the project means that there are impacts either on delivery of the project or on core service activity.

2. The time constraints that apply to the delivery of schemes create pressures especially in relation to factors outside of the control of the project manager (e.g. weather, reluctant or un-cooperative property owners, clarification of titles of ownership, securing contributions from property owners, availability of contractors, need to execute specialist works which may require particular approvals or consents, etc.)
3. Securing private sector support in schemes requires a considerable amount of officer input to ensure that potential partners understand the nature of particular projects, the community benefit, appreciate the implications for them and their role/contribution to the project, ensure they understand the time constraints that apply, in ability of property owners to secure funding for their financial contributions due to conditions in financial markets, etc.
4. Lack of cohesion, commitment and vision within the business community
5. Absence of community champions
6. Resolution of issues that arise after the completion of projects. These are often complicated and draw in representatives from different professions within the authority (senior managers, legal, finance, etc.) with no ability to cover time inputs and no capital funds to meet any required remedial measures.
7. Inflexible deadlines for funding and completion of projects and management of slippage
8. Added value and greater impacts can be achieved through complementary project 'bending' and convergence e.g. housing renewal areas, Tidy Towns, Purple Flag Award, etc.
9. Appropriately qualified, skilled and experienced coordinators are essential in identifying linkages and mobilising stakeholders and interested groups to deliver local and community based projects. Stimulating and sustaining community pride is particularly challenging and whilst coordinating/leading such activity is time consuming and resource intensive, it will also be a factor critical in the success of any such schemes.
10. The use of targeted and proportionate regulatory interventions can be a valuable component/option in a comprehensive regeneration package as this can provide a 'carrot and stick' incentive that can focus reluctant or resistant minds.

Should other national outcomes or principles be considered

There seems to be a lack of focus and clear outcomes in relation to some areas e.g. housing. There is clear evidence that there are concentrations of poor housing in Wales. Wales Heads of Environmental Health believe that satisfactory housing is a basic requirement and should be the starting point for any integration activity.

Achieving greater coherence and cross cutting action

1. Whilst there is some recognition of the different challenges that rural localities will face and we accept that there will be a desire and incentives to concentrate investment efforts on centres of greatest population, the document does seem to focus on urban settings. Rural areas across Wales are seeing demographic shifts and meeting the needs of the ageing population in these areas will present particular challenges. The concept of 'poverty in paradise' must not be overlooked, where individuals may be living in beautiful localities but can suffer disproportionately if their income and savings are insufficient to meet their living expenses (transport, property maintenance, home heating, etc.).

2. The important contribution that improvements in housing standards can make to regenerating areas is not given sufficient fully recognition in the document. There are passing references to Housing and its importance in creating sustainable communities, however, these links are far too brief and do not provide sufficient weight to the importance of housing to the successful regeneration of localities and communities. By addressing poor quality housing an area will be more attractive for tourism, business investment, prosperity and lead to a general uplift to the wellbeing and vibrancy of an area.

3. There is only brief mention of Housing Renewal Areas, even though the outputs from Renewal Areas usually mirror those of regeneration programmes. For example the document defines regeneration as:

“An integrated set of activities that seek to reverse economic, social and physical decline to achieve lasting improvement, in areas where market forces will not do this alone without some support from government”.

Compare this to the aim provided by WG for Housing Renewal Areas (NAFWC 20/02)

‘To provide a focus and framework to facilitate an increase in confidence levels in and about the area and secure its long term future and positive identity, recognising the social, physical and economic aspirations of those who live, work and visit the area’.

4. With the Specific Capital Grant (Housing Renewal Area funding) declining from circa £25M across Wales per year in previous years to £0 in 2014, now is an ideal time to take stock and consider the learning and experience which have been developed over the past decade and a half in the housing-led regeneration field throughout Wales. Housing-led regeneration has focused on the impact that improvements to the physical fabric of properties has on living conditions, physical, social and mental health and wellbeing of those living in the properties and the areas where

improvements are being made. It could be argued that those in the 'traditional' regeneration field operate on a more commercial/business led regeneration approach. Therefore there is an ideal opportunity with the development of this new Regeneration Framework for the two approaches to learn from each other, develop and move forward. For example, it could be argued that not enough focus has been provided through Housing Renewal Areas on the business opportunities and employment provided/jobs created in the construction industry where HRAs have operated. Through the injection of funding from SCG allocation, when this is matched with private investment as well as funding from other regeneration funding pots e.g. THI, TIG, etc. then the level of investment and impact becomes significant. Such an approach has been made through the Housing Renewal Areas across Wales. For example, in Ceredigion over the past 10 years, all 3 HRAs have been aligned with THI and TIG schemes, and Aberystwyth with the SRA. In Cardigan, in the life of the HRA, 250 schemes worth over £10.4m was invested being made up of £6.4m grant, £4m private investment. Furthermore in these areas, and as part of general housing grant policy, grants to landlords have been linked with affordable housing policy through the use of nominations rights and more recently tied to Intermediate Rent levels.

5. There is significant evidence to prove the strong relationship between Housing and the following: -

- Educational attainment
- Health (mental and physical)
- Aspiration and perceived well being
- Community
- Crime and disorder/ASB
- Social exclusion
- Employment
- Poverty

6. The document recognises the legacy that historic and recent industrial activity has had (and is still having) on communities and locations across Wales. Contamination and pollution of land and water courses, bathing waters standards, drinking water standards and air quality are issues that are a must in consideration in regeneration objectives.

7. Recent extreme weather events are a stark reminder about the vulnerability of some communities and regeneration plans need to take possible future impacts into consideration.

8. Due to the broad ranging impact of regeneration, there becomes an increasing importance for the use of Integrated Impact Assessments. The Public Health Bill currently being consulted upon, mention the importance and potential for making health impact assessments a statutory requirement, therefore it makes sense that these policy areas are linked so that they become more integrated.

National or Regional Approach

There seems to be a lack of evidence to suggest it could be delivered more effectively on a regional basis. Wales Heads of Environmental Health believe

that the necessary strategic approach to housing in particular should be delivered locally.

Proposals for Directing Funding

There appear to be no consideration of as to how resources are targeted to Housing. There are existing funding mechanisms relating to funding led regeneration, for example,, Arbed and Specific Capital Grant. There is a clear case for the funding to continue based on a wide range of evidence.

Effective monitoring and evaluation

Whilst regeneration 'outcomes' have been identified, when it comes to measuring effectiveness the focus appears to centre on funded programmes and achievements linked to the investment. Gathering evidence to identifying whether the longer term outcomes have been met would probably need to be done some time after the completion of the projects but who would meet the cost of this would need to be defined and funded.

135. Cymorth Cymru

A consultation response from Cymorth Cymru

14/01/201

Cymorth Cymru is the umbrella body for organisations working with vulnerable people in Wales. Our members work to assist people who are vulnerable, isolated or experiencing housing crisis, including:

1. people who are homeless, or at risk of homelessness
2. families fleeing domestic abuse
3. people dealing with mental or physical health problems, or learning disabilities
4. people with alcohol or drug problems
5. refugees and people seeking asylum
6. care leavers and other vulnerable young people, and
7. older people in need of support
8. offenders and those at risk of offending

This list isn't exhaustive, and individuals may often face a range of challenges that make it difficult for them to find or maintain a stable home and build the sort of lives we all aspire to.

Cymorth Cymru's members help people address these issues, supporting them to fulfil their potential and build happy and fulfilling lives. Our members work across policy areas – including Community Justice, Social Services and Health etc – with the shared recognition of the key role that housing plays in promoting wellbeing.

We have three overarching objectives:

- To improve the links between policy and practice by ensuring that those working in frontline service delivery understand and are influenced by the wider policy context, and those working in policy development understand and are influenced by the experiences and knowledge of those working on the ground.

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- To ensure that the sector maximises its contribution to the lives of citizens and the communities in which they live by helping to build and develop the sector's capacity and professionalism.
 - To increase public understanding and support for the sector and the work it does in helping people build the lives they aspire to within the community.

Introduction

We welcome the Welsh Government's commitment to a people and place, evidenced based approach to regeneration. We support the Welsh Government in recognising that whilst regeneration can take many forms, it is often community investment or investment in people that delivers the greatest outcomes.

Cymorth Cymru's members work with some of the most vulnerable people in our society and we feel that the Supporting People Programme that funds housing-related support projects plays a vital role in helping people achieve their potential and lead the kind of lives that we all aspire to. When comparing Wales to other parts of the UK, it is clear that Wales is showing the way on investing in people and the Welsh Government has shown its commitment to the Supporting People Programme through recognising the Programme as Wales' 'flagship programme' in the recent Housing White Paper. Given the current unprecedented economic conditions that we face in Wales, ensuring we deliver added value from any public spending is paramount. As such, we feel that the Supporting People Programme needs to feature more strongly within this Framework to ensure that we meet the desired outcomes.

As the umbrella body for organisations working with vulnerable people, our response is focussed in this area.

- What is your feedback on lessons learnt from delivery to date?

n/a

- Should other national outcomes or principles be considered?

We support the vision set out in this Framework and we endorse the definition of regeneration cited within this section. We feel that it is essential to understand the complexity of issues involved in social decline in order to fully reverse their effect and deliver lasting improvement.

- What more can be done to achieve greater coherence and cross cutting action across departments?

We are pleased that this document recognises that a whole system approach is required to fully deliver real change in Wales and we support the use of local need and 'added value' to form part of the strategic drivers for the Framework.

Community Safety

At Cymorth Cymru, one of the ways in which we are trying to realise better cross sector working is through our work in linking into the custodial system and encouraging housing and support providers to work closely with the prison service and probation. We have taken a number of our members into HMP Cardiff to encourage better joint working, co-location of services and coordinated approaches to resettlement and support prior to release. We are

also exploring how housing associations and support providers can improve resettlement success for ex-offenders when they are released from prison by combining an offer of accommodation, support, mentoring and employment opportunities. By providing this holistic approach which overcomes a number of simultaneous barriers an ex-offender faces upon release from prison we are hoping to reduce re-offending rates.

We are also actively working with Wales Probation Trust, NOMs and MOJ to explore how the housing and support sector can contribute more effectively to mainstream offender management services that are likely to be contracted out in the coming years. We are also aware of prison education and skills services being retendered next year and again we see an excellent opportunity here for housing and support providers to contribute to this delivery in a way that joins up provision of education, training and employment, resettlement support, housing and other associated support that may be needed to support offenders upon release from prison (such as mental health, substance misuse for example).

Targeted recruitment

Many housing associations and third sector organisations have developed a number of programmes which aim to tackle worklessness which have proved very successful at effectively engaging and supporting their tenants towards employment. However, more needs to be done throughout Wales to link the housing and support sector into mainstream funded programmes which are designed to support people into employment. Many third sector organisations that are not housing associations also have much to contribute to this agenda. Earlier in the year Cymorth Cymru organised a study visit to Affinity Sutton Housing in Kent where our members learned about how a housing association could deliver services under the DWP Work Programme. As a result of contracting to a Work Programme Prime Contractor, Affinity Sutton was supporting a number of individuals every month into employment, and importantly because it was delivering the contract in an area where its stock was concentrated, 50% of the referrals the organisation received were its own tenants which is an excellent intervention rate for a Housing Association that wants to tackle worklessness within its own stock. This is not an isolated example and there are a number of other similar examples in England and this should encourage us as a sector to explore these opportunities and see how we can work proactively with organisations that deliver mainstream employment programmes.

Much of the responsibility for doing this lies with providers on the ground, as well as organisations such as ours who can advise and support our members to develop these relationships and pursue these opportunities, but we would welcome and support housing having a close link with DFES and feeding into the Welsh Joint Employment Delivery Board and Welsh Employment and Skills Board about the significant role that housing-related support can play in supporting people back into work.

Whilst housing associations are making excellent strides in tackling worklessness, the role of support providers needs also to be recognised as many third sector organisations have developed innovative projects to support the people that they work with. For instance Llamau have used their PAT

Testing social enterprise to offer paid work placements for their service users with support from TSW Training and, as a result, they look set to offer full time employment as a PAT Tester to one of the young people that they work with. Similarly, Gofal have a well developed social business, PS Services, which offers employment opportunities to disadvantaged individuals, and Solas's Cre8 social enterprise again offers excellent training and employment opportunities to the people they support. All of these examples show that support providers also have a key role to play in improving levels of economic activity.

Many of these examples have relied on strong partnership working and linking up different Welsh Government agendas and this is crucial to successfully supporting tenants and service users into employment. Llamau's success has required joint working with TSW Training, Cre8's success has required joint working with ACT, and United Welsh HA have also demonstrated that linking up Welsh Government agendas can be the most effective way to provide opportunities to tenants. By working with Educ8 training, United Welsh HA were able to identify and engage with a number of their tenants and organise an open day for Educ8 to advertise health and social care career pathways involving work placements, and as a result a number of United Welsh HA's tenants have enrolled in Educ8's programme. Rhondda Housing have adopted a similar approach to joint working with Educ8 and this again has provided opportunities for their tenants and demonstrates that as well as targeted recruitment and training, the housing and support sector can adopt a number of approaches to supporting the people they work with into employment, and joint working is a vital part of this. As such, we need to ensure that this is promoted widely across the sector and that this good practice is communicated across the relevant government departments as well.

- Do you agree with the national, regional and local approach set out? We agree with the approach set out in this Framework. As stated in our introduction, we feel that the Supporting People Programme should be given more consideration as to the role it can play in regeneration. In addition to this, the new delivery structure for the Programme could provide an ideal way of both informing local and regional need through the multi-sectoral Regional Collaborative Committees. These committees, as suggested in their name, have representation from across policy areas and would aid in bringing departments together to achieve a common goal.

