



Response to CLG consultation

Policy Statement on Regional Strategies and Guidance on the establishment of Leader's Boards.

Submitted: 30th October 2009

This is COVER's response to the consultation issued by CLG on the draft Policy Statement for the development of Regional Strategies, the proposed wording of the Town and Country Planning (Regional Strategy) Regulations 2010, and the guidance for Leader's Board schemes. COVER is a representative body for the Voluntary and Community Sector in the East of England. Our Vision is of a just and inclusive society for the region that recognises and supports the value, and values, of the community and voluntary sector. Our Mission is to increase voluntary and community sector regional influence, activity and recognition.

A draft version of this paper was circulated widely to our Board members, full and associate members and partners for their comment before submission. Some of our member organisations and networks may be responding separately.

This response groups together the questions posed by the consultation into five categories, according to the overlapping issues that we wish to raise: Priorities and content of regional strategies; Process of developing regional strategies; Additional documents; Draft regulations; and Leader's Boards. Each of these groups is addressed in a separate section below.

Any queries about this consultation response can be directed to:

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Priorities and content of regional strategies

COVER welcomes the approach set out in the policy statement, and broadly agrees with the content proposed for the regional strategies. However, we are concerned about the inconsistency throughout the document around the inclusion of the social agenda. In some clauses there is a clear requirement for regional strategies to include this vital element, but in others it is glaringly absent.

COVER feels strongly that the social agenda needs to be given a high priority in regional strategies. A commitment to economic, spatial and environmental sustainability is excellent, but is incomplete without the social element. The three pillars of sustainability are widely understood to be social, environmental and economic and we feel that this balance needs to be reflected throughout this policy statement.

Specifically, we feel that the document would benefit from amendments to the statements in the 'main principles' section, and the 'purpose and scope of regional strategies' section, as set out immediately below.

Main principles (2.1)

Point 4 does not add anything particularly new to Point 1, only expanding on it and rephrasing – the two points could potentially be combined. As well as mentioning economic and environmental coverage it is important that in this summary statement the social agenda is included: it sets the tone for the rest of the document.

Purpose and scope of regional strategies (3.1, 3.2, 3.3)

Point 3.1 mentions economic growth and sustainable development, but doesn't mention environmental and social objectives. Point 3.2 refers to social welfare but only in as much as it contributes to sustainable economic growth: social welfare is an issue to be addressed in its own right, not only for its economic implications.

Point 3.3 refers to guiding the activities of regional partners around sustainable economic growth, development and regeneration: again the environment and social agenda are not mentioned.

1.1 Do you consider that the scope of the Policy Statement enables regional flexibility while providing sufficient certainty and consistency about how new Regional Strategies should be prepared? Do you wish to suggest any improvements?

The policy statement provides clear guidance for regions developing their strategies. We would suggest however that a little more guidance about the format of strategies could be useful in order to ensure that all regions have roughly parallel documents.

The guidance refers to the need to develop a concise and easily accessible document (paragraph 3.4 point 6). Considering the current size of the RSS and the RES, let alone the numerous other strategies in existence, we wonder how feasible it will be to retain the detail necessary for these crucial documents at the same time as making them succinct enough to be useful.

1.2 Do you agree with the scope of Regional Strategies set out at Paragraph 3.4? Do you have any suggestions as to how this can be improved further?

Yes. Possibly it would be helpful to mention the balance between outlining strategy for all parts of the region with allowing local areas to develop their own detail.

A related issue is around the differing development cycles of local planning strategy and regional documents creating contradictions or misalignments. It would be useful to address this issue.

1.3 Do you agree with the sub-regional approach at Paragraph 3.6. If not, what do you think needs to be improved?

Yes. This allows regions flexibility to consider the best approach for their areas.

1.4 Is the policy framework at Paragraphs 4.8 and 4.9 on the content of Regional Strategies appropriate to ensure Regional Strategies focus on the key priorities for the region?

We feel that paragraph 4.8 is missing a crucial element by not mentioning social challenges and opportunities under point 2.

We agree with the statement at point 1 of paragraph 4.9 but as mentioned above feel that it isn't consistently supported throughout the document. We would like to comment on point 3 that it takes more than houses to create sustainable, well-connected and inclusive mixed communities – there is an important social agenda here. We would suggest at point 5 that as well as identifying the areas with problems it would be helpful to outline action to take to tackle those issues. Some caution is needed around this issue, because of the stigmatising effect of naming specific areas with particular problems. On point 6 we would suggest that infrastructure investment is a key problem for the region – this maybe needs more prominence.

1.5 Is there a need for more detail in the policy on how responsible regional authorities should decide on the priorities for their Regional Strategy? If yes, what should this detail comprise?

As outlined above, a specific requirement for RRAs to consider and prioritise social elements in their Regional Strategies would be helpful. This is one element which would be particularly likely to be overlooked without specific reference.

Process of developing regional strategies

1.6 Is the policy on the project planning and the preparation of a Project Plan appropriate? If not, how can it be improved?

We welcome the statement in point 5.8 about the involvement of key stakeholders at the preparation stage of a project plan. We would suggest in point 5.9 that these stakeholders should also be involved in agreeing the scope and content of the plan.

