

Prosperous Places: Taking forward the Review of Sub National Economic Development and Regeneration

Consultation Response Royal Institute of British Architects June 2008

The RIBA in the regions

The Royal Institute of British Architect's mission is to advance architecture by demonstrating benefit to society and promoting excellence in the profession.

At a regional level, the RIBA engages in a number of activities and works in partnership with a range of stakeholders from the public, private and voluntary sectors. The built environment has a real and important influence on social and economic factors and as such the RIBA engages with a diverse range of stakeholders including built environment professions, local planning authorities, and other regional, sub-regional and local bodies with a remit for sustainable communities.

Design, spatial planning and the economy

Good design and architecture has a real impact on the economy and society with benefits to health, education, safety, employment and other socio-economic factors¹

As widely recognised, well designed places with high quality housing, accessible transport links, employment opportunities and other sound infrastructure such as educational and health facilities attract and retain people to cities, regions and localities. High quality and design and architecture is fundamental to this, aiding a good lifestyle and instilling a sense of civic pride.

Taking Forward the Sub National Review

There are clear opportunities and potentially huge benefits of integrating the remits of the Regional Assemblies (RA) and the Regional Development Agencies (RDA), not only for purposes of efficiency but also due to the interrelationship between economic and social progress and sustainability and the role that spatial planning must play in both these elements. We provide recommendations below for utilising such opportunities.

However, for these opportunities to be realised there need to be certain factors in place that ensures representative, informed and accountable decision making and implementation. As it stands, the proposed structure in this consultation document falls short of this and is in danger of undermining good practice and progress already being made. We give an outline of our concerns below and provide recommendations to address these.

Decision making and accountability

It is essential that regional stakeholders (including the public) are able to influence the decision-making of the RDA. The integrated regional strategies must be properly informed to accurately reflect the regions – the people's needs, aspirations and lifestyles.

The RDA, as proposed by this structure, would essentially be able to choose whom to engage and listen to bypassing those it did not, being answerable only to the Secretary of State

We have concerns that the role of the Local Leaders' Forum as envisioned would fail to provide scrutiny of the RDA and would not provide that crucial community engagement at that level.

Local Leaders' Forum

With limited powers, the proposed LA Leaders' Forum will act only as a consultative group whose comments can easily be discarded. The Forum will have no statutory powers to scrutinise the work of the RDA as does the RA and as such the RDA will have little responsibility to engage with and listen to the Leaders' Forum.

In addition, the ability to scrutinise is further undermined by local authorities being potential recipients of RDA funding.

We believe that with limited powers and time constraints, the Leaders' Forum will be poorly attended, or fail to attract the necessary caliber of representative necessary to overcome its shortcomings.

Stakeholder representation

Fundamentally, the proposed Forum also lacks the crucial component of stakeholder representation (the latter making up a third of the RA governance).

Regional stakeholder groups are an important way to ensure a wider range of expertise informs the process of decision-making on a number of important and relevant issues such as housing, architecture and design, environment, engineering, equality, and employment. This will:

- help ensure that regional strategies take account of these issues and the intricate disparities within regions as stakeholder organisations working close to the community are well placed to appreciate.
- aid strategic thinking by Local Authorities by raising understanding and awareness of these cross-cutting issues.

RIBA Recommendation

1. Proposals in this document should be reviewed to ensure a forum is accountable, representative and influential.

2. The legislation should require the RDA to agree with a representative 'forum' of stakeholders based on social, environmental and economic merits for sign-off of the integrated regional strategy alongside the LA Leaders' Forum.

Stakeholder engagement

While the importance of stakeholder engagement is recognised throughout the consultation document, and is to be welcomed, this needs to go beyond consultation and include influence, negotiation and agreement. How the RDA engages stakeholders will need to be determined in agreement with stakeholders themselves.