In the spirit of value for money, we would like to see the considerable amount of work that is being and has already been put into the new delivery structure of the Supporting People Programme further capitalised on through its use in aiding this policy agenda. Given that the Framework alludes to the inclusion of sub regions in addition to main regions, it may be beneficial to emulate the regional structure of the Supporting People Programme and use the multi-sectoral Regional Collaborative Committees as a vehicle for delivery on this regeneration agenda.

- Do you have any comments on our proposals for how we will target and direct our funding?

Evidence based approach

We endorse the use of an evidence based approach as a policy driver. It is vital that we become more sophisticated in understanding the needs of the population so that we can deliver more appropriate services and also so that we can more accurately predict future need. We feel that to do this we need to produce more robust intelligence gathering, such as Housing Market Assessments for example, to help identify potential issues such as population make up, changing demographics due to ageing population or migration patterns, mapping of hate related incidents and community tensions.

We welcome the Framework's acknowledgement that a decent home plays a vital role in helping people lead productive lives. However, it is vital that we understand the needs of the population to ensure that we deliver the right kind of housing with the necessary support and care that may be required in order to deliver the outcomes that we want. It is only through a better understanding of the actual characteristics of each household – i.e. knowing whether there physical support needs or a learning disability within each household – will we be able to provide the type of accommodation needed. As such, whilst we welcome the target of building 7,500 new homes as set out by the Welsh Government in its Housing White Paper, it would be futile to build 7,500 general needs properties if 1,500 households needed specialist adapted accommodation.

Being more sophisticated in the way that we understand the needs of the population, we can then also more accurately predict future housing need. Lord Best's recent proposals suggesting that the best way to respond to an ageing population is to build more extra care and supported housing cannot be overlooked as demographics continue to show an ageing population in Wales and new ways of enabling people to live independently in their own home for longer are sought.

Added value from public investment

We welcome the introduction of the Houses to Homes Programme which aims to bring 5,000 empty homes back into use. In recognition of the hard times Wales' economy is facing and particularly the high rate of unemployment, it is vital that that any public money spent on Government initiatives – such as the Houses to Homes Programme – does as much as possible to lever training and employment opportunities for disadvantaged people in Wales. i2i and housing associations in Wales have done groundbreaking work to make this common practice and it is important that any public investment adopts the 'added value' approach too.

- We want to ensure effective monitoring and evaluation of regeneration activities, will the approach set out achieve this

Cymorth Cymru supports the proposed approach of results based accountability. We believe that it is important to measure the impact on vulnerable people and we recommend that the Welsh Government ensures outcomes for marginalised groups are considered in the evaluation process.

Conclusion

The Welsh Government's commitment to eradicating poverty through the regeneration of communities is laudable. We feel that it is important that a

wider range of organisations that work with vulnerable people are engaged to ensure that the most excluded aren't left behind by regeneration initiatives which has sometimes been the legacy from past initiatives.

We would also like to champion the role of the Supporting People Programme in delivering last regeneration. We feel that the work that of our members in the area of housing-related support as well as the new delivery structure has a much greater role to play than is currently outlined by this Framework.

Cymorth Cymru is grateful for the opportunity to respond to this consultation and would be happy to assist the Welsh Government in engaging vulnerable people in Wales through our members to ensure that we best meet the needs of everyone in Wales.

136. Rhondda Cynon Taf Homes

RCT Homes Consultation Response – Viable and Vibrant Places 14th January 2013

1. Introduction

On December 10th 2007, RCT Homes was established as the first Community Housing Mutual in Wales. The local authority transferred nearly 11,000 homes. At its inception the aspiration to establish a tenant led and owned organisation. The offer document promises established a wide vision for social inclusion and gain.

Over the last five years we have achieved:

- tenant membership base of over 5,000 members with over 700 applications pending
- widespread recognition for mainstreaming tenant involvement
- continuous improvement to the core services offered to tenants
- leading offerings for tenants to address financial, social and digital inclusion
- a group structure providing a diverse portfolio of complementary services, operating across several counties in Wales
- become a significant provider of work place based education and learning opportunities
- partnerships with local authority, private sector, social housing and education sectors
- recognition as a leader in Corporate Social Responsibility within the sector recently becoming Wales Responsible Company of the Year 2012
- Marked significant cultural change through achievement of Investors In People Bronze Award

2. Looking Forward

Our new Five Year Corporate Plan builds on our achievements and anticipates that within the next 12 months we will achieve a number of significant milestones:

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- meet the promises made at transfer (subject to those whose timelines extend beyond 5 years)
 - Improving the physical landscape by achieving WHQS
 - Continuing to improve the environmental landscape by undertaken a £10million pound investment in our neighbourhood spaces
 - Significant investment in sheltered housing stock (three year project)
 - receive our first regulatory judgement (HARA) from Welsh Government
 - met many of the requirements set down in the transfer agreement with RCT CBC
 - Commence our first new build development
 - Invest in and further modernise our housing services using tenant and neighbourhood insight
 - Prepared for anticipated benefit changes through further development of our holistic approach to financial and digital inclusion
 - Continue to deliver major regeneration projects through Meadow Prospect including the Tower Fund, implementation of the Community Enterprise Network,
 - Continue to develop social enterprise solutions that support better outcomes for our communities and promote social and educational inclusion such as Ziggies.

In 2012 the Minister for Housing Regeneration and Heritage instigated a policy review of the Welsh Government's approach to regeneration. Three key messages from the review were:

- Strengthened governance is needed to improve delivery. In particular, there is an opportunity to drive regional collaboration in a more structured way, including effective spatial planning for regeneration.
- Partnership is critical. Sustainable regeneration can only be delivered through genuine engagement with communities, local authorities and other public sector organisations, the third sector and the private sector.
- The Regeneration Areas approach is transforming some of our most disadvantaged places, but there are still opportunities to improve the way the Welsh Government and its partners invest at local level.

'Vibrant and Viable Places' describes the Welsh Government's approach to addressing these issues. The document sets out a vision, definition and national outcomes for regeneration, which reinforce the breadth of activity which needs to be considered. It also emphasises the need for partnership across Government and beyond.

3. Proposal of National Outcomes:

Eradicating poverty is a key priority for Welsh Government, the Welsh Government visions is that 'everybody in Wales should live in vibrant, viable and sustainable communities with a strong economy', to achieve this they are attempting to align programmes to focus on achieving common outcomes. The desired strategic outcomes for the regeneration framework have been aligned with the Communities First programme and are as follows (further details are contained within the consultation document previously circulated):
Outcome One: Prosperous Communities

Outcome Two: Learning Communities
Outcome Three: Healthier Communities

4. RCT Homes Consultation Response

We recognise and appreciate the Consultation response provided by CREW, we support their feedback and wish to use this consultation response to add to this response with some practical experiences as a leading third sector regeneration organisation in the context of the consultation proposals.

Question 1:

What is your feedback on the lessons learnt to date?

Local regeneration strategies vary considerable in the quality and ambition of each local area. We know that a real barrier to the successful delivery of national strategy in local interpretation and implementation. Welsh Government might benefit from a understating how well aligned local policies are to national policy. Those local strategies that can be shown to be delivering on both local and national priorities should be highlighted as examples of good practice. This approach will help to develop the evidence base around what is known to work, what is realistic and achievable in terms of national policy ambition.

Regeneration activity and solutions should not be limited by local authority boundary areas, many successful outcomes have been through flexible collaboration – support for this approach should be championed and continued.

Many of the Communities First projects were very successful in engaging local people and building capacity,

Where changes do occur, they are mostly the result of, and dependent on, the staff resource within the communities (rather than directly funded projects).

This accounts for the lion's share of Programme funding and is essential in enabling two key drivers of change – the engagement and empowerment of communities and influencing the activities of agencies and service deliverers. However, programme bending, where it has happened, has still been bottom-up rather than top down. Locally we are able to show examples of successfully programme bending, through our property energy improvement programme, combining, ARBED, CESP, LCBT, HOV funding and our major improvement programme to deliver whole neighbourhood solutions to property retrofit. However, the success of this programme was a result of flexibility and opportunities and communication undertaken by public, third sector and private sector partners. Arbed II has been beset with delays and missed opportunities because the flexibility and funding criteria of the scheme fundamentally changed. Over the last 3 years we have been able to lever in, programme bend and invest £28 million to improve the thermal efficiency of our homes and those privately owned in our neighbourhoods. As well as being warmer, these homes are also more attractive and have had a massive impact on the satisfaction that people feel living in their homes.

Question 2:

Should other national outcomes or principles be considered?

We think that the vision for Wales is appropriate and supports the identification of the national Outcomes. However, in order to ensure the delivery of this vision, clear implementation structure and accompanying guidance is essential.

This approach will help to ensure clarity on what outcomes are as a direct consequence of direct funding, as well as those outcomes that are unintended (but potentially positive). In addition, it is important that there is sufficient focus on sustainability, especially in light of Welsh Government's forthcoming Sustainable Bill.

Question 3:

What more can be done to achieve greater coherence and cross cutting action across departments?

A whole Government approach to this agenda and that all departments will "sign up to" the regeneration approach is commended.

The approach expounded by the proposals is not inconsistent with other national policy approaches relating to community and wellbeing. For example Welsh Government's Sustainable Development Scheme, Anti-Poverty Strategy and so on.

The WG leadership role in both strategic oversight and supporting the delivery of its strategic objectives is critical to the success of the future programme.

The sufficient resourcing within Welsh Government Programme Management will be critical. Likewise, careful consideration over membership of the WG programme board will be critical to help balance these priorities and ensure coherence in programme management and maximise opportunities to programme bend at the Welsh Government level.

The consultation document does not make it clear how Welsh Government will achieve greater coherence and cross cutting action across departments. Further information would be valuable.

Question 4:

Do you agree with the national, regional and local approach set out?

Key to the delivery of the national policy will be the promotion and maintenance of local empowerment while working flexibly, collaboratively and strategically to best support disadvantaged communities and community regeneration in RCT.

Locally, as a key stakeholder and facilitator of community regeneration, we make a significant contribution of the housing function to the achievement of both people and place based regeneration. Our unique relationship with some of our poorest communities creates opportunity for direct engagement and empowerment of disadvantaged groups. We agree with CREW that a clearer identification of this role in the finalised Regeneration Framework.

Example

The Tower Fund, designed as a result of community impact funding from Tower Colliery (for every tonne of coal that is sold from the opencast mining, 44pence is being put into a community fund) – will be spent in the surrounding communities of Hirwaun, Rhigos, Penderyn and Penywaun. A total of £7 million will be available to communities over the next 7 years.

Anyone who lives in one of these four communities can apply for a grant from the Tower Fund. Grants will be available to support all sorts of community projects – big and small, legacy and short term. From social enterprises and ‘green’ energy schemes to training opportunities and youth projects. Primary school children, local residents came together to create a ‘community picture’ of ideas for how the money could be spent in their area. Ideas that were added to the community picture included convenience stores, skate parks, allotments, libraries and start-up businesses.

The ‘Tower Fund’ Development Co-ordinator, The Co-ordinator has already set up committees in each village. The committees are made up of representatives from the areas who will democratically decide which projects are awarded funding from the Tower Fund to benefit their communities.

Working with key community partners, we are working to ensure that we are able to collaborate to identify and support the delivery of legacy projects (through matching this funding to other funding streams) – some of which will undoubtedly be in the development of sustainable social enterprises. Ensuring strategic support from the local authority will also be vital in order identify early opportunities for collaboration in economic regeneration projects.

We agree with the local, regional and national approach see out, but acknowledge that key to the success at each level is dependent on the connectivity and communication between with layers. The need for a cohesive regional approach is acknowledged, however, whether or not there is a requirement for regional boards, or capacity within existing structures to deliver a regional agenda will benefit from further discussion.

Furthermore, whilst recognising that regeneration is not limited to regional boundaries, the document needs to ensure that spatial, regional public sector and city region enterprise opportunities are integrated.

Question 5:

Do you have any comments on our proposals for how we will target and direct our funding?

Funding based on stringent geographic areas and need has been show to have limited impact (reference to the evaluation of the communities’ first programme, 2010). CREW rightly highlight concerns that some of the most disadvantaged communities in Wales will be abandoned if they cannot demonstrate opportunity for development.

“Recognising that opportunities can be both place-based and people-based. Place opportunities can take the form of landscape assets, heritage assets, proximity to markets (labour and goods/services), sense of place characteristics and effective transport and broadband linkages. People opportunities can take the form of strong civic associations, a developed community hub or development trust, well supported faith groups, strong sporting clubs and active cultural organisations. All of these can form the spring-board for local regeneration activity”. CREW Consultation Response January 2012

It would be helpful if the Welsh Government could provide further information to regeneration agencies on the level of funding across Wales and specifically the formula that will be used to allocate funding to the regions

The benefits of targeting funding to housing led regeneration are proven, not least in the success of renewal areas. We acknowledge that grant funding is limited and likely to reduce further in forthcoming years. Accessing private sector funding and developing innovative financial models to support regeneration will also be critical and the current progress in developing the Welsh government solutions to housing led regeneration. We have set up Porthcwllis as an arm's length development company, to act as a gateway for other RSLs, Local Authorities and public sector organisations to access new affordable housing opportunities. This will support the Welsh Government's target for the supply of affordable homes and a critical aspect in the delivery of local regeneration, mixed and diverse economies.

