

# RESPONSE PROFORMA

Transforming places; changing lives: A framework for regeneration

## Respondent Details:

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c/o CB Richard Ellis

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Please return by: **Friday 31 October 2008** to:

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Or by hard copy to:

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**Is your response confidential?**

Yes  No

**Comments:**

Provision is made throughout this questionnaire for you to provide additional comments. If, however you wish to provide more detailed comments on any aspect of the consultation then please feel free to append additional materials and supplementary documents, clearly marked and cross referenced to the relevant questions, as necessary.

Organisation type (tick one box only)			
Architects	<input type="checkbox"/>	Neighbourhood Manager	<input type="checkbox"/>
Commercial Developers	<input type="checkbox"/>	Non-Departmental Public Body	<input type="checkbox"/>
Consultancy	<input type="checkbox"/>	Other non-governmental organisation	<input type="checkbox"/>
Housing Association (Registered Social Landlords)	<input type="checkbox"/>	Private individual (unaffiliated)	<input type="checkbox"/>
Individual in practice, trade or profession	<input type="checkbox"/>	Research/academic organisation	<input type="checkbox"/>
Journalist/media	<input type="checkbox"/>	Specific interest or lobby group	<input type="checkbox"/>
Local authority	<input type="checkbox"/>	Third sector	<input type="checkbox"/>
Manufacturer	<input type="checkbox"/>	Trade body or association	<input checked="" type="checkbox"/>
		Other (please specify):	<input type="checkbox"/>

## Questions in Chapter One

**Q1.** Is this analysis right?

**Yes**  **No**

**Comments:** We believe the analysis governing the definition of regeneration is correct. We agree that there is a requirement to distinguish that not all activity that promotes economic development is regeneration per se.

However, it is equally important to note that much economic development does provide a raising of standards, not only in the physical environment, but also within perceptions of an area. This can result in a 'beneficial upward spiral' of regenerative activity, resulting in the overall goal of regeneration.

**Q2.** What further analysis is needed to ensure the needs of different demographic groups are properly reflected in our regeneration priorities?

**Comments:** The definition of deprivation, which in turn, suggests those areas requiring the greatest value add through regeneration and renaissance, covers a wide variety of measures and indices.

These include the obvious deprivation indices, such as unemployment, number of persons per habitable room etc., but should also include other factors which may suggest a requirement for wider regeneration, such as access to services and facilities and access to public transport links.

In this way, a broad assessment should cover the requirements and needs of different demographic groups, according to their mobility, and focus on developing measurable solutions which are locally targetted to the specific requirements of each demographic group.

## Questions in Chapter Two

**Q3.** Are the outcome measures proposed helpful? Will they ensure regeneration benefits the poorest people and places in society?

Yes  No

**Comments:** The outcome measures proposed are helpful and it is certainly the case that a new success criteria which focusses on outcomes, rather than outputs, provide a sensible basis for regeneration aspirations.

However, the table which defines consultation questions which seek to measure progress should, in our view, be extended to encompass expressed 'satisfaction' arising from regeneration proposals.

We appreciate this may require additional research and/or survey. However, clearly an individual's perception on the success or otherwise of a scheme can assist in defining, in turn, the overall qualitative success of a regeneration area.

**Q4.** Have we proposed the right measures?

Yes  No

**Comments:** Please see above.

**Q5.** Should we measure the scale and rate of private investment in deprived areas, and how could we do so?

Yes  No

**Comments:** We do believe that the scale and rate of private investment in deprived areas should be measured and a method by which this could be achieved could be the level and award of building contracts.

However, we are very mindful of the Government's approach within the document to measure 'outcomes' rather than 'outputs'. Clearly the measuring of scale and rate of private investment in private areas could fall into either category and it is important to establish that any such 'outcome' is not simply delivery of private sector investment, but rather specifically targeted private sector investment which achieves social, as well as physical regeneration. Indeed the document itself recognises that not all economic development achieves 'regeneration' so the use of this measure should, in our view, be used with a degree of caution.

**Q6.** What can central Government do to give communities a stronger voice in shaping regeneration? How can other agencies help?

**Comments:** It is important to establish, in our view, a process of devolution through far wider additional consultation which involves communities and other key stakeholders decision makers within an area.

Government agencies can help, primarily through the local authority in the first instance, through targeted workshops and meetings which involve the community and others which may have an interest within an area.

BCSC would welcome the opportunity to take part as a key stakeholder in both town centres and retail-led employment as part of any such enhancement to community involvement. This will help ensure that town centre led regeneration likely to facilitate the most sustainable of job opportunities is targeted and prioritised. As part of this, BCSC could also help advise on both the nature and form of regeneration which takes place, and the socially excluded groups that should be targeted.

**Q7.** What else can we do to ensure regeneration is responsive to environmental change?

**Comments:** By its very nature, regeneration needs to be responsive to all changes. The only solution in this respect is to ensure that regeneration strategies are reviewed continually to respond, not only to environmental changes but to changes in the market place and socio-demographic changes within the area in which the regeneration is targeted.