RIBA Recommendation

3. The RDA will need to undertake a process of understanding the stakeholders in the region and explore with them how best to engage them in meaningful ways

In addition, the consultation document makes no mention of the need for a collective voice for stakeholders. Regions benefit from the ability of stakeholder representative groups to identify cross-sectoral interests and where possible resolve any apparent differences of view before engaging with regional agencies such as the RDA. Whilst this does not prevent the different sectors from engaging the RDA separately, it increases efficiency in the overall stakeholder engagement process. The RDAs will need to recognise and support the development of existing stakeholder groups (including those currently linked to the RAs).

RIBA Recommendation

4. RDA to understand, utilise and support the development of existing stakeholder networks in the region

Stakeholder engagement at a local level

One of the concerns is the lack of recognition of the Local Strategic Partnerships (LSPs), Local Area Agreements (LAAs) and the role of the Sustainable Community Strategy (SCS).

While the success of the LSPs variesⁱⁱ, the LSPs are a partnership of representatives from the public, private and voluntary sectors with a remit to coordinate decision-making, policies, strategies and funding at a local/*sub-regional* level.

The remit for the LSPs is to support the development of the Sustainable Community Strategies (that each Local Authority must set up) and ensure that the LAAs (which utilize funding streams from central government to achieve locally determined outcomes and improve service-delivery in local areas) reflect the SCS.

These partnerships should be engaged with by the RDA as a stakeholder network and should be supported to develop by the RDA (as discussed above).

Spatial planning and community regeneration

The RDA should take a lead in encouraging and supporting LSPs to engage with the process of developing Local Development Frameworks. There is a crucial link between the work of the LSPs and the outcomes in the LAAs and the work of planners and the outcome of the LDFs. If these links are successfully made, the strive for social and economic sustainability (as featured in the LAAs) will be properly supported and delivered by spatial planning (sustainable communities being fundamental to spatial planningⁱⁱⁱ).

Spatial planning is a key mechanism to tackling root causes of social problems. Examples of the links between the LAA outcomes (which should reflect the Sustainable Community Strategy objectives) and planning are^{iv}:

- LAA outcome: *Health and Wellbeing*. Planning Contribution: parks, recreation and sports provision, access to good and services, strong economies and access to employment, design.

- LAA outcome: *Safer Communities*. Planning Contribution: landscaping, transport, design.
- LAA outcome. *Vibrant and Sustainable Neighborhoods*. Planning Contribution: housing and design, transport, safe and green environments, school provision and design.
- LAA outcome. *Economic Development*. Planning Contribution: availability of employment sites and access, transport, housing design and location, energy provision, access to goods and services, social and environmental infrastructure.
- LAA outcome. *Social Inclusion*. Planning Contribution: housing quality, design and provision, transport, equal access to good and services.
- LAA outcome. *Combating Climate Change*. Planning Contribution: Transport, recycling, housing design and renewal, access to good and services, transport.

For all LAA outcomes, good quality design of the built environment is crucial to their success.

A collaboration between LSPs and planners will help ensure these issues are integrated and LSPs (and other stakeholders) are more informed by planning ‘evidence’ with a spatial and environmental understanding for setting their objectives. Collaboration will help provide planners with a better understanding of other service-delivery agencies and objectives and reflecting this in local planning^v.

RIBA Recommendation

5. RDA (and GOs) to encourage LSPs to engage with the process of developing LDFs – spatial planning being a delivery mechanism of LAAs/(MAAs).

6. RDA to support planners (with an understanding of design quality) to engage and work with LSPs/Multi Strategic Partnerships sharing ‘evidence’ on planning issues and community needs.

Sub-regional- context

We welcome the recognition in the document for sub-regional and intra-regional working. The Multi Area Agreements (MAAs) should form an important delivery mechanism. We believe these should also reflect and integrate spatial planning, a lead taken by the RDA (as discussed above).