Affordable housing and affordability remains a critical piece in the regeneration jigsaw for the Welsh Government. We support the renewed commitment from Welsh Government to release land that will contribute to providing more affordable homes and town centre regeneration – this needs to be extended to include release of surplus land in the ownership of other statutory authorities and agencies. There are areas of opportunity within the South Wales Valleys where investment in key sites can open up economic benefits across the region such as employment, retail and tourism sites such as Treforest, Taffs Well, and Pontypridd (See City Region Final Report) We would hope that national policy going forward, focuses on supporting investment in areas of sustainable and long term investment opportunity, especially areas that do not benefit from existing structural funds programmes.

Question 6:

We want to ensure effective monitoring and evaluation of regeneration activities; will the approach set out achieve this?

Measurement of impact has been difficult on both a local and national level and proposals to introduce a results based mechanism and establish performance indicators to measure outcomes is welcomed. Using an RBA approach is helpful in providing the consistency, we would however emphasise here the importance of investing in a robust and consistent data collection format. Results Based Accountability (RBA) is not straight forward and there may be a considerable requirement for support and training. Particularly since these impacts will need to be robust enough to withstand public scrutiny.

The approach for monitoring and evaluation needs to be implemented by all deliverers of the strategy. It is important that the data can be collected in a format that does not require complicated and costly IT systems. Carrying out evaluation on longitudinal outcome indicators will not give the necessary information to understand impacts and outcomes in the short and medium term. A series of evaluation phases from inception through to completion would therefore be appropriate for the delivery of the strategy.

As a third sector organisation we are aware that we provide invaluable support to the strategic objectives of our local authority partners, however we think that some of this work, and the work of others does not get captured or reported at a strategic level, so the true impact of a local areas regeneration

activities is not reported and there is a danger of under 'attributing' the collective regeneration activities in regeneration areas.

The consultation indicates considerable emphasis on collecting information and evidence at the local level. It would be helpful to know how this information will be used to set regional priorities and potential projects.

The resourcing of a highly motivated and skilled core team at the Welsh Government level will be essential in driving the new structure forward, proving the necessary support and securing the essential buy-in from local and regional organisations. It may not be realistic to believe that these major structural changes to the programme will be embedded without considerable support from the Welsh Government.

137. Pick Everard Regeneration Team

Response

1. Feedback on lessons learnt from delivery to date

The Importance of the Private Sector:

- The consultation document correctly recognises that previous regeneration cycles have existed within very different conditions. They have been largely public sector led and managed, with significant funding and delivery coming from public sector sources.
- Successful public sector delivery has resulted in major public buildings, infrastructure and public realm, and in some cases this has been adequate to lever in substantial private sector investment. However, this success has tended to be in larger cities/Regeneration Areas, or more prosperous towns that are in any case attractive to investors.
- There has been much less success where general conditions are not conducive to private sector investment. There is a suggestion in the document that conventional approaches to regeneration were largely appropriate. In our opinion, this has not always been the case and the failures and weaknesses need more consideration and emphasis. Unless we understand why previous approaches have been successful or unsuccessful we will be much less likely to succeed this time around.
- In our experience, previous regeneration has often stalled, or been limited by a lack of understanding of commerciality, private sector delivery processes and the pre-requisites that are essential for facilitating private sector investment. There are many examples where landowners and investors have been supportive and eager to deliver, but have been unsuccessful because fundamental barriers have not been addressed. In many cases, there has been a great deal of willingness and aspiration, which has led to high levels of frustration.
- The document recognises the need for partnership and joined-up working. However, it focuses largely on public sector partnerships, which have often been strong and successful. Apart from the final bullet point, there is little reference to the failure (generally) to create genuine working relationships with the private sector investment and development industry, or to ensure that their knowledge, skills and

experience are an integral part of the whole process, informing this from the outset. This has significantly hampered regeneration, and resulted in the private sector being unable to take over the role of delivery. In many cases, therefore, regeneration has stopped after public sector interventions. These have not had the 'seeding' or unlocking impact that was expected – because they did not address the problems that were blocking private sector delivery and did not put in place the essential pre-requisites. Unless this is recognised, it is likely that these mistakes will be repeated in the future.

- In the future private sector driven cycle, it will be absolutely critical that a different approach is taken. There must be a thorough understanding of commercial blockages and potential, and how these can be overcome and unlocked. This can only be achieved if knowledge, skills and expertise in private sector delivery is engaged from the outset, to inform the whole regeneration process. The private sector will not be able to deliver unless the conditions are conducive to commerciality, viability and market forces. The New Regeneration Framework must address the mechanisms and requirements for achieving this.

The Regeneration Process:

Regeneration Plans and Procurement Processes

- The process for producing regeneration strategies, masterplans and action plans has often been flawed (from the outset of the process). Without an adequate understanding of private sector regeneration delivery, many local authorities are unable to fully identify core problems or identify what is required.
- The briefs produced by local authorities, for the preparation (by others) of masterplans and action plans often pre-determine the problems and fix budgets, timecales and outputs before the real issues/needs have been researched and assessed. This constrains and 'leads' the results of the study. As an example, consultants have been engaged to produce a masterplan but analysis identifies the need for a transport study: if time and money have not been allowed for this additional work the masterplan has to proceed without it, based on assumptions, as consultants are contractually obliged to deliver within the agreed timeframe. Some, more experienced local authorities have recognised this (to some extent). However, this approach is not the norm and this needs to be addressed.
- Furthermore, the procurement and selection approach for the appointment of consultants to prepare masterplans and regeneration strategies, usually pays inadequate attention to the need for commercial delivery skills and experience. This often leads to a process-driven approach, led by designers rather than experts in regeneration delivery. This has often led to a significant weakness in the commercial and delivery aspects of regeneration plans, and it is for this reason, in our opinion, that many have stalled or 'been shelved'.
- In our observation, many of the recent/emerging town centre studies have generally been simplistic in their evaluation of the problems or opportunities. They have usually failed to identify root problems or the

strategic reasons why problems exist and why they have not been overcome, the pre-requisites required to attract investors/occupiers and the potential opportunities to reverse the problems and maximise opportunities.

- Whilst the studies are generally very good in terms of physical analysis and reporting of socio-economic and physical conditions, they are generally simplistic in their commercial analysis and tend to focus on symptoms rather than strategic core problems.
- The studies often leap from analysis of physical/socio-economic problems to design/use solutions for key sites. Whilst they generally include simple capacity studies and development costs for delivering these 'solutions', these have usually been prepared with little or no input from potential commercial investors or operators. Before they are tested by the market (and found to be undeliverable) they have generally raised public expectations, cost significant amounts of money and gained political support. The position becomes entrenched and it is very difficult to 'undo' recommendations. Plans become 'shelved' at best, but in some cases continue to be upheld as policy, and actually serve to frustrate delivery. The process of preparing regeneration strategies and plans has (often) been flawed in the past, and we must learn from these mistakes and inadequacies before engaging in a new round of town centre studies and regeneration plans.
- The weakness in the preparation of realistic, deliverable town centre strategies is not recognised in the document, and as a consequence there are no identified mechanisms for addressing this.

Skills

- In a public sector driven cycle, some local authorities have achieved a great deal of success through public sector schemes. In some situations, the public sector has also had some significant success in securing private sector investment and delivery. However, this has been largely limited to larger local authorities, regeneration agencies and Regeneration Areas, where a greater range of skills and expertise has been available. Outside of these, smaller or less well equipped local authorities (without the private sector awareness or delivery skills) have struggled to reverse decline or create the economic or physical conditions that are critical for private sector investment. Delivery has been small scale and superficial rather than pump-priming and sustainable.
- In our opinion, the New Regeneration Framework does not take adequate account of this weakness and problem during regeneration to date. The emphasis is still on public sector processes and interventions. There is a danger, therefore that the skills issue will not be adequately addressed going forward.
- The lack of skills and knowledge in respect of commerciality and the private sector delivery process, together with the lack of commercial/private sector input at all stages of the process has been a fundamental problem with previous regeneration programmes, and

must be appropriately addressed. This is not adequately taken into account in the consultation document.

- It is agreed that innovative practices and greater ability are emerging, but these are not available to all local authorities. It would, of course be unrealistic to expect each authority to engage in-house the whole range of specialist skills. The cost would be prohibitive and there are simply not enough regeneration skills to go around. Ironically, the local authorities with least access to resources are often those that have responsibility for some of the most difficult and commercially unattractive areas, where the need for skills is greatest.
- A suggestion for how these skills could be made available to local authorities is included under our response to the National, Regional and Local Approach, under “Local Task Force”.

Town Centres & Housing/Employment

- The document recognises that town centres will be under additional pressure in the future. Not only will they have to continue to operate in a difficult economic climate, they will also face growing competition from internet shopping and out-of-town retail and leisure offers. However, in our observation, whilst many towns are now trying to put in place strategies to deal with this, much of the work that has been observed to date is unlikely to result in real, sustainable change or resilience.
- Housing - The approach to housing growth and delivery has not, to date, been adequately considered in relation to town centre regeneration. The Framework refers to the need for everyone to have access to good housing, and touches on its importance to the delivery of regeneration, but the processes are not generally dealt with in a holistic or joined-up manner. It is agreed that the location, nature and amount of housing is critically important for ensuring that all people have access to good quality housing. However, the delivery of housing can also be fundamentally important to the success (or failure) of towns and town centres. The decisions for the locations of new housing should be partly influenced by the needs of principal town centres: where it is essential that local services and facilities are maintained. The injection of additional (and economically active) population could be critical for success. This should be a key consideration in respect of strategic planning for housing growth/delivery, for town centre regeneration strategies and for the prioritisation of town centres and funding.
- We are concerned that not enough has been done in the past, in a proactive or creative manner, to unlock or create new housing opportunities in and close to town centres. The approach to housing delivery has largely been reactive rather than proactive. Failure to identify and prioritise the most beneficial locations for housing (to boost the population and therefore the vibrancy and vitality of town centres, and to re-use brownfield sites) has resulted in additional (and sometimes avoidable) pressure on greenfield sites and a lack of assistance for vulnerable town centres.

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- Employment and jobs – Similar issues exist as for housing delivery. Although there has probably been more proactive work undertaken in trying to attract jobs to priority areas, there has not been enough work done to identify or assess the impact of the loss of small scale employment in town centres. Again, where this is a priority for the vitality of town centres, not enough proactive work has been done to explore and create deliverable opportunities.

2. Feedback on National Outcomes & Principles

- The definitions and objectives are sound, they say the right things and most people would agree with them. But most recent regeneration strategies have sound objectives – there is a good shared understanding and agreement of what we should be seeking to achieve, and what would constitute success. The difficulty is usually how to convert objectives into delivery. This is where help is required and should be focussed.
- We agree with the need for ‘integrated activities’ and ‘a holistic approach’, but this has often been a weakness in the past. Again, all would agree with this objective, but it is difficult to achieve in reality, and unless it is skilfully brokered and managed attempts to achieve this objective can become counter-productive: complicating and delaying the process. This objective requires guidance and strategic skills.
- It is agreed that ‘intervention needs to be focussed and prioritised’, but this can only be achieved if there is full knowledge and information about root problems, causes, realistic potential, the relative costs/benefits of all options, the opportunity for added-value, value uplift, spin-off etc. This information is required at a local level (so that interventions within areas can be prioritised) but also at a strategic level (so that areas can be prioritised against each other). In order to allow this ‘smart’ prioritisation there is a need for consistency in the level and nature of information that is available. At the moment there is inconsistency, both in the nature of the information and the stage of the work. This needs to be addressed if this objective is to be meaningful.
- It is agreed that we need to ‘tackle barriers to growth’ and ‘unlock potential’, but this can only be achieved by fully understanding commercial, private sector delivery issues and requirements. This will only be possible if the private sector is fully engaged, in a collaborative way, throughout the whole process. In the past, many local authorities have found this working partnership with the private sector very difficult. This objective is only realistic if it is supported by skills and guidance.
- It is agreed that ‘all people in Wales should live in vibrant, viable and sustainable communities’, but we would question whether it is realistic for all communities to have their own ‘strong local economies’ and ‘economic growth’. In a difficult economic climate this will come back to the need for prioritisation. It may not be possible to sustain all towns beyond sustained communities (with enough services and facilities to simply maintain the community). Economic growth should be focussed on key areas, where this will generate greatest benefit. The objective needs to reflect this, otherwise it could be unrealistic and undeliverable.

In order for prioritisation to take place there will first need to be thorough understanding of the roles, socio-economic potential, commercial potential and importance of each area relative to others.

3. Feedback on Achieving Greater Coherence & Cross-Cutting Action

- It is agreed that 'coherence', cross-cutting action' and 'partnership' are critical for regeneration delivery. In our experience these approaches within the public sector, and between the public sector and the third sector have improved significantly over the last few years. The benefits and needs going forward appear to be well covered in the Framework and its objectives.
- However, as referred to previously, the approach between the public/third sectors and the private sector is much less developed or successful and this requires direct action.
- Within para 6.1.i, the document recognises the need to stimulate private sector investment, and for the private sector to achieve a reasonable return on their investment. It also identifies the way in which the private sector can create improved opportunities by providing expertise, skills, investment, jobs and innovation. However, the document does not say how we are going to form the partnerships with the private sector, in order to achieve the collaboration and working relationships that will be critical to inform the process and ensure private sector delivery. It is very unlikely that these partnerships will emerge unless they are brokered and managed, by skilled and experienced personnel.
- Furthermore, the document indicates actions that will be taken by the public/third sectors in order to stimulate and unlock private sector investment. However, it is not clear whether the private sector has been involved in defining these pre-requisites to investment, so it is not possible to say whether these are appropriate, relevant or comprehensive. In some case, the pre-requisites will need to be specific and unique. The approach should allow flexibility of response and decisions about unlocking interventions must be based on full information and collaboration with the private sector.
- It is essential that skills and expertise in private sector regeneration and delivery are engaged throughout the process, from the very outset. Commerciality needs to inform all approaches, and there must be a collaborative and partnership approach to all stages: especially before problems/objectives are established or briefs written. This issue requires direct action: guidance, exemplar model etc.

