

# Joint Implementation Plan Consultation: Response from East of England Rural Forum

## East of England Rural Forum

The East of England Rural Forum (EERF) is an independent body and its purpose is to provide a voice for rural stakeholders at a strategic level, capable of influencing the rural agenda in the East of England.

At its meeting on 10<sup>th</sup> June 2009 in Swaffham, EERF received a presentation on the JIP from Andy Fisher. This was then discussed by the members of the EERF who identified their top concerns and comments. These have been used to provide the responses detailed below.

Previously (June and September 2008), EERF had considered the overall policy for growth in the East of England and identified key areas for action so that the potential for the region is achieved and that the aspiration of a fair and equitable share of that success for all, including rural communities, is achieved. The Forum's Growth paper summarising its position is attached for your information and its key points used to respond to the specific JIP consultation questions.

## Where are we now?

1) Is the Analysis in the 'Where are we now' section accurate and complete? If not, what evidence supports your view?

Although the overarching policy of "rural mainstreaming" is accepted as a given, the lack of any recognition of the distinct needs of rural communities and the design of solutions and delivery mechanisms that would be effective in rural locations, both act to limit the growth potential for the region and miss opportunities for action to help the region (and country) out of recession. The recent Rural Advocate report to the PM identified a potential boost to the national economy of about £300bn if rural businesses were given the support and enabling conditions to thrive. A direct benefit of a more diverse economy, embracing rural businesses would also be a greener, more sustainable economy.

We wish to see a JIP that can help the region deliver a more effective growth policy in rural areas by:

- Balancing a focus on city growth with a dynamic economic development policy for rural areas to spread economic success, reduce the need for commuting and make rural communities more sustainable;
- Ensuring planning policy supports the creation of more rural employment land to match the increase in rural housing stock;
- Rolling out high speed broadband to rural areas to help rural businesses gain the benefits of the latest developments in the digital economy;

- Providing enhanced rural business support and skills provision to support growth of new low impact industries in growing sectors;
- Providing incentives for employers to offer full or part time home working to reduce the need for commuting;
- Ensuring that regional housing targets and funding prioritise affordable rural housing for both 'key workers' and those employed in local businesses;
- Implementing appropriate improvements to the rural road infrastructure to support community sustainability by supporting local economic development and access to services to reduce the need for commuting to access jobs, services or recreation;
- Recognising that rural areas cannot depend on public transport and that blanket policies such as road tax and fuel duty impact disproportionately on the poorest rural inhabitants who have no viable alternative options.

So while we agree that the analysis is correct and accurate, there is a lack of sophistication in understanding the relative contributions and needs of urban and rural. We would wish to see disaggregation of the data and more explicit recognition of implementation targets and delivery mechanisms that respond to different locations within and across the region - more than that described in the "By Place" section.

#### How do we get there - by Theme?

2) Do you think the categorisation of the current themes and sub regional priorities adequately captures the ambitions of the regional economic and special strategies?

The current themes cover all aspects of the targets from the RES but fail to pick on all the objectives of the RSS producing an imbalance in the scope of the JIP. There is insufficient attention to the objective "*To improve the quality of life for people in the region*" and associated programme activity to delivery sustainable inclusive communities.

The format of seven major themes provides benefit for a focussed set of delivery programme but imposes a silo mentality that fails to join up related topics and delivery across the themes. Table 1 shows both the interrelationship between programmes and themes and some of the arbitrary allocation between say Business and Skills and between Utilities and Green Infrastructure. Given the expected cuts in public expenditure, greater efficiencies through fewer, more cohesive, joined up delivery programmes will be necessary.

There is a lack of clarity and consistency in regard to the different responsibilities of regional and local bodies. The role of region should be those activities which can only be done and those which are best done at regional level, eg securing national government investment funds, strategic regional transport links and (enabling activities) providing regional planning policy and regional sources of expertise. Conversely, local authorities should focus of delivery combining funding from all sources and responding to local priorities and local context.

This latter point should include direct support for community development and active community engagement. In this way the right priorities will be chosen and the right (effective) delivery solutions used to solve them. For rural communities, this is especially important since financial cuts can only exacerbate poor access to services and facilities in rural areas. The most cost effective solution is a (relatively) small investment in communities through (say) community-led planning that will enable communities to help themselves and fill the gaps in public and private service provision.