Planning at a sub-regional level is crucial if the national and regional strategies are to be effective^{vi}. The sub-regions have identifiable and distinct spatial dimensions – economic development and the city regions; housing markets and cross boundary supply; transport networks and the nature of travel to work. Aligning policy and implementation is crucial to reflect sub-regional dimensions, such as strengthening policy to ensure the adequate delivery of housing supply. Fundamental in improving the economic performance of sub-regions and city regions is the spatial planning and social dimension to strategies. We note here that successful spatial planning requires good quality architecture and design.

Structures will need to be put in place to support local authorities and LSPs to work collaboratively. We believe that this should be formalised and support proposals to make this a statutory relationship. We would caution against a statutory relationship preventing flexibility and allowing for membership to expand and change.

The document makes no mention of the duty *to consider sub-regional work* (as currently held by the RA). We believe that this duty should be transferred to the RDA.

RIBA Recommendation

7. RIBA support MAAs being made statutory. The RDA need to ensure membership of Multi Strategic Partnerships are open and flexible.

8. RDA to have *duty to consider sub-regional work*. As part of this, RDA to support local authorities' collaboration at a sub-regional level.

RIBA Recommendations

See 1 to 8 above

Further RIBA recommendations – design specific

At the regional level, we want to see the RDAs take a proactive role and lead for design quality and further the links between spatial planning and the delivery of sustainable communities through:

RIBA further recommendations

9. Design review at all levels. The RDA should explore (with partners) how to further the use of and development of regional and local design reviews. LAA and MAAs initiatives should be subject to design review as are regional economic strategy initiatives. This will help ensure design quality is embedded at all levels and by local authorities.

10. Design champions on the RDA Board (a continuation of this role from the Regional Assemblies).

11. Consult and engage with local and regional built environment, design and other stakeholders/groups of stakeholders to inform policy and delivery.

12. Explore mechanisms to ensure local authorities embed design quality including:

a) design quality training for planning officers and members;

b) run local and sub-regional design review panels (as above);

c) ensure spatial planning and sustainable communities agenda is properly intergrated at the local and sub-regional level. Ensure LSPs/Multi-Area Strategic Partnerships work collaboratively with planners (who have an understanding of design quality) through the process of developing LDFs.

The RIBA will explore the need for architects and other design professionals to work alongside planners in engaging with LSPs and for RIBA staff members to be part of LSPs themselves.

Consultation Questions – further comments

Chapter 3 – Stronger partnerships for regional growth

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

It is questionable whether RDAs are appropriate bodies to make an assessment of this kind on their own. These decisions would best be made by the RDA and a strategic partnership involving local authority members and local stakeholders representing social, economic and environmental interests.

In addition, some RDAs are already supporting sub-regional working. The North East RDA for example, is already devolving to sub-regional to deliver on their RES. These examples should be looked at.

We recommend the duty placed on the RA to be transferred over to the RDA (Recommendation 8 above).

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

As discussed above, the Local Leaders' Forum as proposed is highly problematic relating to limited powers, lack of stakeholder engagement and representation and conflicting role for scrutiny.

There are existing stakeholder networks already in the regions and those engaging with local authority elected members that need to be drawn upon.

(Recommendations 1 & 2)

Proposals in this document will need to be reviewed to ensure a 'forum' is accountable, representative and influential.

The legislation should require the RDA to agree with a representative 'forum' of stakeholders based on social, environmental and economic remits for sign-off of the integrated regional strategy alongside the LA Leaders' Forum.

Q3. Are the proposed regional accountability and scrutiny proposals proportionate and workable?

They are not proportionate. Under the proposals there is no effective means by which the RDA can be held accountable to the people of the region. The accountability instead will be to the Secretary for Business Enterprise and Regulatory Reform in Whitehall. It is unlikely that the local authority leaders' forum would operate sufficiently effectively to be able to exercise any scrutiny powers (see discussion above and answer to question 2).

The proposals for scrutiny are workable if the intention is to have them exercised by BERR rather than representatives of the region.