4. Feedback on the National, Regional and Local Approach

Local basis:

- It is agreed that the regeneration process must be proactive (rather than simply reactive): actively creating opportunities, identifying interventions and setting out priorities for investment. However, this will require two key things:
 - The full engagement of people with delivery skills, in particular expertise in private sector commerciality and delivery, in

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- identifying, assessing and prioritising options and essential pre-requisites
 - Strategic and local evidence, data, analysis and potential need to be consistent and available for all areas, so that all options can be explored, and decisions taken in full context.
 - The strategic approach to regeneration planning and prioritisation has not, in our opinion, been adequately addressed in the past. In many cases (especially town centre studies) areas are largely considered in isolation. Each seeks to maximise their own potential without consideration of the impact (or appropriateness of the impact) on other areas. Because of this, areas and towns (in particular) are often competing against each other for the same resources and activity. Relative roles and priorities need to be far better researched, determined and identified. There needs to be absolute clarity and robust priorities. It is unlikely that this will happen without intervention and guidance, and the document needs to address this.
 - It is agreed that local authorities are well placed and successful in orchestrating local public/third sector partnerships. However, they do not generally have a good track record in creating meaningful and collaborative relationships with the private sector (land owners, investors, occupiers, agents, consultants, developers etc). These partnerships will not happen by themselves, they have to be brokered and managed by people who understand all processes, complexities, relationships, sensitivities, requirements etc. Putting in place the means to create these partnerships must be a key objective of the New Regeneration Framework – it is currently not adequately addressed in the Consultation Document.
 - The availability and role of the Regional Regeneration Teams is supported (see below), and we would suggest that similar assistance needs to be available at the local level, through a Local Task Force. This could:
 - provide essential expertise to local authorities (or Town Teams), to plug the gaps and supplement skills available within the local authority, as required
 - bring together the full range of skills and expertise from all sectors
 - broker relationships
 - provide the necessary expertise of commerciality and private sector regeneration processes and delivery
 - be a 'roaming' task force that would work with a local authority and all other players in a focussed and concentrated manner until there is a robust regeneration strategy in place, and following this be available on an 'as and when' basis to provide on-going guidance and input
 - ensure a 'smart' approach to identifying strategic objectives, briefing and engaging consultants to prepare informed and realistic regeneration plans and strategies
 - Increase effectiveness and efficiency – reducing time and costs

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- ensure consistency of approach and information between areas, and co-ordinate timeframes
 - ensure each local area has a robust and sound evidence base and set of objectives that can feed into and facilitate a 'smart', strategic and regional approach to regeneration.

Regional Basis:

- It is agreed that a regional (and a sub-regional) approach is also essential, for the reasons stated in the consultation document.
- It is also essential that this approach is carefully managed, otherwise it could result in delays in planning, decision making and delivery at the local level. To this end, the role of the Regeneration Teams is very much supported.
- These regional teams could work with a Local Task Force (see above) to ensure continuity and consistency.

National Basis:

- It is essential, in our opinion, that the national approach is informed by commerciality and the needs of private sector investors, developers and occupiers.
- Decisions regarding priorities for public sector intervention and funding must be based on the full cost benefit analysis of options. This must include the extent to which public sector assistance can unlock or facilitate private sector delivery and investment, and the possibility for wider benefits and spin-off. This will only be possible if analysis is comprehensive and robust and has been undertaken with the involvement and input of the private sector delivery bodies.
- The role, importance and mechanisms for working collaboratively with the private sector, at all levels are inadequately addressed in the proposed framework.
- 'Evidence based' (para 6.3.i) – It is agreed that a robust evidence base is required, and a sound understanding of the needs and opportunities of each area. However, in our opinion, the evidence base is often too limited. Research and analysis is usually sound in respect of socio-economic circumstances and indicators of decline (vacancy rates and footfall), but often weak in terms of identification of under-lying, strategic problems and the reasons why these problems exist and have not been addressed to date. There is also usually very little interrogation of existing circumstances, to establish how areas are actually performing compared to how they could be expected to perform (relative to bench-marking areas), or what would need to be done to change the circumstances. In our opinion there needs to be more consistency and thoroughness in the preparation of evidence bases.
- The incompleteness of evidence and intelligence (combined with a lack of commerciality) often, in our opinion, leads to flawed Visions and regeneration plans for town centres and seaside towns.

Place Based:

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- It is agreed that a place-based approach is sound, but it is essential that consideration of the physical environment is not only linked to social regeneration but also economic and commercial factors and needs. This will help to prioritise and evaluate the benefits of investing in the public realm (compared to other options).
 - The document (para 6.3.iii) lists characteristics of persistent deprivation. Some of these are symptoms rather than the over-arching problems – some of the important problems are missing from the list. In our opinion there needs to be a better understanding of the issues that lead to degeneration and deprivation and the symptoms of decline. Unless this is addressed better than it has been in the past, we are unlikely to achieve anything more than superficial and unsustainable regeneration.

Governance Structure:

- It is suggested that more support and governance is required at the local level. See under Local Basis (4 above).

5. Feedback on Priorities for Funding

- It is agreed that funding must be prioritised.
- However, in order to prioritise appropriately, so that maximum benefit and private sector investment are achieved, there will need to be thorough research, analysis, full options identification/analysis/evaluation. Very often, in our observation, there is inadequate work done to identify exactly what could be done to create better conditions for private sector investment and funding, thereby reducing the need for public sector resources.
- Public funding often fails to effectively pump-prime private sector delivery. Gap funding should not normally be used unless it is working towards allowing and facilitating the private sector to take over – it should be helping to improve the delivery context rather than simply delivering projects.
- Towns/areas need to be prioritised for funding and intervention. Whilst this already happens to some degree, especially in Regeneration Areas, there is currently a lack of clarity around which towns are priorities, for what particular types of intervention and why. There is usually a required sequence to delivery and the solving of problems, and this needs to drive priorities for funding. This more sophisticated approach to prioritisation relies on thorough, consistent and strategic knowledge, analysis and planning.
- Solutions for unlocking and maximising the benefit/role of private sector funding need to be creative and 'smart'. This requires skill, experience and creativity, in all aspects of design and delivery. These skills are not common place, especially in the public sector. It is essential that all local authorities have access to the necessary skills. The mechanisms for this need to be considered and addressed by the New Regeneration Framework.

Design & Criteria:

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- The evaluation criteria (listed in para 6.5.ii) should include specific reference to commerciality/economic viability/deliverability.

6. Feedback on monitoring and evaluation
No comments

138. Pick Everard Wales View

Welsh Government – Consultation Document – Vibrant & Viable Places
New Generation Framework. 22nd October 2012.

In general this is a very well thought out and presented report which covers most matters and demonstrates a good understanding as to the surrounding issues.

By way of a response we set out the following thoughts (order as following the document rather than by any importance) by way of generic observations, and where relevant have tried to link with page numbers or relevant paragraphs.

1. This consultation does an extremely good job of referring to a plethora of previous reports/ systems / groups and toolkits – accepting that all of these are valid, that we want to capture “best practice” and be “up to date” however we are only a small country and we have a chance to streamline and reduce paperwork especially when so often this can detract from the goals and in many instances provides conflicting advice. Private sector is often left trying to interpret as best possible while public sector get caught up in trying to find a clear path that is fully auditable and often delivers the impossible – and as a result we miss opportunities and under deliver. Whatever way we go can it please be simple and “fleet of foot”.
2. Page 4 Para 3.1 – not true that opportunities are not forthcoming – rather it more difficult to get traction as the public sector have yet to realise that the landscape has significantly changed and thus a reluctance to look at things differently combined with regulations and bureaucracy that is not yet flexing.
3. Page 4 &5 – Para 3.2 supports a view that we are trying to bring together too may sources and groups – many of which can even have mutually exclusive requirements & goals. Be great if as this report suggests we might get one body offering clear guidance and governance.
4. Pages 6,7 &8 – these pages continues the theme about simplification and clarity — apart from National and Regional Governments we have 22 local authorities each of which have different departments and even internally do not always have the same drivers and operating procedures. This report obviously understands this and any steps to simplify are greatly welcomed however these few pages themselves set out Para 3.3 identifies three emerging policies along with a new round of structural funds – Para 3.4 Seven regeneration areas, with overlying comments around enterprise zones and business districts. Wales is not

a big country this report clearly understands the issues , yes we need to protect and support the huge variety of aims and goals however remains that Wales is not that big – so while it is welcomed that this report has a goal of bringing things together it remains in the text that we still seem intent on splitting up both geographically / nature of interests/ and levels of governance to a point that they must be better managed moving forward if we are not to become difficult to engage and do business with.

5. Page 8 – Investment in Merthyr Tydfil – Have some experiences of this and the headline of investment and the variety projects are welcome , however there are good and bad with all such things and suggest that those involved in not only this report but in taking this agenda forward could do very well to do some grass roots consultations :-
 - a. What do the schools / pupils / governors and teachers really feel that the New Merthyr College is doing?
 - b. The recent LHB consultations and the discussions around closure of St. Tydfil’s should be explored with the third sector especially to give an alternate view to the investment at Prince Charles or the creation of the new health park, as a lot of local justifiable concerns at the relocation of core services without a viable transport network.
 - c. The redevelopment of the old town hall has the potential to be a tremendous project, and to set a benchmark and really deliver - however if those interested consulted further it would be good to understand that this has been moved forward by the drive and determination of some local individuals. There were a lot of barriers that if learned from could be a benefit to future endeavours , and in many ways the support and interest that has been forthcoming has tended to be now coming from those who were not so keen to be involved in the early stages when support was required.
 - d. Reviews of other activities in the area such as the effects of Tesco’s locating adjacent to the town centre (and the unfortunate side effects of the “temporary “ car park, a discussion with actual sports clubs as to the benefits of the Rydykar complex including the loss of good quality sports pitches that don’t flood (and the costs of utilising the new facility being a barrier to events) and a look at plans and consultations for Riverside, Heartlands, Cyfarthfa castle, and the retail park expansion could give some really relevant insights if carried out properly.
6. Page 9 – fully agree with the statements – especially about lack of involvement of the public sector in planning and strategy, and that both the timing and mechanism for allocating and release of funding needs a lot of examination and improvement.

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7. Page 11 – fully agree that joining up thinking is Key – and that we must try and develop an easy and concise set of common guidance from a high level.
 8. Page 11 – section 4.3.i – Agree and would emphasise that engagement with the third sector is lacking and a huge opportunity for private sector is not being fully exploited as seen as just too difficult due to perceived and actual barriers in engagement.
 9. Page 11 – section 4.3.i – As a Business we would agree that both the infrastructure and broadband completely undermines our ability to do business, and would welcome anything that might improve as we are a bit of a laughing stock compared to other regions.
 10. Page 11 – section 4.3.i – As a Business we are already involved with engagement with schools and post 16 learning and would welcome any opportunities for further engagement.
 11. Page 12 – section 4.3.ii – Our business is already trying to stimulate and get involved in discussions around the goal of good housing which is affordable and provides tenure of choice – and welcome any opportunities to be involved as this is going to be very tricky in finding ways to overcome what could be fairly high barriers especially in relation to other areas of the UK where things appear to be easier.
 12. Page 12 - We would like to put forward another national outcome or principle as “Make Wales a place that is recognised as being both attractive and easier to do business where people also want to live and work”
 13. Page 13 – 5.1i – our early experiences are that innovative approaches are not being recognised – mainly due to the public sector favouring the tried and tested and being risk averse – and this in turn being probably being from a back drop of fear for jobs and leaving open to challenges / freedom of information etc. maybe stagnation due to trying to do the right thing.
 14. Page 13 Para 5.1.ii – While we fully endorse taking opportunities to advance equality and inclusion and improvement of employment practices – maybe temper by not taking “every” just the most appropriate and make sure that good procurement practice that delivers the best outcome does not become undermined by trying to do too much for too many.
 15. Page 14 – Para 5.2.iii – As a business we are committed to sustainable development and welcome the Welsh Government in making it central to the poverty agenda however we have a major concern that the agenda is being hijacked and influenced with the public sector being fed poor information resulting in programs and efforts that do not do what they say and the subsequent reports do not capture the actual feedback and lessons from those who should be heard – we would welcome a

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- chance to discuss Arbed, External wall insulation , solar panels as a case in point, and a chance to look at where the balance of a sustainable and viable project should best sit.
16. Page 14 – Para 5.2.iii – fully agree that evidence based not political drivers must be the lead consideration, yet much of what we are currently involved with is exactly that.
 17. Page 14 – Para 5.2.iii – our recent experiences are precisely that public sector is creating substantial barriers to investment and delivery by the private sector.
 18. Para 14 = Para 5.2.iii – while great that looking at long term programs and longer cycles and moves away from short term political horizons is exactly what we need – please make sure that this is tempered with a need for immediate action – the public sector can take an age to get even simple projects off the ground so resource and support must be available if these longer term endeavours are to be brought forward quickly.
 19. Page 15 – Para 6.1i – Fully endorse and this report has it precisely correct about private sector needs – so why is our evidence as a company trying to build a presence in Wales of poor practice, exclusion, and so many aspects of exactly what this report is so strongly advocating we must avoid.
 20. Page 15 – Para 6.1i – We are trying to get involved in many ways to find methods to tackle difficult sites and bring forward good quality regeneration – we have even offered some free consultancy – yet are struggling to make a great deal of headway in Wales and our regional office is now seeing other regions taking up opportunities that Wales have been offered.
 21. Page 15 Para 6.1.i – We especially agree that procurement expertise that can benefit communities and regeneration is both essential is desperately needed – however our recent efforts and evidence is that despite recent reports from Value Wales about training and improvement, and our own contribution to the SQuID consultation process, that this remains sadly lacking and is now a real and increasing barrier to being able to do business in Wales.
 22. Page 16 Para 6.1.i – Our company is very committed to reducing our carbon footprint however as set out previously afraid that when compared to other parts of the UK our transport system is both lacking and continues to get worse – we need improvements now as we are already struggling to compete and recruit – the Severn crossing / and M4 corridor is a real barrier and connectivity between the valleys is shocking.
 23. Page 16 Para 6.1.ii – As a company who engages with and has much involvement with the third sector we strongly agree that there is a huge

opportunity for engagement, however it is not helpful when often it is the public sector themselves that actually introduces such caution, bureaucracy and barriers to these relationships to such a point that it undermines rather than facilitates such interactions.