## Housing

3a) Does the theme and its programmes capture the ambition for the region and scale of the challenge? If not, what changes would you suggest and what evidence supports these changes?

The preamble correctly recognises the planning policy constraint on provision of small developments and the opportunity to meet regional targets through greater dispersed housing provision, especially affordable. This regional challenge is not picked up in later implementation programmes.

Similarly, the theme acknowledges the essential contribution affordable housing makes to sustainable settlements and a thriving economy but fails to tackle it. Where is the connection to local planning through a rural housing action plan based on a quantitative assessment of need? The regional aggregation of these targets would then provide the regional need and inform a delivery programme based on a more dispersed building target.

The needs for housing in rural areas differ from urban in that the provision should be based on local need and the number of properties built is a balance between economies of scale (cost to build), the services available for occupants and the land available. Land for development is a particular constraint as it needs to satisfy both the builder's budget and the planner's constraints. The CLA should be identified as an enabling delivery partner.

3b) Is there other existing or planned work we should include that will significantly deliver the headline targets and ambitions of the RES and RSS?

In the list of partners, the RCC network is noticeable by its absence and as providers of dedicated housing enablers is an important contributor. Rural Housing Enablers provide independent objective support to Registered Social Landlords, communities and planners to ensure the best provision for the community. They support local authorities and housing associations by undertaking detailed housing needs surveys, which form a database of information to match need and provision. They work with land owners and planners to enable small local developments in rural locations and are in a position to aid the delivery of the rural housing allocation. Small developments also give the opportunity for smaller builders to tender for contracts and can support local suppliers and businesses.

3c) Are there any programmes that you would prioritise or remove? What are your reasons for this?

Of the highest priority is unblocking the planning system around rural business and affordable housing, ie implementation in full of the Matthew Taylor report. This would include lower thresholds for requirement of section 106 exception sites.

## Transport

4a) Does the theme and its programmes capture the ambition for the region and scale of the challenge? If not, what changes would you suggest and what evidence supports these changes?

We support the theme and the resulting programmes but would welcome the inclusion of community transport solutions, and the feasibility of using schemes such as Wheels to Work to address the skills and employment theme.

We accept that transport has to address carbon reduction, however it needs to be recognised that in more rural areas cars are essential to day to day living and public transport solutions are not available.

If services to be offered via engines of growth areas and service hubs then transport to service provision is vital.

4b) Is there other existing or planned work we should include that will significantly deliver the headline targets and ambitions of the RES and RSS?

None

4c) Are there any programmes that you would prioritise or remove? What are your reasons for this?

None

## Utilities

5a) Does the theme and its programmes capture the ambition for the region and scale of the challenge? If not, what changes would you suggest and what evidence supports these changes?

This is a strange Theme that does not hang together. The energy, water and waste aspect should be part of the Green Infrastructure and the ICT should be part of the Business theme. Why isn't Intelligent Transport Systems section under Transport theme?

## Energy

There is no recognition of the impact of "peak oil" on energy supplies and cost.

There is no recognition of the high cost of energy (petrol and fuel oil) in rural areas and lack of alternatives (gas). Linked to this is the age of rural housing stock, which makes it more difficult to reduce heat loss and energy requirements. Fuel poverty will be significantly higher in rural households.

### ICT

The ICT topic does not sufficiently capture the importance and the existing lack of high quality (speed and contention ratio) broadband as a key enabler of rural businesses.

### Water

Consideration of use of water in rural areas is more than agriculture but includes many other rural businesses as well as domestic.

**5b) Is there other existing or planned work we should include that will significantly deliver the headline targets and ambitions of the RES and RSS?**

There is no investment in individual and community level behaviour change which could significantly reduce energy usage (carbon emission) and initiate use of renewable energy sources. An example of great potential for innovative delivery was the 'Cut Your Carbon' scheme supporting community low carbon solutions which would deliver measurable carbon reduction through greater community awareness and actions and through support for community based pilots which could be replicated across the region.

Where is any reference to nuclear energy? The closure of existing old power stations will have an impact on local businesses and employment. The possible new power stations will provide economic and carbon reduction benefits but are not considered.

Where are actions to reduce creation of waste and support for re-use and recycling? The theme only considers management and treatment of waste.

