

Sub National Review
Bay 1116
Department for Business, Enterprise and Regulatory Reform
1 Victoria Street
London SW1H 0ET

<http://www.bmgresearch.co.uk/SNR-Consultation>

19 June 2008

Dear Sir,

PROSPEROUS PLACES: TAKING FORWARD THE REVIEW OF SUB-NATIONAL ECONOMIC DEVELOPMENT AND REGENERATION

BCSC welcomes the opportunity to comment on the Government's proposals for producing an integrated regional strategy which brings together the current Regional Spatial Strategy (RSS), the Regional Economic Strategy (RES), and other regional investment strategies in a single document.

The British Council for Shopping Centres (BCSC) was established in 1983 to provide a forum for those engaged in retail and shopping centre development and management. BCSC represents virtually every aspect of retail property activity. Our mission is to promote best practice in the development and management of the retail environment and to portray a common vision, helping our members work together, exchange and develop information and advance the professional and commercial aims of the retail property industry as its centre of excellence.

BCSC has commented on two recent CLG consultation documents:

- Draft PPS4: Planning for Economic Development; and
- Lifting the Burdens from Economic Development and Regeneration

Our responses are at: <http://www.bcsc.org.uk/govtconsult.asp>

General comments

BCSC welcomes the proposal to integrate the current set of regional strategies and set out a vision for the next 15-20 years that reflects the region's distinctive geography and economy (para 4.1). We are, however, concerned that, as described, the new-style strategies do not appear to have a clear spatial vision – to say clearly what the spatial pattern of development in the region should be, how the city regions should grow and which city and town centres should be the focus for development. The document appears to lack a spatial framework.

Importance of creating prosperous places

Economically-successful town and city centres are both the drivers of the regional, sub-regional and local economies and the barometer of a region, sub-region or a locality's success. Major retail developments are frequently the anchors for town and city centre regeneration and are critical to the renaissance of our towns and cities. Shopping centre developments have played a major role in transforming most of our major towns and cities and are now seen as vital to the regeneration of the next level of centres that desperately need investment. They are the vital ingredient to creating prosperous places.

If the main purpose of the new regional strategies is to create economically-successful places, there is little beyond the title that conveys this central message – it is strong on process and procedure, says little about the purpose and content of these strategies and is largely silent about spatial issues: place, cities, towns, communities and neighbourhoods.

BCSC has been concerned that regional strategies – both RSSs and RESs - have been slow to recognise the significance of retailing, retail development, but, even more importantly, the major role played by city and town centres as the main drivers of the regional, sub-regional and local economies. If the main goal is to create economically-successful places, then the importance of securing economically-successful city and town centres should be at the heart of these regional strategies.

Some of the more recent regional strategies have begun to recognise the role of city and town centres as the spatial anchors for economic growth at the regional level. For example, the new RSS for the East of England, explicitly sees certain key centres for development and change (SS3) as the main drivers of economic growth (3.14). (See answer to Question 4 below).

Similarly, the RES for the East Midlands says that “realising the full potential of urban areas: as centres of a significant proportion of economic and social activity, our cities and towns are key drivers of regional economic performance (page 20) and as “centres of economic activity in the region, our cities and major towns are key drivers of regional economic performance.” (p34). “A Flourishing Region – Regional Economic Strategy for the East Midlands 2006-2020” (page 20).

This document – Prosperous Places – is concerned with how economic growth can best be delivered at a regional level. It focuses primarily on “drivers” that underlie productivity and employment, but does not recognise the importance of regional and sub-regional centres as the focus for growth and the drivers of change. Regional economic success is driven by economically-successful city regions which have the main city and town centres as their anchors.

The Government's planning policy of refocusing economic development – such as retail, leisure and office development – in city and town centres has given the development industry the confidence to reinvest in these centres. Over the last ten years there have been major retail developments in almost all our major towns and cities. The Government's policy for town centres – PPS6 – has given a clear focus for investment. This spatial focus is needed in the new regional strategies.

BCSC would, therefore, like the final guidance to have a much stronger spatial dimension which:

- recognises the importance of city regions for sub-regional planning;
- indicates where economic growth and development will be encouraged; and
- recognises the importance of town and city centres as key to the future prosperity of the regions and sub-regions of England. They should be recognised as the main drivers and policies should be focused on making them economically-successful and prosperous places.

I have copied this to the Department of Communities and Local Government.

Yours sincerely,

A handwritten signature in cursive script that reads "Michael Green".

Michael Green
BCSC Chief Executive

Cc DCLG

Consultation Questions

We invite your views on the range of proposals contained in this consultation document. We particularly welcome your views on the following questions.

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?

BCSC has no comments on this issue.

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?

BCSC has no comments on this issue.

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

BCSC has no comments on this issue.

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?

The regional strategy should identify those town and cities which will be the economic drivers of the regional and sub-regional economy, which will be the focus for development, especially housing, employment, shopping, and for regeneration. The RSS for the East of England is a good example, identifying the major cities and towns as:

- Key centres for development and change (SS3)
- Priority centres for regeneration (SS5)
- Strategic employment locations (E3)
- Regional centres for major retail development and complementary town centre uses (E5)

In addition, the RSS also contains a section (13) on sub-areas and key centres for development and change, which, among other things, identifies which centres should be the focus for employment-generating development.

BCSC considers that the new regional strategies should identify which town and cities should be the focus for development and change and, in particular, which centres should be the drivers for growth within the region. This means providing much more of a spatial dimension to the strategies so that they are genuinely about “prosperous places”. From a retail development perspective, BCSC would welcome clear guidance on which city and town centres should be the focus for retail growth as advocated in PPS6: Planning for Town Centres.

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

BCSC has no comment on this issue.

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?

BCSC has no comments on this issue.

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?

BCSC supports the requirement for local authorities to assess the economic conditions of their area. With regard to guidance for planning purposes, good practice guidance to accompany PPS4: Planning for Economic Development would be the appropriate vehicle for advising local authorities how to undertake this task.

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

PPS6 indicates what information and is required to plan for town centres, in particular retail, leisure and office developments, at both the regional and local levels, including the amount of growth that should be planned for. An assessment

of the amount of new retail, leisure and office development should be undertaken for the region or for the sub-regions.

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

A number of these studies could or even should be undertaken at regional or sub-regional level.

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

BCSC considers that there should be scope for private sector bodies, such as BCSC, being involved to assess how realistic the assessments are.

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

Yes .

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

BCSC has no comments on this issue, except that retail needs assessments should be undertaken at regional and local levels to assess how much new retail development is needed at regional, sub-regional and local levels.

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?

Sub-regional partnerships could undertake a range of different analyses to explore the need for new development in the sub-region and where it should be located.

Q14. How would a sub-regional economic development authority fit into the local authority performance framework?

BCSC has no comments on this issue

Q15. Should there be a duty to co-operate at sub-regional level where a statutory partnership exists? To whom should this apply?

BCSC has no comments on this issue