



RTPI

mediation of space · making of place

Royal Town Planning Institute
41 Botolph Lane
London EC3R 8DL
Tel +44(0)20 7929 9494
Fax +44(0)20 7929 9490

Email online@rtpi.org.uk
Website: www.rtpi.org.uk

Registered Charity Number 262865
Patron HRH The Prince of Wales KG KT PC GCB

The Policy Team
Welsh European Funding Office
Welsh Assembly Government
Cathays Park
Cardiff CF10 3NQ

Our ref. WPPP06-09
5 October 2006

Dear Sirs

Consultation on the Convergence Programmes 2007 - 2013

I am writing in response to the above consultation paper.

The consultation paper has been considered by the Welsh Planning Policy Panel of the Royal Town Planning Institute in Wales .

Please find enclosed a copy of our response in the form of a Memorandum of Observations. We have no objection to them being made publicly available.

Yours sincerely

Owain Wyn
Cynghorydd Polisi Cynllunio Cymru/
Welsh Planning Policy Adviser

Tel: 01286 662904
E-mail: welshpolicy@rtpi.org.uk

Enc.

THE ROYAL TOWN PLANNING INSTITUTE
CONSULTATION ON THE WEST WALES AND VALLEYS
CONVERGENCE PROGRAMMES
2007 - 2013

Memorandum of observations to the Welsh Assembly Government on the
consultation paper

October 2006

GENERAL COMMENTS

1. The Royal Town Planning Institute (RTPI) is the professional body chartered to “advance the science and art of town planning in all its aspects, including local, regional and national planning, for the benefit of the public.” It is the professional body for some 20,000 chartered town planners (with over 900 members in Wales) who work in a wide range of public and private bodies with development interests. As well as being the professionals most involved in the statutory processes of planning, our members are also engaged in a range of other activities including economic development, transport, housing and the protection and enhancement of the environment.
2. The RTPI welcomes the launch of this consultative paper on the programme for West Wales and the Valleys, and looks forward to a continuing dialogue in advancing this agenda. It is noted that East Wales will qualify for a new Regional Competitiveness and Employment Programme, resources for which are yet to be agreed, and that Wales will also continue to participate in a successor to the INTERREG cross-border programme with Ireland, as well as the Atlantic Area and North West Europe trans-national programmes. The RTPI also looks forward to contributing to the development of these programmes, the allocations for which, we understand, are yet to be determined.

SPATIAL PLANNING AND STRATEGIC FRAMEWORKS

3. We welcome the increasing recognition in Wales of the role that spatial planning has to the making and shaping of place. The Consultation Document’s recognition of this critical role, and in its function in providing the overall framework for collaborative action in all parts of Wales is therefore to be welcomed. The document notes that this activity extends beyond the scope of statutory land-use planning. Whilst we fully support that viewpoint we also stress that it is necessary to recognise that the substantial part of the programme which involves the development and use of land and buildings, including the delivery of transport infrastructure, will need to be delivered through the statutory development planning and transport planning systems.
4. The emphasis on developing more strategic approaches to project delivery, through the development of Strategic Frameworks, is to be welcomed. The interfaces, therefore, between the programme and its Strategic Frameworks, the Community Strategy, existing Unitary Development Plans and Local Transport Plans, and the emerging Local Development Plans and Regional Transport Plans, will be critical to the successful delivery of the programme, and should be recognised in the document. It will be important to establish linked working arrangements which ensure that these interfaces operate as smoothly as possible.

THE CONSULTATION QUESTIONS

Do you agree with the overall vision?

5. We welcome the proposed vision, with its recognition of the strong complementary relationship between economic and environmental policies. However, a key interface between those policies lies in the field of transport, and we suggest that a reference within the vision to

transport and the Wales Transport Strategy should be included. The importance of decoupling economic growth from increasing demands on the environment is recognised in the document. This could be explicitly captured in the vision, and particularly the need to decouple economic growth from road traffic growth. The vision could also embrace the need to narrow the gaps between those with a high quality of life, and those less fortunate. Finally, as we stressed in our initial comments we particularly support the importance put in the vision on local distinctiveness within the different parts of Wales.

Chapter 1: The Analysis – Do you agree with the analysis of strengths, weaknesses, opportunities and threats facing the region?

6. We broadly support the analysis. However, we would argue that the increasingly effective arrangements for delivering spatial planning in Wales, and the developing arrangements for sub-regional collaboration through a range of partnerships, is a specific strength and should be identified as such. We welcome the identification as an opportunity of the need to improve public and business awareness and skills on key environmental issues. This could, however, go further in recognising the existing strength of collaboration between the professions involved in advancing economic and environmental regeneration through the Regeneration Skills Collective.

Chapter 2: The Strategy – Do you agree with the Strategy?