**5c) Are there any programmes that you would prioritise or remove? What are your reasons for this?**

Energy - Fuel poverty is of concern given the economic environment and that that fuel prices will increase as fossil fuels become scarce (peak oil). Investment in solutions for improving the energy efficiency of old housing stock and support for its delivery is essential.

Water - Where is the link to housing to reduce use of water through more efficient systems and increased use of grey water? Where is the link to environment and localised flash flooding both rural and urban? Where is the link to planning policy to encourage/require and support water retention and local absorption through eg green roofs and use of water permeable surfaces?

ICT-we strongly support increased availability and higher quality of broadband across the region. Rural businesses are more likely to be SME and depend heavily on computer and communications technology. Home working as an important option for people living in rural areas and supports the ambition to reduce car use impacting on carbon emissions and road congestion. With unemployment levels increasing this will widen the opportunities for employment to those in remote areas.

## Enterprise, Business Support and Innovation

6a) Does the theme and its programmes capture the ambition for the region and scale of the challenge? If not, what changes would you suggest and what evidence supports these changes?

The theme is one of the most important ones for the region and we strongly support its ambition. However, the analysis especially regarding start-up and entrepreneurship neither identifies the rural component nor recognises opportunities that would be delivered through improvements in support for rural businesses.

There needs to be explicit reference to the creation of an enabling and supportive rural business infrastructure. This would embrace

- Improved and increased out-reach business support
- Increased provision of business premises in rural locations. Much of this could be achieved through re-use of and refurbishment of existing buildings and a more benign planning system
- Easier access to training and education by rural managers as well as workers
- Higher quality broadband
- Easier access to relatively small financial investment

6b) Is there other existing or planned work we should include that will significantly deliver the headline targets and ambitions of the RES and RSS?

More flexible funding criteria for programmes such as RDPE (Leader), which could then support rural retail activities, including community enterprises. This could also include opportunities for use of empty urban (eg Woolworths) shops through community land trusts to provide multi use buildings and diversification of existing businesses including outlets for local food and products, hosted post office, health services, banking etc.

6c) Are there any programmes that you would prioritise or remove? What are your reasons for this?

We would prioritise integrated outreach business support for rural start-up and business growth.

## Skills and Employability

7a) Does the theme and its programmes capture the ambition for the region and scale of the challenge? If not, what changes would you suggest and what evidence supports these changes?

Within the East of England whilst average skills attainment figures for rural areas are broadly similar to urban areas, the average masks a **significant underperformance in peripheral, more remote & coastal areas** which is creating long term economic & social problems for these areas.

If the theme ambition is to be achieved then the problems rural areas face in accessing skills provision must be tackled. We wish to see investment in:

**Policy and planning of educational provision:**

- Recognise the rapid changes taking place in rural employment patterns when planning future skills & education funding & provision;
- Consider introducing Rural Targets within the implementation plans for Leitch during the process of producing PSA targets for the CSR 2007;
- Recognise within funding methodologies the extra costs faced by providers in sparsely populated areas. This should include investigating if the sparsity factor we understand is applied to funding in Wales has helped provision in rural areas, and the lessons we can learn from this.

**Implementation, by providing extra support for:**

- Adult & Continuing Education to help the whole rural community respond to the rapid changes in employment opportunities;
- 'Bite sized' courses to help smaller employers & individuals access more flexible provision which more closely meets their needs;
- Accessibility & rural outreach projects with specific funding to close the gap in educational attainment in areas where provision is weak.

**Business and community engagement, by:**

- Creating enhanced incentives for SMEs to invest in skills provision and promote collaborative employer based provision.

While we are pleased to see the support of the thriving third sector, it begs the question why is its contribution only recognised under this Skills theme? It has potential to deliver across all themes either directly as a delivery partner or indirectly as an enabler for community action and self help.

**7b) Is there other existing or planned work we should include that will significantly deliver the headline targets and ambitions of the RES and RSS?**

- Supporting the creation of new Universities in areas which previously lacked provision (University College Suffolk);
- Undertaking an active regional research programme driven by the EESCP which is clearly highlighting the areas in which future rural investment is needed by all parts of the public and business sector;
- Using new funding flexibilities as they become available e.g. the new flexibility within LSC funding to support adult non-qualification bearing courses, which are often instrumental in attracting hard to reach adults;
- Championing new approaches such as integrated student and travel to work public transport provision, to make both more viable.

Investment in a coordinated regional approach to innovative scheme of Wheels to Work.