1.7 Is the policy on Statements of Policies on Community Involvement at Paragraph 5.17 appropriate? If not, how can it be improved?

We welcome the inclusion of this section in the guidance, and feel that it is a vitally important part of the whole. There are a few comments that we would like to make to improve it.

At point 5.15 we would suggest that the engagement of partners in the preparation of strategies is of value for more than just balancing competing demands and commanding support. Stakeholder engagement is important because of the knowledge and expertise that can be gained, as well as to ensure that the needs and views of all sections of the community are fairly considered.

We suggest that in 5.15 it should be specified that engagement should be at an early stage, not just 'timely'. Also in 5.17 point 4 we think it should be specified that stakeholders should be involved from an early stage.

At 5.20 we feel that the last sentence should state that RRAs should "engage with" a much wider range of stakeholders rather than "consider engaging with" the same.

Finally, the glaring omission in this section is reference to using the Compact to set the standard for relations between the public and third sector during the development of regional strategies. We would welcome an additional clause referring to this specifically.

1.9 Is the policy framework to guide the Examination in Public process appropriate?

We have only one comment for improvement of this section, and that is at 5.39, point 3. We feel that the Examination in Public should not only check that strategies have been prepared in accordance with the Statement of Policies for Community Involvement, but also that the said Statement is appropriately robust to cover all sections of the community, and ensures that views are genuinely sought to improve the strategy.

1.10 Appendix A describes the broad stages of the Regional Strategy revision process. Does this provide the appropriate level of detail to guide responsible regional authorities in preparing their Strategies? If not, how can it be improved?

We feel that Appendix A provides a useful summary for referral, but is noticeably missing sufficient reference to involving stakeholders. Because of the hesitation of many RRAs to adequately involve stakeholders we feel that this element needs to be fully emphasised.

We think that reference should be added in 'Project Planning' bullet point 2, 'Drafting Regional Strategy Revision' bullet point 6, 'Finalise Regional Strategy Revision' bullet point 1, and 'Implement and Monitor Regional Strategy' bullet point 1.

Additional documents

1.8 Is the policy framework on the role of Sustainability Appraisals and the appraisal of issues and options in relation to the Regional Strategy process appropriate?

4.1 Do you support the approach proposed for the new guidance at Annex 4, taking the Practical Guide as the main document with a supplement on Sustainability Appraisal?

4.2 Do you think that the Practical Guide and the supplement together provide enough guidance to undertake Sustainability Appraisal that are compliant with legislation and meet the Regional Strategy's objective of promoting sustainable development?

We fully support the inclusion of these elements, and have no specific improvements to recommend. We welcome the recognition of the different aspects of Sustainability Appraisal.

We feel that as well as a Sustainability Appraisal it would be important to carry out an Equality Impact Assessment to consider the impact of the various policies on different communities.

1.11 Paragraph 5.49 sets out the key expectations of Implementation Plans. Are these appropriate and do they provide sufficient clarity?

We think that more mention should be made of involving stakeholders in the creation and delivery of the Implementation Plan.

We question how the usefulness of the plan will be assured considering the clauses set out at 5.50. We are concerned that there is limited coverage of arrangements for monitoring and accountability of the Plan.

We suggest that the Implementation Plan should be subject to full Sustainability Appraisal considering the importance of the document.

1.12 Paragraph 5.60 sets out the broad policy for the preparation of annual monitoring reports. Is this appropriate and does it provide sufficient clarity?

Yes – no amendments to suggest.

1.13 Paragraph 6.1 set out the approach to the preparation of documents to support the Regional Strategy. Does this make it clear how documents should relate to the Regional Strategy?

This paragraph is clear in that the documents should not form part of the strategy itself. However it could be useful to cite a few examples of the types of documents included here.

Draft Regulations

2.1 Do you have any comments on the proposed scope and detail of the proposed regulations set out at Annex 2?

Under point 2 we think that the list of “specific consultation bodies” is rather patchy and needs revising to cover the full spectrum of relevant stakeholders.

We think that 3(a)i should not refer to persons “who *appear to the RRA* to have an interest...”, but instead to persons “who have an interest...”.

Section 4(1) should reference the involvement of stakeholders in the list of elements that the project plan should contain.

Finally, we are astounded that it should be considered that no impact on the private or voluntary sectors is foreseen from these Regulations (see last paragraph of the Explanatory Note), and would suggest that it is crucial that an impact assessment should be carried out as a matter of priority!

Leader’s Boards

3.1 Do you agree with the range of considerations under each of the three broad criteria that the Secretary of State will take into account when considering schemes for the establishment and operation of a Leaders’ Board, as set out in the guidance at Annex 3? If not, how should they be changed?

Yes, broadly we do.

One point to make however about the Leader’s Boards is about the streamlining arrangements. In our region the Shadow Leader’s Board currently being established includes representatives from every county, unitary and district authority in the region, which isn’t a significant reduction from the current arrangements! If the intention is really to produce a streamlined structure for the regions some more specific outlining of what this means will be required in this document.