24. Page 16 Para 6.1.ii – As we have stated before we strongly welcome any efforts to address the needs of disadvantaged and excluded groups, however, as a private company we have suffered frustrations emanating from extremely well minded people who , not only go the extra mile for inclusion, but perhaps get a little lost as to the core aims and benefits and sometimes delay / undermine and even prevent opportunities, as a result of trying to deliver what is sometimes just too much , and maybe not recognising that some groups are just very difficult to get engagement with. As we move forward we must introduce a sense check and be realistic as to what, how much and how far we can go while retaining viability and timescale.
25. Page 17 – Para 6.1.iii – We fully agree that Public sector is the probably the key partner however to maximise the opportunities with the private sector they must become a little more comfortable with concepts such as “trust” and “risk”. There is seemingly a fixation on reports this paragraph itself refers to both the “Simpson” and “compact for change “ reports (we could easily employ full time people just considering / responding / looking at white papers / consultations / latest reports / guidance and best practice and too some extent we are almost forced to do this just to remain current) – yes we need to be aware of best practice and latest thinking however our experiences in Wales is currently that we are spending too much time in the strategy and we must quickly now move into a delivery phase before it is too late and others have capitalised on the best opportunities. We would also advocate that we find some way to make the public sector more accountable – a lot of good people are working tirelessly with diminishing resources and delivering way beyond what is reasonable yet others continue to demonstrate appalling practices which even in the seldom cases are reported very little is done or the facts are manipulated – If those spent even a short time with business it would not take long to establish where good and bad currently lie.
26. Page 18 – We fully support targeted recruitment and training however like other areas of our response, this must be properly monitored and controlled as to what can be reasonably expected as there are some elements where it is becoming a monster that not only can create a barrier to the very people it is supposed to help but even worse does not deliver on the core goals. We have been involved with discussions where people are engaged on a project by project basis so only attain half the skills they need before termination or worse still companies are releasing long term employees to make room for the recruits – We also wonder why hard hit industries like construction are the target for the majority of these initiatives while perhaps the financial sectors are not expected to competitively tender for public sector work with the same

expectations. Again mechanisms for gathering proper intelligence and feedback are required along with accountability for bad practice, for example we have noted recently a large increase in public sector tenders where the finance is again becoming a decisive factor and even the words “community benefits do not apply to this opportunity “, which is a frustrating change of direction when you have made commitments and business planning.

27. Page 18 – Heritage is key given the opportunities in Wales however again those involved must make a greater effort to be aware of the issues – Last week we were discussing this very matter with Cadw who fully understood our position on skills and evidence based tendering however many more in the public sector really struggle. In addition a clear and improved understanding of the underlying principles associated with these works must be obtained if we are not to carry out the wrong works (such as wall insulation) and make matters worse - we would be happy to share a couple of our recent tendering experiences where we have not only witnessed some bad practice but worse still we have kept an eye on the project and witnessed not only scope change (making it a completely different to what was tendered) but the consultation itself which was core and yet has been almost non-existent.

28. Page 19 – Planning – This paragraph itself sets out many of the current proposals / reports and changes - like other areas of our response we would ask for a balance between the needs for control with a sense check – how many bits of legislation and reports do we really need – how will changes specific to Wales interface with the private sector outside Wales – and how many times will we re-invent the wheel – not that long ago we were involved in extensive consultations about the “Wales Spatial Plan” which was going to bring a lot together in a not dissimilar manner (recall at that time the proposed transport hubs etc.) to what now appears to be proposed by the “Wales Infrastructure Investment Plan” but without the financial teeth.

- a. Would it be possible to introduce a period of stability to allow businesses to come to terms with the current positions and adapt?
- b. What steps will be taken to ensure that the devolved building regulations in whatever format they take seamlessly fit
- c. Who is going to have the overarching responsibility to see that this very consultation fits with the likes of the sustainable development bill?
- d. Who is going to bring together all the various departments and bodies be it Cadw, Carbon Trust, DECC, not to mention the Welsh Governments own departments?

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29. Page 19 – Transport – we have mentioned in some of our previous responses however Prices / Frequency / Safety are all still falling short of the mark in Wales - our experiences are that these are undermining our business in Wales and on a personal front we can provide examples of actual impact on young people’s educational and sporting opportunities.
30. Page 20 – Education and Skills – please involve schools and educational practitioners and do not lose current good practice in the name of progress and reform. Merthyr College and the re-organisation of sixth forms in general have been the subject of debates however those involved in the compilation of this report may well benefit from speaking with the teachers / parents and pupils that will be impacted by these sort of decisions and even in speaking with the local authority now that the ramifications of them handing over responsibilities to what is effectively a private organisation are starting to be properly appreciated in terms of abilities to influence in matters such as recruitment and staffing.
31. Paged 21 – environment – again we welcome and endorse this section with our response again relating to the documentation and numbers of initiatives - just in this paragraph we refer to “the rural development plan” , “the tidy towns initiative” , and that Welsh Government is now working with the new “Natural resources Body” to introduce a new “framework for the valleys” utilising the “new ecosystems approach” - This will undoubtedly bring some valuable new thinking but please can those involved be aware of all the other things that are going on with a view providing a – clear , succinct , and joined up approach that reduces the burden on business and offers us some stability to react / plan and actually deliver. We would note that we recently attend a consultation by DECC on the RHI and were perhaps not that surprised that there appeared to be some differing drivers and goals emerging.
32. Page 22 – NHs – we are fully supportive of the position that the NHS in Wales is a key player – we have been involved in frameworks and worked closely with them however would comment that this is a very good example where quite often the drivers are political , we ourselves have experienced disruption to business emanating from a lack of consistency in approach from Governmental departments and would most certainly advocate anything that can be done to assist the alignment of services and provision to actual needs of the community.
33. Page 22 – we have a great deal of experience in both the provision, procurement and assistance of securing community benefits in procurement – we would refer to our previous comments around TRT / consultation/ and engagement and welcome any opportunities to contribute to the discussion, as unfortunately we have both suffered from and witnessed some extremely poor practices. We contributed to the Value Wales consultations on SQuID and some of what we suggested might be a problem is now manifesting itself. We appear to

be overcomplicating things – Value Wales recent reports about training and increasing capability in procurement is not in evidence and as Business we are finding it increasingly more difficult and expensive to secure work in Wales via the tendering process with frameworks being both a blessing if you are on them and a curse if you miss out. Perhaps the greatest frustration is that there is no body to highlight poor procurement practices (we have tried to report via Value Wales) and seemingly very little accountability.

34. Page 23 – Community Safety – the deployment of 500 community police is tremendous however please can these be deployed in appropriate places at appropriate times – while we have no evidence however it does appear that they are highly visible in say town centres during the day but less evident in potential hot spots after dark?
35. Page 23 – In terms as to what can be done to achieve greater coherence across departments we would advocate that fire officers and building control need to be brought together even more closely and we would ask that you make sure that the fire service are fully consulted and listened to in the current discussions around devolved building regs. We would also ask that Building control and planning officers be given time to attend seminars and events, train and really take up CPD and are given both the time and encouraged to engage with the private sector. With a few notable exceptions it appears to us that with the current cutbacks they are now understaffed and unable to do much more than react in what is often a timeframe that undermines program.
36. Page 23 – 6.2.i – we welcome the Local basis however following from above it is going to be essential and extremely difficult to make sure that local authorities are properly trained and encourages to engage – we do not see huge evidence of a lot of public sector personnel at grass roots who have the skills, experience, vision and time to be able to get past the red tape and bureaucracy – this is evidenced by the number of recent events and consultations where the public sector has hardly been represented due to time available and ability to even gain approval for the costs of the events – even more worrying when invited to what would be a CPD professional type event we are seeing a huge and quite unjustifiable increase in concerns around gifts and bribery.
37. Page 24 – We welcome efforts to pro-actively create opportunities however following from previous comments we see very little evidence of a pro-active stance from the majority of Local Authorities and we have the impression that increasingly they are struggling just to be able to carry out the “Day Job”.
38. Page 24 & 25 Para 6.2.ii – Regional Level - Earlier in our response we indicated a concern as to the size of Wales and the tendency to have lots of splits while simultaneously wanting to introduce joined up thinking. This section itself looks at regions (and even sub regions) again mentions other bodies such as “the Valleys Regional Park

program” and WLGA – We take a great deal of comfort in the statements that the regeneration teams within Homes and Places have the experiences and will be bringing together partners to make projects happen on the ground.

39. Page 26 – Para 6.2.iii – National Level - again while we support the vast majority of this report we remain concerned at the number of splits and the ability of a public sector that is significantly reducing resources to be able to bring and keep all the parties / policies and initiatives harnessed. This section itself is identifying the relationships with such as WIIP and the planning Bills.
40. Page 26 – Yes agree with the National / Regional and local approach however with the proviso that a clear governance structure with roles / responsibilities and contacts be published with a view to unravelling the mysteries of the public sector and directing business as to who they should be engaging with.
41. Page 27 – Para 6.3 & 6.3.i – we agree that a people and place based approach is key to tackling declining communities and that it is essential that models that clearly evidence investment achieves greatest impact are required. We would perhaps go further and ask that not only are examples of good practice highlighted but that as in the modern business world – targets and KPI’s are set along with a level of accountability and perhaps even penalties for underperformance are considered.
42. Page 28 – continuing from above this does introduce accountability however much as we are seeing in the Education sector maybe we could have support teams who could be parachuted into areas that either lacked the in house skills or were identified as underperforming.
43. Page 29 – while fully agree with the concepts of maximising the investments we would caution that these are indeed “over and above” the primary rationale for investment and it is very important to bear this in mind and introduce some checks and balances to make sure that these extra gains as valuable as they may be do not predominate and actually undermine this same core reason for the projects.
44. Page 29 & 30 Para 6.3.iii again noted that this makes mention of yet more studies – “the place based approach” emphasis on town centre and seaside, and the series of Cadw Studies, the multiple deprivation index, CREW’s regeneration toolkit and the “Vital and Vibrant town centres reports” – again we re-iterate that we are not short on studies and reports and that now is the time for action.
45. Page 30 – Governance structure – we have already highlighted this is our response and fully agree that a governance structure is essential.
46. Page 31 – Investment – While there are a lot of extremely good ideas in this section we are again make note of the references this time at

references to the Portas and the enterprise and business committee enquiry as evidence of yet more paperwork – we welcome the proposals around indicative funding allocations and the creation of regional boards however we must try and do something to accelerate the process – if business plans are 2013/14 it is very possible especially around the more major schemes that proposals will not be coming forward until 14/15 with approvals and release maybe in 15 /16 and this actual projects being delivered in 2017 which seems far too distant.

47. Page 32 – Again there are many extremely well thought out points made in this section however now mentioning Business Improvement Districts and Local Growth Zones – We must be very sure that mechanisms are put in place that will successfully weld all these various concepts together and that they harness not only the ERDF and ESF funding but that they maybe even bring together departments such as DESH and DEBT.
48. Page 32 – Arbed – we have had a fair bit of involvement in Phase 1 and have concerns that feedback and lessons learnt have not been fully captured. We also have some concerns around the technical / specifications and in workmanship and quality - would be happy to share these if felt of use.
49. Page 33 – funding options – This is a good list of just a few of the potential sources – the whole public sector funding regime is a minefield as to what is about – who controls etc. We have experiences of lots of people advising what is available however a real difference would be if there were more people helping with identifying the applicable criteria and fit and with the associated applications and business plans. Maybe a case for specific funding officers who really understand what about and how to access.
50. Page 33 – Para 6.5.ii – The treasury Green book is a valuable and often used tool – however it is yet another toolkits and the reference is that proposals are expected to “take account of”. We are already aware of WHE are using similar versions of a five case model and we are cognisant of the drive by the public sector towards the concepts of PRINCE 2. In earlier parts of this report several other toolkits have also been mentioned - What would be most useful if Wales was able to develop and maintain a standard and simple set of guidance / model / toolkit that we could be applied regularly by all departments and in most instances that we all could become familiar and expert with, maybe even finally giving those Welsh Companies the upper hand in knowledge and this an advantage in tendering.
51. Page 33 – Para 6.5.ii – Very useful criteria and the ideas of making sure investment drives behaviours and adds value is commendable however on the negative side it is sometimes a problem that schemes are planned in advance and often by those who have aspirational and

unrealistic views which over time become fixed or even part of local policy – this can then be further exacerbated by further expenditure on feasibility studies / cost plans and consultations without the necessary strategy or experience. We have some experiences that we could share and while we appreciate that the creation of the recent database is doing much to understand where the “stuck sites” are along with efforts to free up – we would ask if any work has been undertaken to establish as to why they are “stuck”.