Chapter 4 – Integrating regional strategies to promote growth

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

A thorough understanding of the region must underpin the regional strategy/ies, by using

1. Baseline assessment of evidence about the region

And,

2. understanding of stakeholder expertise and work

Regional Observatories must be used for baseline data and evidence. The issues raised by regional stakeholders need to be explored – expertise on different matters such as housing, environmental issues.

As discussed above, in particular, LPSs and planners (with an understanding of design quality) need to work together to further the evidence base relating to spatial planning, social and economic based information held by the different stakeholders.

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

This is would be reasonable if based on evidence as it is important to reflect regional distinction.

In addition, the single strategy needs to be examined in public (like the RSS) and drawn up by a strategic partnership of local authority members and social economic and environmental stakeholder representatives working with the RDA.

Who will sign off this strategy? We propose that the RDA, Local Leaders Forum and a representative Stakeholder Forum jointly sign off the strategy (Recommendation 2).

It will need to have a sustainable appraisal.

Q6. Do you think that the streamlined process would lead to any significant changes in the costs and benefits to the community and other impacts?

We believe that this is likely to be very beneficial if done well due to the interrelated nature of economic and social progress and the delivery impact spatial planning has on this.

Good practice need to be acknowledged and developed in the regions and intra-regionally (as discussed above).

However, the single ‘streamlined’ process can only be effective with proper processes in places, based on regional engagement, accountability and strong evidence. The ability to produce a regional strategy more quickly would be of no benefit if it did not represent the needs and aspirations of the people of the region.

Chapter 5 – Strengthening sub-regional economies – the role of local authorities

Q7. Which of the options for the local authority economic assessment duty (or any other proposals) is most appropriate?

Option 2 outlines what areas evidence should be gathered on which will guide local authorities.

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

We believe this is for local authorities to answer. We would stress though the importance of evidence use and assessment of this. In addition, the need for local authorities to speak to stakeholders who know what is going on in the regions to understand and build upon existing roles with partners and regional relationships.

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

(Recommendations 3 and 4).

The legislation should require the RDA and regional LA Leaders to agree with existing stakeholder groups, including those with representation on the RA, the arrangements for engagement of stakeholders in regional development and regeneration.

RDA to understand, utilise and support the development of existing stakeholder networks in the region.

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

They should engage with stakeholder networks and partnerships and in particular LSPs.

Q11. Should any duty apply in London and, if so, which of the proposed models is most appropriate?

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

MAAs tie people into long term arrangements – so need for formal relationship. However, we raise the concern that being statutory could potentially make the relationship less flexible and prevent new partners from being involved.

(See Recommendation 7 above).

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

Activities appropriate to a sub region rather than to a single local authority or a whole region.

RDA (and GOs) should encourage LSPs to engage with the process of developing LDFs – spatial planning being a delivery mechanism for the LAAs.

RDA should support planners (with an understanding of design quality) to engage and work with LSPs/Multi Strategic Partnerships sharing ‘evidence’ on planning issues and community needs.

(Recommendations 5 and 6).

ⁱ CABE. The Value of good design: How buildings and spaces create economic and social value.
www.cabe.org.uk

ⁱⁱ Wilson, L.2003.Local Strategic Partnerships Experiences in GB. There is also an investigation commissioned by the South West Government Office into LSP engagement with third sector partners.

ⁱⁱⁱ The new spatial planning system is tasked to deliver positive social, economic and environmental outcomes, and requires planners to actively collaborate with the wide range of stakeholders and agencies that help to shape local areas and deliver local services. Local authorities being seen to have a role as 'place shapers'. RTPI.2007.Planning Together. Local Strategic Partnerships (LSPs) and Spatial Planning: a practical guide.

^{iv} RTPI.2007.Planning Together. Local Strategic Partnerships (LSPs) and Spatial Planning: a practical guide. pg 11

^v ibid

^{vi} CLG. 2008.Planning and Optimal Geographical Levels for Economic Decision Making – the Sub-Regional Role.