**7c) Are there any programmes that you would prioritise or remove? What are your reasons for this?**

None

### Culture, Creativity and the Visitor Economy

8a) Does the theme and its programmes capture the ambition for the region and scale of the challenge? If not, what changes would you suggest and what evidence supports these changes?

The theme seems to focus on creation of a green playground for visitors rather than an asset for residents to be proud of, to protect and to enjoy. The Creative Places does not fit comfortably as a single programme with Sustainable Communities which do not seem to figure in the outcomes.

This theme should include sport explicitly and include health and well-being aspects of the RSS, eg play and access to natural environment for residents not just visitors.

The support for community led tourist attractions such as Hidden Britain Centres would add to delivery of the ambition.

8b) Is there other existing or planned work we should include that will significantly deliver the headline targets and ambitions of the RES and RSS?

Where is recognition of the market town initiatives focused on tourism such as in Watton, Whittlesey and Harwich?

Where is inclusion of Slow Food, Slow Cities (Cittaslow) and other food initiatives which both support local businesses and food producers and act as attractions for visitors?

Where is recognition for local cycle, walking, canal and river footpaths with connecting buses as in Bedfordshire and Hertfordshire?

8c) Are there any programmes that you would prioritise or remove? What are your reasons for this?

No

### Green Infrastructure, Landscape, Heritage, Flood Risk and Coastal Environments

9a) Does the theme and its programmes capture the ambition for the region and scale of the challenge? If not, what changes would you suggest and what evidence supports these changes?

This Theme mixes some aspects of climate change adaptation with more general protection and enhancement of our natural environment. It also fails to consider the more distributed smaller scale special natural environmental areas in its concentration of coastal flooding and erosion.

The list of delivery partners seems not to recognise the private landowners who have a significant contribution to make.



9b) Is there other existing or planned work we should include that will significantly deliver the headline targets and ambitions of the RES and RSS?

See above

9c) Are there any programmes that you would prioritise or remove? What are your reasons for this?

No

### Any Gaps?

10) Are there any other programmes outside the themes that might be needed to successfully deliver the two regional strategies?

Missing from JIP is the Empowerment East programme. More generally the JIP fails to recognise, include and support community participation across most of these themes and their programmes.

### How do we get there - by place?

11a) Does the theme and its programmes capture the ambition for the region and scale of the challenge? If not, what changes would you suggest and what evidence supports these changes?

As a regional document, there is a surprising detailed linkage to LAA National Indicators (NIs). This strays into micro-management without clear benefit. As a document with a 2012 time horizon, this detail is likely to become obsolete as LAA priorities change and national (NI) policy evolves. Much better to focus on linking regional ambitions with local outcomes and challenging local players to make the explicit delivery programme connections.

We are concerned at the implicit "trickle down" benefit implied by the focus on a few areas for investment and general lack of explicit support for rural areas. We are particularly concerned at the wording "Importantly, it is *anticipated* that all of the sub-regions will pick up issues not only around their urban drivers, but also around their market towns and rural hinterlands including the regions coastal environments". Use of the word "*anticipated*" is not sufficient not adequate. There should be an explicit requirement "*expected*" for sub-regional delivery partners to include rural hinterlands in their planning and as targeted beneficiaries.

11b) Is there other existing or planned work we should include that will significantly deliver the headline targets and ambitions of the RES and RSS?

Rural - urban data disaggregation is vital to ensure accurate analysis and correct prioritization for intervention. Rural Action East is collecting evidence on deprivation based on accepted and replicable data for rural and urban areas that would help to direct investment.

11c) Are there any programmes that you would prioritise or remove? What are your reasons for this?

No

**How do we monitor progress?**

12) Do you have any comments about the proposed governance and monitoring mechanisms set out in the implementation plan?

Separate monitoring and reporting for rural and urban

**Presentation**

13) Do you have any views on the presentation of the final implementation plan in terms of its length, structure or design?

The full JIP is a very long document we would welcome a summary document with the detail in the Executive Summary and the sub regional priorities tables which are very useful with their links to the NI targets of that areas LAA. The lack of the Theme/Place Name on page headers and numbering of sections makes it very difficult to find your way around the document.

14) Do you have any comments on the climate Change Action Plan?

Why is their not a web link to the location of this plan?

David Wood, 16<sup>th</sup> July 2009  
On behalf of East of England Rural Forum