52. Page 34 – Para 6.6.i - results and accountability – previously in our response we have fully agreed and endorsed the need for measures and accountability however in terms as to whether the approach set out will achieve this we are a little confused as to what precisely the approach will look like – This section introduces the RBA approach – earlier sections mentioned the Treasurer Green Book and advocated CREW etc. plus we are aware of such standards as five case models and PRINCE 2 methodology. What we would seek would be a clear and easy feedback / capture and report going to one body that are well trained to evaluate and take sensible resulting actions. As we stated earlier expect that a quick straw poll of business would fairly quickly identify who are good and who bad.

53. Page 35 – Next Steps – We would certainly be very happy to be involved in any further steps – and look forward to seeing the published policy in Feb. We would request that anything that could be done to accelerate the process I s explored as the construction industry in particular is in desperate need of assistance and a new framework / structure in 2014 / 15 seems a long way away at a time we need actions.

139. Welsh Language Board

See separate document

140. Purepages

See separate document

141. Carnegie

The Carnegie United Kingdom (UK) Trust welcomes the opportunity to respond to the consultation on the Vibrant & Viable Places New Regeneration Framework. The Trust works to improve the lives of people throughout the UK and Ireland, by influencing policy, and by changing lives through innovative practice and partnership work. The Carnegie UK Trust was established by Scots-American philanthropist Andrew Carnegie in 1913.

We have chosen only to respond to the questions where we have experience and relevant evidence. Further information on our work is available on our website www.carnegieuktrust.org.uk.

GENERAL COMMENTS

The Carnegie UK Trust supports the Welsh Government's proposals to move towards an outcomes-based approach to regeneration which we see as part of a wider movement towards understanding, measuring and improving the wellbeing of individuals and communities.

An outcomes based approach, of the kind proposed in the consultation paper, is a step forward towards considering the impact of policies on the wellbeing of people. This is particularly true of the 'whole government approach' as set out in the principles for regeneration in the consultation document. Taking a system-wide approach to the overall impact of government activity can encourage joined up working and help services consider their unintended impacts, as well as those that they proactively seek.

As the Welsh Government may be aware, the Scottish Government has moved towards an outcomes based system of performance management through the National Performance Framework (see <http://www.carnegieuktrust.org.uk/publications/2011/more-than-gdp--measuring-what-matters> More than GDP: Measuring What Matters, Carnegie UK Trust, 2011). We would recommend that the Welsh Government consider the experiences of Scotland in taking forward this agenda.

It is essential that an outcomes-based approach is used to influence policy development, in addition to its use as a tool for performance management. Our <http://carnegieuktrust.org.uk/publications/2012/shifting-the-dial--from-wellbeing-measures-to-policy> Shifting the Dial: From wellbeing measures to policy practice report (Carnegie UK Trust, 2012) looks at how we can ensure outcome measures are factored into the policymaking process, so that what we measure is what really matters. The report draws lessons from France, Virginia (USA), the City of Somerville (USA), the City of Guelph (Canada), Vital Signs Toronto (Canada) and the Canadian Index of Wellbeing. Our case study research shows that policymakers can use wellbeing measures as a way to monitor our overall progress and direction as a society. Our key findings are that moving towards wellbeing measures requires both leadership and a broad-base of support from communities and civil society organisations. The process of agreeing what outcomes are to be achieved, and reporting on progress requires a consultative approach bringing in views from outside government, not merely a technocratic approach to developing indicators.

CONSULTATION QUESTIONS

Q. Should other national outcomes or principles be considered?

A new outcome on engaged and empowered communities

The Carnegie UK Trust recommends that the Welsh Government consider an additional national outcome of Engaged and Empowered Communities, and

that this should be the first national outcome in order to support the Communities First programme and the Welsh Government's Programme for Government objectives. A national outcome of Engaged and Empowered communities would provide an opportunity for genuine involvement of the communities in which regeneration takes place, and the option for communities to manage or own their own assets.

Community engagement

The Trust believes that in order for regeneration strategies to improve wellbeing, communities and citizens must be actively engaged in the process and empowered to take part in the decision making process. Without this underpinning principle there is a risk that regeneration strategies will not be effective.

The Trust has a long history of supporting effective community engagement. Our experience in a number of areas, including public libraries, improving local environments, broadband deployment, children and youth participation and rural development, suggests that there are a number of key components to effective engagement:

- the community as a whole must be aware of the opportunity to participate and actively encouraged to do so. Our experience across a range of policy areas is that sustainable solutions to community problems are often community-led solutions.
- the community must be involved in defining what the problems and priorities for action are, as well as providing their views on options for delivering services.
- the organisation carrying out the engagement process must have the skills to engage effectively, and have a culture of valuing contributions from a range of stakeholders.
- the organisation carrying out the engagement must provide clear and publicly available information on their role and vision for the community.

Community control and ownership of assets

In seeking to deliver the outcome of Engaged and Empowered Communities, we would also encourage the Welsh Government to explore the option of community management and ownership of assets. Over the past 100 years we have been actively involved in community assets and empowerment, originally through grants for public libraries, playing fields and village halls, and more recently through support to the community land trust movement in Scotland and across the UK as a whole.

Unused and underused public assets can have a significant negative impact on communities, particularly where they are allowed to fall into disrepair.

Conversely, we have seen how community ownership of land and assets has transformed many communities, as demonstrated in

<http://www.carnegieuktrust.org.uk/changing-minds/people---place/impact-of-community-ownership-of-land-in-scotland>From the Low Tide of the

<http://www.carnegieuktrust.org.uk/changing-minds/people---place/impact-of-community-ownership-of-land-in-scotland>Sea to the Highest Mountain Top

(Island Book Trust/Carnegie UK Trust 2012). We strongly support opportunities for both urban and rural communities to take greater control and ownership of the assets in their locality, where they are interested in doing so.

We are currently advising the Scottish Government on similar proposals through membership of the Ministerial working group on the proposed Community Empowerment and Renewal Bill.

The benefits of community ownership or stewardship can be:

- financial: levering in finance from other sectors and other fund raising activities.
- economic: contributing to the regeneration of the local economy which will improve the value of local land and buildings.
- social: opportunities for participation, pride in the local environment and individual and community wellbeing.

Options for community ownership of assets include asset transfer from local authorities, long-term leasing, joint or co-operative ownership and gradual equity purchase. There is no 'one size fits all' approach to identifying the correct solution for community assets but all should be considered by the public authority and community groups.

In order to understand the assets in their area, local people need to be provided with the opportunity to explore these issues together. There are many techniques for facilitating discussions about local assets, including asset mapping, appreciative enquiry and community-led planning. To be effective, they must start with assessing the views of people in the community as to what they think the assets are. This can help communities to build greater confidence and a stronger political voice with which to engage with the political system.

However, taking over community assets must come from a desire from the community to do things differently, not pressure from public authorities to take responsibility for assets that they can no longer maintain effectively.

Additional Comments on existing outcomes

Outcome One: Prosperous Communities

The Carnegie UK Trust believes that Outcome One: Prosperous Communities is central to the Welsh Government's ambitions for regeneration. Below we have outlined the importance of this outcome, particularly with regards to broadband connections and successful town centres and seaside towns. For both of these outcomes, we draw on our experience and evidence to demonstrate the importance of these for realising prosperous communities and, in turn, regeneration.

Well-connected communities supported by transport and broadband connections

The Carnegie UK Trust particularly welcomes the inclusion of the outcome within this section relating to 'well-connected communities supported by transport and broadband connections' in order to achieve prosperity. Our <http://carnegieuktrust.org.uk/publications/2012/rural-broadband---reframing-the-debate> Rural Broadband – Reframing the Debate report (Carnegie UK Trust and the Plunkett Foundation, 2012) suggests that governments and markets alone are unlikely to be able meet the high aspirations of rural communities when it comes to the provision of superfast broadband. Rural communities themselves, particularly in remote rural areas where distances are greater and the population more dispersed, are likely to be required play a central role in achieving the services that they require. However, this does not mean that government should 'leave communities to get on with it', but should

support, encourage and empower communities to achieve the infrastructure that they need. With this in mind, we suggest that the Welsh Government should provide clear leadership on this issue, and have a robust strategy and commitment to provide long-term support for the development of community broadband solutions in rural areas, and ensure that this strategy encompasses the full range of support that community broadband enterprises are likely to need – including financial support, business advice, technical expertise and development support.

Successful town centres and seaside towns

The Carnegie UK Trust also welcomes the inclusion of the outcome relating to ‘successful town centres and seaside towns’ across Wales. In many towns and cities, a healthy high street mixture of retail, leisure, civic and service uses is under significant threat. The retail crisis is being fuelled in large part by the departure of large and medium sized businesses from the high street environment.

Whilst food and drink, health services and other non-retail provision are moving into vacant retail units left behind by national shop chains, high streets are unlikely to be re-energised by these alone. They will also need to harness the spirit of innovation generated by younger entrepreneurs, capable of commercialising innovation that will tempt their contemporaries – the new, young consumers – back to town centres in the years ahead.

The Carnegie UK Trust’s understanding of the economic environment suggests that there is a deficit in retail innovation on the high street but a surplus of innovation, energy and retail experience amongst younger people, many of whom are looking for real opportunities to experiment with small business ideas (<http://carnegieuktrust.org.uk/publications/2012/enterprising-minds---full-report> Enterprising Minds, Carnegie UK Trust, 2012).

In response to this research on youth enterprise and towns regeneration, the Carnegie UK Trust has developed

<http://www.carnegieuktrust.org.uk/changing-lives/testtown> TestTown (Carnegie UK Trust, 2013). TestTown is an innovation challenge and an opportunity for young people to make their mark. The purpose of TestTown is to inspire an enterprising mind-set in young people, civic and community organisations. Through TestTown, the Carnegie UK Trust wants to find the next generation of ideas that will help to rebuild our town centres as places to visit, shop in and live in. Teams of young people aged 16-25 from across the UK, from all kinds of education and employment backgrounds, will be invited to submit cutting edge new business and social enterprise ideas, and will have the chance to put their ideas into practice in one town centre environment as part of a challenge competition Finals Week in mid-2013. Competitors will receive mentoring, product design support, short courses in business and innovation, and access to project development funds and Finals prizes. The project will be publicly launched in early 2013 with the announcement of a host town.

Outcome Two: Learning Communities

The Carnegie UK Trust believes that regeneration is linked with the skills of individuals, families and communities and welcomes national Outcome Two: Learning Communities. In this section we address the outcome of ‘a skilled and confident existing and future workforce’ by drawing on our work with young people and their views on enterprise education and enterprising

opportunities for employment.

A skilled and confident existing and future workforce

In order to achieve the national outcome of Learning Communities, the Trust welcomes that regeneration policy will support 'a skilled and confident existing and future workforce' in Wales. Our recent research project

<http://www.carnegieuktrust.org.uk/publications/2012/enterprising-minds---full-report> Enterprising Minds (Carnegie UK Trust, 2012) explores the attitudes of young people to enterprise, education, and the future in a changing economy. It focuses on how students view practical enterprise – starting a business or working self-employed – and the contribution education systems make to the understanding of these work types.

The research found that college students in Wales rated more 'pro-enterprise' than their contemporaries anywhere else in the UK. They were more likely to see themselves starting businesses after college, were generally more confident that enterprise had been incorporated into their educational experiences, and were more inclined to admire and seek to follow the examples of enterprising people. Colleges in Wales are at the forefront of enterprise education, which comes through in the number of young people who told us they feel inspired to be successful entrepreneurs. The research shows that meeting successful business leaders and entrepreneurs from their own communities encourages and inspires students to think in more enterprising and creative ways – and that Welsh colleges have been particularly successful in providing this kind of support.

The Welsh Government should therefore capitalise on this entrepreneurial spirit among its young people and work with colleges and supporting organisations to create more opportunities to develop practical enterprise skills that build on their retail experience and extracurricular interests. This may include student-led projects, competitions, and opportunities to design retail ideas with industry experts.

Outcome Three: Healthier communities

The Carnegie UK Trust welcomes the inclusion of national Outcome Three: Healthier Communities in the Welsh Government's regeneration policy and its focus on the health, safety, sustainability and quality of communities. In the section below we outline the importance of a sustainable and quality local environment in particular for regenerating Wales.

The Carnegie UK Trust believes that in order to achieve national Outcome Three, healthier communities, a 'sustainable and quality local environment' is essential and therefore we are pleased that this is recognised within the outcomes in this section. Our experience from our

<http://carnegieuktrust.org.uk/publications/2012/pride-in-place--tackling-environmental-incivilitie> Pride

<http://carnegieuktrust.org.uk/publications/2012/pride-in-place--tackling-environmental-incivilitie> in Place: Tackling Environmental Incivilities research (Carnegie UK Trust, 2012) shows clearly the impact of the local environment on the wellbeing of individuals and communities. The report provides case studies of community-led projects from Belfast to Glasgow to tackle issues such as vandalism, graffiti and litter which have a disproportionate impact on

those living in the UK's least affluent communities.

Our research found that the community must be involved in defining what the problems and priorities for action are for their local environment, as well as providing their views on options for delivering services. Our experience shows clearly that local people may well have different priorities to those assumed by service providers.

The Trust therefore recommends that the Welsh Government supports local authorities to:

- increase the priority given to tackling environmental incivilities, particularly in deprived urban areas, given the impact these have on individual and community wellbeing.
- work in partnership with local communities to identify the main incivilities problems in their neighbourhood and think about how these might be overcome.
- provide information, advice and support to community led groups who want to tackle environmental incivilities in their area.
- provide small-scale funding to local community groups seeking to tackle the problems of incivilities in their area.
- seek to build into procurement processes obligations upon environmental contractors to either work with or provide financial support to local, community-led projects seeking to tackle incivilities in their area.