**Q8.** How can we further strengthen sub-regional partnerships to deliver regeneration outcomes?

**Comments:** Sub-regional partnerships can and should be involved in far greater levels in the planning and development process for regeneration through the provision of strategic policies and regional spatial strategies which, in turn, should be set out in the Regional Spatial Strategy (RSS). This then needs to feed effectively into the relevant local authority's Local Development Framework (LDF) through specific policies within regeneration areas with priorities given to short, medium and long term regeneration solutions at targeted locations.

Neither the RSS nor the LDF should be seen as a 'pickling in aspic' however and should be flexible to respond to changes in regeneration priorities brought about by social, economic and environmental changes.

## Questions in Chapter Three

**Q9.** Is the criteria based approach a helpful way of ensuring greater consistency in prioritising regeneration investment?

Yes  No

**Comments:** Yes: the criteria based approach is the best way of ensuring greatest consistency in prioritising regeneration investment. We agree this will provide a more effective way of measuring those who will benefit from regeneration across the country on a consistent basis.

**Q10.** Should we ask regions to develop regional regeneration maps? What are the disadvantages of that approach?

Yes  No

**Comments:** Regional regeneration maps may have advantages in setting out the priorities within each region or sub-region of the regeneration requirement and opportunities which may exist. However, in order for them to be effective, there needs to be an agreed data set to advise and inform such maps, without which there will not be the required consistency of approach which we welcome (above).

**Q11.** Should we go further? What else can be done to align national Government investment behind local and regional priorities?

Yes  No

**Comments:** Consistency of approach, set out in question 9 and 10 (above) will do much to promote consistent regeneration. We therefore offer no further comment on this issue.

**Q12.** Will this approach give the private sector confidence and unlock long-term investment? If not, what would?

Yes  No

**Comments:** The approach set out above and within the document will provide an opportunity for enhanced regeneration activity and consistency across regions. However, this does not necessarily guarantee private sector confidence and, in turn the unlocking of long term investment and regeneration potential per se. The answer to what will, is a complex one. It is clear that an open and transparent planning system, coupled with the willingness and the mobility of resources both in the public and private sector can assist, but clearly if the proposals are to be measured on outcomes rather than outputs, social and environmental wins are required as well as simple investment and physical economic development.

**Q13.** If there is a case for central government still identifying some specific neighbourhoods and targeting particular assistance at them in future in order to learn lessons, as we have done with NDCs?

**Comments:** We consider that there is a case for, in particular cases, the Government identifying specific neighbourhoods and targeting particular assistance. This approach not only generates deliverable and measurable regeneration 'wins' but also provides templates for regeneration strategies elsewhere.

#### Questions in Chapter Four

**Q14.** Taken together, do these new and enhanced roles for different agencies equip them to deliver the expectations in the framework?

Yes  No

**Comments:** The new and enhanced approach for the different agencies set out a positive framework for further delivery of regeneration. However these should not be prescriptive.

Regeneration strategies within different areas respond to, in many cases, a specific set of circumstances and there cannot be a 'one size fits all' prescription from the various bodies and their response to regeneration.

Therefore, while the framework does in our view assist in a sensitive approach, it is important to emphasise, as part of any further agreement of this, that such agencies should be open to flexibility in their application and that this may extend beyond the role suggested.

**Q15.** What would be the costs and benefits of this approach?

**Comments: No comment.**

**Q16.** How should this framework be implemented in London given London's unique governance arrangements?

**Comments:**

**Within London there will be a need to involve both GLA and the LDA as part of any regeneration initiative and process. However, clearly London itself at a micro-level, has extremely pockets of deprivation. There is therefore clearly a need to involve London boroughs themselves in any framework for regeneration.**

**Q17.** What would be the impact of this approach on different groups, according to:

- gender and gender identity;
- disability;
- race;
- age;
- religion/belief; and
- sexual orientation

**Comments: No Comment**

**Further Information**

We would be grateful if you could provide us with the following information to feed into the full Impact Assessment:

How are the regeneration priorities, you deal with, currently decided? Are these communicated clearly?

BCSC, as an organisation, is involved as a stakeholder and supporter of town centre regeneration options, on an ad hoc basis.

How much time do you currently spend on negotiating regeneration priorities?

BCSC are involved in strategic level discussions on regeneration only, with detailed levels of negotiation usually falling to the relevant developer associated with the proposal.

To what degree is the local community in your area engaged in this process?

Not applicable.

What would be the likely cost of doing this if it is not done already?

Not applicable.

What analysis do you currently undertake to support regeneration policy?

BCSC publishes frequent research and analysis on the contribution to town centre regeneration from both private and public sectors and the importance of retail-led regeneration and training initiatives.

Are the analytical proposals in the Framework additional to what you are currently undertaking?

Yes, and BCSC would welcome such further stakeholder involvement.

Will the proposals set out in the consultation document lead to a more focussed approach?

Yes.

And better value for money? If so, how?

No comment.