Q. What more can be done to achieve greater coherence and cross cutting action across departments?

Community outcomes, such as the ones identified by the Welsh Government are themselves cross-cutting and rely on the involvement of a large number of public services, and in many cases are also reliant on the voluntary sector. Agreeing joint outcomes, shared between departments can help overcome some of the difficulties but one of the key barriers to joined-up working is operating to different targets and indicators. Even where the outcome is agreed, departments may have different target priorities. Virginia Performs, the inspiration for Scotland Performs, pioneered the model of having shared, cross-departmental indicators. Combined with staff training and awareness raising activities this has helped public servants to see the value of their work as part of the whole. In Scotland, using single outcome agreements there are moves to joining up agreed outcomes and indicators between local public services but also in partnership with the third sector. While the Programme for Government includes a large number of indicators, we were unsure of whether these are viewed as shared indicators, as they are in Virginia. The Welsh Government should consider whether the outcomes approach could be supported by further work at the indicator level.

142. Ceredigion CBC

Ceredigion County Council welcomes the opportunity to respond to the Vibrant and Viable Places a New Regeneration Framework consultation document.

The Council agrees that it is timely and appropriate for a fundamental and wide-ranging review of the approach adopted by Welsh Government, because, as the consultation document recognises, regeneration is achieved through partnership and is ‘everyone’s concern’. It is perhaps regrettable that the policy review that was undertaken earlier, and although reported in the Preface to this document, was not itself taken forward through a fully transparent open public consultation exercise.

It is particularly helpful that the Framework acknowledges the wide basis of regeneration, set out in a definition based on economy, people and the environment and that the document seeks to present a whole government approach. The relevance of a ‘place-based’ approach to the Welsh Government’s “focus on people” and to achieving better outcomes through joining up working at all levels, national, regional and local is important.

The document emphasises the very wide policy scope – much wider than simply town centre renewal, or the commitment to this work set out in Chapter 9 of the ‘Programme for Government, Tackling Poverty’ that that will be needed to achieve successful and enduring regeneration outcomes.

Despite the lack of a specific commitment to ‘place’ in ‘Programme for Government’, this consultation highlights the need for regeneration and a place based approach to be adopted almost as a ‘cross cutting’ approach across all twelve policy areas but this New Regeneration Framework needs to highlight the special role of regeneration as the place focussed delivery of all aspects of Welsh Government’s Programme.

The Council welcomes the intention for the document to provide:

- New national outcomes;
- A well evidence and evaluated people and place based approach;
- A strengthened national, regional and local framework; and,
- A commitment from Welsh Government to work in an integrated way across departments and portfolios.

But the Council has concerns as to how these themes can be developed in a sustainable and enduring way. These concerns relate not only to how these themes are developed within the Framework but also that there remains considerable work to specify how this can be delivered successfully, locally, regionally and nationally.

The Framework lacks a critical examination of the rationale for interventions in town centres and seaside towns. Clarity is needed as to what is the intended outcome of the intervention and whether it can / has actually be/en achieved. In the current economic climate, additional town centre spend and additional growth / indicators are extremely difficult to achieve and evidence.

In the absence of growth, interventions seeking to regenerate one place will often displace spend and activities from other nearby centres. Such renewal activity does not grow the total spend / footfall / participation within the region or within Wales and may represent poor value for public money. The commitment to work on this agenda regionally and nationally does little to explain a whole Wales approach to evidence real growth and value achieved rather than simply fuelling competition and displacement. To achieve better overall outcomes in the current climate, consideration needs to be given to

reducing or restructuring centres to create real opportunities for growth and public sector support.

An alternative approach would be to focus Welsh Government actions more sharply on achieving significant additional growth in wealth and jobs across Wales so as to create real opportunities for town centre development. The document does not evidence evaluation of any alternative approaches. Although throughout the document Welsh Government programmes are referenced and highlighted as relevant to regeneration, the document overall fails to map the close relationships existing and needed between all programmes to progress successful regeneration and achieve worthwhile outcomes. In the 'Context' chapter, the lack of a single coherent National approach is apparent. The document responds to the current lack of a National and or regional framework and sets out arrangements that go only part way to addressing this. It is noted that the summary of the findings of the independent evaluations of the current activity fails to acknowledge this. The findings of the independent evaluation are just that and seek to explore the current approach rather than a rather more broadly based evaluation of how the current approach meets the needs and achieves the outcomes required to deliver regeneration across Wales.

There is insufficient attention given to:

- Clarity of outcomes; the summary of current activity highlights for the most part expenditure sums; not achievement of real regeneration outcomes that make a difference.
- The achievement of real regeneration outcomes nationally; the approach will fail if it is too targeted.

The commitment to Results Based Accountability™ is particularly welcomed in this regard as it will have the potential to address the above. However to fulfil this potential, RBA needs to be implemented throughout and form the basis of the Framework through outcomes, indicators and strategy as well as giving performance accountability.

The draft Framework does not provide an overarching review of any State aid issues arising, nor is there an analysis of the opportunity to notify the final Framework so as to streamline these considerations, simplify delivery and reduce local risks.

Despite the local and regional levels proposed and the strong public sector focus for much of this work with local authority leadership, there is no reference to the potential role of the local service boards. At page 27 there is a reference at regional level to an integrated Community Strategy. These documents owned by local service boards are now in the final stages of being replaced by Single Integrated Plans that come into being in April 2013. There are presently no arrangements to integrate these into three regional plans to cover the whole of Wales.

Despite the reference, in the 'Overview', to sustainable development as a central guiding principle, and, in section 5.2. on page 14, to sustainability, the theme is not developed in the document. Although sustainability is referred to as an evaluation criterion, there is no explanation of in what way it will be interpreted or how it will be evaluated.

Similarly, despite a number of references to rural issues and rural programmes the New Regeneration Framework described in Chapter 6 shows little evidence of an appreciation of the regeneration needs of rural areas. There can be little confidence that the Programme for Government commitment to rural proof Welsh Government strategy and policy at the formative stage has been followed through here either in this consultation document or in the policy review, that preceded it.

Question 1: What is your feedback on lessons learnt from delivery to date?

- Greater certainty is needed for future years; regeneration is a multi year task.
- Strict adherence to FY expenditure planning and the lack of flexibility is unhelpful and reduces the real regeneration outcomes of the programme as well as the opportunities for adding value to delivery through joining up activities from a range of funding sources.
- There is a lack of an all-Wales view; measuring progress not just locally but across the whole of Wales to evidence real outcomes nationally rather than local outcomes with the probability of poor or little achievement overall and the possibility therefore of criticism of the current programme as being deadweight.
- Local approaches should reflect a strategic approach both nationally and regionally.
- The current arrangements for local boards have worked and have been easy to operate as they do not need to address priorities or competition between areas as is implicit in a regional or national approach.
- Current arrangements highlight the continuing need for much greater 'buy-in' from the wider public sector and in particular a grasp of the wider regeneration impact of projects not "customarily" accepted as having substantial regeneration outcomes, for example, health services, or of the positive and negative regeneration outcomes of operational strategies. There are particularly exciting and innovative opportunities to harness much wider impacts and achieve more with heritage projects.

Question 2: Should other national outcomes or principles be considered?

- Support the principle of the three high level outcomes focussing on prosperity, learning and a healthier Wales but would observe;
 - A further high level outcome focussing on equalities should be added;
 - A final high level outcome of enduring (sustainable) results should also be added; and,
 - There should be no specific reference to 'communities' at this high Framework level. The apparent intention is to seek a prosperous Wales, a learning Wales, a healthy Wales, an equal Wales and a sustainable Wales by targeting places to achieve these overall outcomes for the whole of Wales as part of the 'Programme for Government'.
- There is a fundamental discontinuity in the development of the outcomes outlined in the draft Framework: The Framework as written

gives the appearance of precedence to the outcomes of the Communities First programme over the Programme for Government's objectives. The strategic national outcomes for the Regeneration Framework should be set above those for the Communities First programme. This Framework is intended to apply to the whole of Wales whereas the Communities First programme has now evolved into a programme for only part of Wales and has no relevance to most of Wales. This lack of correspondence raises important questions about the delivery of a regional approach and the proliferations of different regional groupings for different purposes.

Question 3: What more can be done to achieve greater coherence and cross cutting action across departments?

- Adoption of Results Based Accountability™ at all levels including and driven by the Ministerial Advisory Panel, to ensure that coherence and the role of all departments is built in at all stages and transparent and that the approach is not just adopted to account for the performance of individual investments.
- The Ministerial Advisory Panel's terms of reference should clearly include all departments and, as an organising principle, include an expectation of full engagement, endorsement and full active participation. There are many challenges and understandings needed here.
- Develop and share a Communication Strategy for internal WG departments and disseminate to external partners to ensure the delivery of a whole government approach.

Question 4: Do you agree with the national, regional and local approach set out?

- In general yes, there is a clear need for a strong national policy to oversee the approach and manage competition between areas in line with achieving real all-Wales growth. This national all-Wales overview is absent presently.
- Additionally there are key all Wales actions which only departments of Welsh Government can initiate. These might include business rate relief, planning policy and strategic planning of health services and investments. But there must be transparent checks and balances to ensure that local priorities are not lost when national priorities are decided.
- Similar and parallel comments and safeguards are needed to ensure that the benefits of regional collaboration are achieved and that there is transparency to ensure that local priorities are not lost when regional priorities are agreed
- Clarity and a consensus is needed on the use and meaning of 'regional' and 'local' across all departments of Government. Different regions are already coming to be used by Welsh Government in the delivery of different aspects of the Programme for Government. This is confusing and potentially duplicative of effort on the part of all stakeholders. Additionally some stakeholders equate local with local

authority area and see a need to replicate delivery at a 'community' level to give effect to the high level outcomes as drafted using 'communities' as part of each outcome.

- The south west and mid-Wales region is a vast area of Wales with marked contrasts in the issues facing both the urban and rural parts of the region. The Council is pleased to note that the Framework reflects the need for an all service approach to regeneration by local authorities. The impact of investment in care, schools and transport etc., all contribute to renewing our towns and communities. The areas of Welsh Government activity outlined in the previous section at 6.1.iv and v are equally areas of local authority activity or delivery. These thematic areas could have been used as examples for focussing interventions outlined on pages 31 and 32 of the document. This would evidence the much broader reach of regeneration, and a commitment to a whole government approach as well as acknowledging the range of issues facing urban and rural areas. The seven illustrations chosen on pages 31 and 32 are limited, focussing on the renewal of towns and failing to demonstrate a cross-departmental or whole government approach.
- Regeneration takes place at regional and local levels through collaborative working arrangements both between and within local authorities. The driver for economic development and regeneration is founded primarily directly or indirectly in the work of local government because of the wide range of functions and responsibilities. Crucially the central role of local government brings the significant advantage of democratic accountability. Where would such accountability and responsibility be built into the proposed regional level?
- There is no indication of which organisation would take the lead in establishing and setting up the regional boards. How would membership criteria be established (and balanced between the three regions of Wales)? How would the work of the boards be scrutinised? What would be and how would the governance arrangements and supporting secretarial services be established? In the SW and mid region how would 3 universities 5 FE colleges and 3 health boards be engaged and involved?
- Although not stated explicitly, there is an understanding that other sub-regional and or local boards could be set up as part of the overall Framework. Annex 4 gives a diagram of the three levels for the New Regeneration Framework, however, page 31 refers to Annex 4 as "the proposed governance framework". There is insufficient information and guidance provided in Annex 4 on governance arrangements, accountabilities and responsibilities.
- At each level, there should be clear and transparent accountability not just in arriving at decisions, recommendations and priorities but also in the selection and appointment processes for the groups undertaking these tasks.

Question 5: Do you have any comments on our proposals for how we will target and direct our funding?

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- The Framework proposes indicative funding allocations to be made to the three regions on a formula basis but that actual funding will be based upon business plans to be assessed by Welsh Government.
 - The proposed consolidation of targeted investment into specified investment streams may be challenging for the achievement of regeneration outcomes. The identified streams may not be the most appropriate for local regeneration issues or indeed the business case for the investment.
 - While some revenue funding is suggested to help produce the business case and evidence, there is a substantial cost in gathering all the evidence suggested in the document. It would be more cost effective to make use of existing regional and county level regeneration strategies and avoid duplication.
 - The commitment not to select places may be welcomed but the proposal “to set robust criteria for proposals and to facilitate their development through our regional teams” needs more explanation particularly the relationship with the ‘local’ level, the detail of exactly what is proposed and how Welsh Government will establish cross-departmental teams for the three regional areas to be able to deliver this.
 - Results Based Accountability™ is not clearly embedded in the selection and criteria for the evaluation of proposals. This will seriously undermine the benefit of the commitment to its use.
 - Achievement of local outcomes / local contribution is not included among the evaluation criteria.
 - There is a strong emphasis on using regeneration funding to draw down European funding at a regional level; but not all priorities will be eligible for European funding and large numbers of communities in each of all three regions are in ‘east Wales’ and therefore potentially eligible for less European funding as ‘more developed regions’.
 - The envisaged model for European funding seems to indicate the use of the innovative Integrated Territorial Investment approach outlined by the European Commission in its proposals for the post 2013 period. While it is encouraging to see this as an ambition, there are no formal arrangements yet in place and no obvious responsible entities at these regional levels. The statement that this will achieve ‘more effective alignment of match funding opportunities’ is not explained or evidenced.
 - The evaluation criteria introduce bias; proximity to Communities First clusters is suggested. The Communities First programme has now been targeted away from the substantial sub regions in Wales. WIMD to which CF is closely linked, is widely recognised as not adequately describing poverty and deprivation in rural areas because of low population levels and the insensitivity of Census output areas. These areas contain some of the most deprived communities and towns in Wales. The rural proofing commitment in ‘Programme for Government’ has yet to impact on these issues.

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- A key criterion should be the clear intention that interventions and investment must become self-sustaining and generate sufficient revenue either directly or by savings that will finance their maintenance and renewal in the future; that is they are a one-off operation (the one-time, last-time principle).
 - Page 34 refers to the opportunity to pilot these approaches in financial year 2013 – 2014, but in the absence of a regional infrastructure, how will these pilots be competed for equitably across all parts of Wales? When will Welsh Government 'set robust criteria' for this piloting? How will the pilot ensure that the approaches are on an all Wales basis and will they demonstrate 'rural proofing'?
 - Greater regard is needed for the role of the private sector in evaluating proposals; without certainty about their engagement and involvement, proposals will fail to fulfil the one-off operation (the "one time, last time" principle) aspiration and run grave risks of substantial distortions of market conditions across Wales for many town centre and other activities.

Question 6: We want to ensure effective monitoring and evaluation of regeneration activities, will the approach set out achieve this?

- The effective monitoring and evaluation of these activities will require a more fundamental approach. Already noted above is the need for clarity about the monitoring of activities at each level, local regional and national. There are no arrangements for monitoring or scrutiny, for example, of regional level activity. There is need for the transparency of all activities at all levels and for openness to public debate and media.
- The Results Based Accountability™ model is highly appropriate to being deployed to demonstrate accountability at all stages of the process outlined and at local, regional and national levels. It is perhaps not best deployed simply as a project performance management tool as is described on page 34.
- Effective monitoring and information on a comprehensive basis covering Wales as a whole, each of the three regions and locally would be helpful to demonstrate not just achievements but also compliance with State aid requirements.
- The approach set out, although referencing Results Based Accountability™ does not clearly set out the approach to be adopted. A number of initiatives and approaches are mentioned but there is no clear indication of how these could be used and integrated with RBA. Without such an indication there can be little confidence that how this will work or if it will be effective.

143. Tai Ceredigion

Tai Ceredigion Cyf response to the Welsh Government's Vibrant and Viable Places a New Regeneration Framework consultation document

Tai Ceredigion welcomes the opportunity to comment on the Welsh Government's proposed new Regeneration Framework consultation document, as an organisation that is actively involved in both the regeneration of Ceredigion County Council's former housing stock and the regeneration of Aberystwyth as our Chief Executive is a member of the Aberystwyth SRA Strategic Board.

Housing associations in Wales now provide over 130,000 homes and an independent report for 2011/12 shows that 1973 new affordable homes were built, more than a quarter of the 7,500 target set by Welsh Government earlier this year. As a sector we have demonstrated that we improve local communities on an economic, social and environmental basis. In 2011/12 Welsh Housing Associations spent £951million an increase of 16% from the previous year and almost 80% of that spend was retained in Wales.

Tai Ceredigion is spending £35m between December 2009 and April 2015 to bring Ceredigion County Council's former housing stock up to the Welsh Housing Quality Standard. We have already utilised over £1.5m of ARBED funding to deliver affordable warmth and sustainable heating systems in the most deprived and off mains gas areas of our county. We have also directly created over 50 new jobs since December 2009 including 18 apprenticeships, in addition to delivering substantial local employment and procurement opportunities to local SMEs by becoming a leading good practice demonstration site for the Welsh Government's i2i toolkit. Independent research has shown that for every direct job provided by Housing Associations in Wales, almost 2 other jobs were supported by the housing sector. In 2011/12 this amounted to 20,200 full time equivalents across Wales, a rise of 15% from the previous year.

In the light of the above facts it is therefore in the interest of both Tai Ceredigion and the wider housing sector in Wales that the new regeneration framework is fit for purpose.

We welcome the fact that the regeneration framework is aligning its national outcomes with

those of Communities First and the Welsh Government's, Programme for Government's objectives and strongly advocate the key principles of Partnership, Strategy and Sustainability that underpin the framework.

However as the framework stands we have some concerns, which we outline below in some general comments, and which are then followed by some specific points on each of the consultation paper's questions:

Profile of housing-led regeneration

Whilst reference has been made to the role of housing-led regeneration as part of joined up delivery, Tai Ceredigion believes that the regeneration framework has missed an opportunity to use the good practice of housing associations in Wales to demonstrate what can be achieved with limited resources when there is joined up action, built on strong local and national partnerships.

Throughout the last ten years the housing association sector in Wales has, through collaboration with Welsh government and other key partners been at the forefront of

adopting community benefits into contracts, adopting good procurement practice, launching Moneyline Cymru and the money advice service, investing in local SMEs and social enterprises, implementing energy efficiency programmes, and taking forward the health and housing agenda.

Lack of flexibility for bottom up solutions

There is concern that the proposed structure for the regeneration framework, particularly the regional boards, could duplicate work of other regional boards and could also duplicate work undertaken under other initiatives if it's not all considered under one Spatial plan for Wales.

Whilst Tai Ceredigion welcomes the national objectives and believe they are broad

enough to allow a large menu of initiatives, our concern lies in the proposal to establish regional boards with responsibility for developing regional and sub-regional strategic plans that have control of the regeneration budget. It is unclear how prescriptive the regional boards' planning, advice and intervention will be. We would seek assurance that the regional board structure is not one of command and control but one of nurturing and enabling local solutions, and thus allowing for innovation. We would like to see a strong bottom up approach as this reflects the activity of housing associations in Wales.

Regeneration of naturally Welsh speaking communities

In the light of the recent 2011 Census data, showing the decline in naturally Welsh speaking

communities, Tai Ceredigion is alarmed that there appears to be no reference at all to the Welsh language in this document. Creating local job opportunities, having the right policies in place, investing sustainably is key to ensuring that communities who have the added dimension of being naturally Welsh speaking are regenerated in a sustainable way.

Gwynedd County Council have announced that in the light of the census results creating viable, sustainable communities in those Welsh speaking strongholds is their priority and we would strongly suggest that the Minister reflects this in the final framework.

Question 1: What is your feedback on lessons learnt from delivery to date?

- Greater certainty is needed for future years; regeneration is a multi year task.
- Strict adherence to FY expenditure planning and the lack of flexibility is unhelpful and reduces the real regeneration outcomes of the programme as well as the opportunities for adding value to delivery through joining up activities from a range of funding sources.
- There is a lack of an all-Wales view; measuring progress not just locally but across the whole of Wales to evidence real outcomes nationally rather than local outcomes with the probability of poor or little achievement overall and the possibility therefore of criticism of the current programme as being deadweight.

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- Local approaches should reflect a strategic approach both nationally and regionally.
 - The current arrangements for local boards have worked and have been easy to operate as they do not need to address priorities or competition between areas as is implicit in a regional or national approach.

Question 2: Should other national outcomes or principles be considered?

- Tai Ceredigion supports the principle of the three high level outcomes focussing on prosperity, learning and a healthier Wales but would comment that there should be no specific reference to 'communities' at this high Framework level.
- In addition, there is a discontinuity in the development of the outcomes outlined in the draft Framework: The Framework gives the appearance of precedence to the outcomes of the Communities First programme over the Programme for Government's objectives. The strategic national outcomes for the Regeneration Framework should be set above those for the Communities First programme. This Framework is intended to apply to the whole of Wales, whereas the Communities First programme has now evolved into a programme for only part of Wales and has no relevance to most of Wales. This lack of correspondence raises important questions about the delivery of a regional approach and the proliferations of regional groupings for different purposes.

Question 3: What more can be done to achieve greater coherence and cross cutting action across departments?

- Adoption of Results Based Accountability™ at all levels including and driven by the Ministerial Advisory Panel.
- Develop and share a Communication Strategy for internal Welsh Government departments and disseminate to external partners to ensure the delivery of a whole government approach.

Question 4: Do you agree with the national, regional and local approach set out?

- Tai Ceredigion agrees that there is a clear need for a strong national policy to oversee the approach and manage competition between areas in line with achieving real all-Wales growth.
- Comments and safeguards are needed to ensure that the benefits of regional collaboration are achieved and that there is transparency to ensure that local priorities are not lost when regional priorities are agreed
- Clarity and a consensus is needed on the use and meaning of 'regional' and 'local' across all departments of Government. Different regions are already coming to be used by Welsh Government in the delivery of different aspects of the Programme for Government. This is confusing and potentially duplicative of effort on the part of all stakeholders.

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- The south west and mid-Wales region is a vast area of Wales with marked contrasts in the issues facing both the urban and rural parts of the region. Regeneration takes place at regional and local levels through collaborative working arrangements both between and within local authorities. There is no indication of which organisation would take the lead in establishing and setting up the regional boards. How would membership criteria be established (and balanced between the three regions of Wales)? How would the work of the boards be scrutinised? What would be and how would the governance arrangements and supporting secretarial services be established?
 - At each level, there should be clear and transparent accountability not just in arriving at decisions, recommendations and priorities but also in the selection and appointment processes for the groups undertaking these tasks.

Question 5: Do you have any comments on our proposals for how we will target and direct our funding?

- The Framework proposes indicative funding allocations to be made to the three regions on a formula basis but that actual funding will be based upon business plans to be assessed by Welsh Government.
- While some revenue funding is suggested to help produce the business case and evidence, there is a substantial cost in gathering all the evidence suggested in the document. It would be more cost effective to make use of existing regional and county level regeneration strategies and avoid duplication..
- There is a strong emphasis on using regeneration funding to draw down European funding at a regional level; but not all priorities will be eligible for European funding and large numbers of communities in each of all three regions are in 'east Wales' and therefore potentially eligible for less European funding as 'more developed regions'.
- The evaluation criteria introduce bias; since proximity to Communities First clusters is suggested. The Communities First programme has now been targeted away from the substantial sub regions in Wales. WIMD to which CF is closely linked, is widely recognised as not adequately describing poverty and deprivation in rural areas because of low population levels and the insensitivity of Census output areas. These areas contain some of the most deprived communities and towns in Wales. The rural proofing commitment in 'Programme for Government' has yet to impact on these issues.

Question 6: We want to ensure effective monitoring and evaluation of regeneration activities, will the approach set out achieve this?

- Tai Ceredigion believes that there is a need for clarity about the monitoring of activities at each level, local regional and national. There are no arrangements for monitoring or scrutiny, for example, of regional level activity. There is need for the transparency of all activities at all levels and for openness to public debate and media.

In conclusion, Tai Ceredigion, whilst supportive of the framework proposals believes that further clarification of the proposals and the criteria and monitoring arrangements is needed; particularly with respect to the proposed regional collaboration.

In its current format, we do not feel that the draft framework adequately recognises the contribution and strong track record in regeneration that housing associations in Wales have delivered for Welsh Government and local communities across Wales during the last ten years. In addition, there is no evidence of any "rural proofing" of the draft framework having been undertaken, and neither does it make any reference to the Welsh language and the importance of bilingualism in the regeneration and sustainability of healthy local communities in Wales.

There is evidence of strong partnership working between the Welsh Government, local government and housing associations across Wales and we would urge the Welsh Government to review the framework for regeneration in the light of the consultation responses received from their partners so that those delivery partnerships can deliver even more in the next five to ten years.

Steve Jones

Chief Executive, on behalf of Tai Ceredigion Cyf.

144. Planning Aid Wales

Planning Aid Wales

Response to Welsh Government consultation,

Vibrant and Viable Places: New Regeneration Framework

1. About Planning Aid Wales

1.1 Planning Aid Wales is an independent not-for-profit charity which is core funded by the Welsh Government. We work for a fairer and more transparent planning system which is responsive to community needs and preferences.

1.2 We provide information, advice and training services to enable communities to engage more effectively with the planning system. We also work with local planning authorities and the Welsh Government to encourage more and better community involvement in the planning process.

1.3 When responding to consultations on emerging national policy, we aim to identify and hopefully rectify potential policy barriers to effective public involvement in planning.

2. Consultation response

2.1 We strongly support the commitment to regeneration teams and Communities First cluster teams working together to facilitate improvements for local communities and the people living in them.

2.2 We also strongly support the commitment to genuine involvement of communities as a prerequisite for effective local regeneration. Involving local communities on the ground in developing regeneration policies and priorities

will help ensure that strategic regeneration objectives enjoy public support and confidence.

2.3 Planning Aid Wales can help to achieve the Framework's bottom-up aspirations by assisting local authorities with community engagement in a number of areas. These include community engagement during the preparation of Local Development Plans and Supplementary Planning Guidance covering local areas. We can also help to develop regeneration proposals which reflect the needs and preferences of local communities in deprived areas.

2.4 We do however have a small number of concerns about the consultation proposals. These are as follows:

- i. The new delivery framework sees local authorities as the main vehicle for co-ordinating economic development, regeneration activity and tackling deprivation at a local level through community planning. To realise the full potential of this local approach, we think Welsh Government guidance will be needed to interpret and articulate the national Framework principles of community involvement so that local authorities know what is expected to achieve genuinely people-based local regeneration initiatives. This is particularly important given the envisaged close working relationships between local regeneration teams and the emerging Communities First cluster arrangements.
- ii. Proposals for three regional boards may not be a good fit with emerging proposals for a new layer of regional land use planning in some parts of Wales.
- iii. Regeneration is vital for enhancing the health of the remaining Welsh Language speaking areas. Links need to be established between the national regeneration framework and the Welsh Language Strategy.
- iv. There is a danger of public confusion in using the term 'local plans' for both land use and regeneration purposes.