7. The strategy represents an effective response to the challenges facing West Wales and the Valleys. We welcome in particular the emphasis on developing actions to promote economic development within the context of the broader strategic agenda embracing environmental improvement and social justice, in line with the Wales Sustainable Development Scheme. Similarly, the linkage to the effectiveness of public service delivery, and the “Delivering the Connections” agenda, is particularly significant.
8. We believe that the strategy needs to be strengthened to include greater focus on the role of town centres throughout the Convergence area. As focal points for local communities throughout West Wales and the Valleys, they often embody key components of local distinctiveness, and represent concentrations of business activity, economic and leisure opportunities, and public services, in accessible locations. Moreover, many of these communities have failed to see the retail investment in their town centres which has been the norm in more prosperous locations. As a result, there is a massive outflow of expenditure, and the economic activity and jobs that it generates. The retail industry needs to be seen as part of the solution to these problems, and the programme needs to be able to create a business environment within town centres where the retail industry is keen to invest. The strength of effective town centres is their ability to accommodate a mixture of business and other activities within close proximity. The new programme will need the flexibility to facilitate investment in mixed use schemes.
9. We also believe that the importance of the tourism industry needs greater recognition in the strategy. Given the significance of this industry to the economies of West and North Wales, and its potential in The Valleys, it merits particular attention. It also has a distinctiveness as an industry in terms of the convergence programme, in that its success is innately dependent on many other aspects of the programme, in terms of skills, business support, transport, public facilities and services, and the quality of the natural and built environment.

Do you agree with the aims and objectives for programmes?

10. The document takes forward the Lisbon agenda, and in particular the need to foster business growth. It recognises that economic development needs to occur alongside improving the quality of life by advancing social justice and improving the environment. As such, we broadly support the objectives.

Do you agree with the monitoring and evaluation strategy?

11. The document proposes to focus primarily on a number of high level economic indicators. It also recognises, however, the need for social cohesion and sustainable development indicators. Accordingly, accessibility to jobs and services should be included as one of the

programme's high level indicators. Other indicators which could valuably be added include energy use, carbon emissions, commercial and industrial property vacancies, and levels of derelict and contaminated land.

Do you have any views on what the themes for innovative actions and for trans-national activities might be for ERDF and ESF programmes?

12. We welcome the identification of the potential for dedicated funding for innovative actions. Key target areas for such funding should be actions which can contribute to economic growth, but which are particularly environmentally sustainable. Key opportunities could include the interface between land-use and transport planning, and the interfaces of land use planning with resource use, energy, waste and planning of the air and marine environments. Greater inter-professional collaboration, through mechanisms such as the Regeneration Skills Collective, could also have considerable potential in this regard.
13. With reference to trans-national activities, the potential to link the programme with WAG's new International Sustainable Development Strategy should be explored.

Chapter 3: Priorities - Do you agree with the focus of the priorities?

14. ERDF Priority 1 focuses on promoting economic growth through improving knowledge and innovation. With regard to this priority, the comments on tourism above (para 9) are particularly relevant. We support the inclusion of construction amongst the industrial sectors noted as being important for economic growth. However, it is important to stress that the success of the construction industry is dependent on a range of skills, including planning, within the Professional and Business Services Sector, which deal with regeneration, the built environment, and transport, and without which the construction industry cannot operate. These sectors also need to be recognised as important for economic growth. Similarly, the role of house building, and housing repair and maintenance as key sectors of the economy, and key contributors to economic growth, also needs to be recognised. There will be a need for integrated thinking involving the use of Convergence Programme funding, and funding through other mechanisms such as housing programmes. The programme needs to be able to create a business environment throughout the Convergence area where the housing industry is keen to invest. The identification of sectors and clusters which can make a strong contribution to the development of a sustainable economy is particularly welcome. Again, the professional skills and the housing industry referred to above, can play a significant role in this regard.
15. ERDF Priority 2: Creating an Attractive Business Environment, incorporates a wide range of activity which will contribute to business success. This includes sustainable transport, waste management and energy, the potential contributions of the environmental goods and services and ICT sectors, and initiatives to tackle climate change. This Priority is of crucial significance to the programme as a whole, and merits particular support. The document needs to be strengthened, however, by a recognition of the need, in certain cases, for key investments to happen beyond the Convergence Zone boundaries. It should also be made clear, and this relates also to ERDF Priority 3, that investment in economic development will be supported primarily where it can be located to minimise the generation of road traffic.
16. ERDF Priority 3: Building Sustainable Communities contains two themes. The first, Physical Regeneration, recognises the importance of physical improvements to deprived urban areas. The comment above (para 8) on the role of town centres is particularly relevant to this Priority. The focus given to the needs of the upper valleys is to be welcomed. It is important to stress, however, that many of that area's problems are shared with the mid valleys area, and unified frameworks which address the needs of both together will be needed. This theme could be strengthened by an explicit recognition of the importance of investment in the quality of the public realm in these deprived communities. An integrated approach to the design of buildings, spaces and infrastructure, which conserves the character, distinctiveness and heritage of localities, and meets high standards of urban design, is required. In many areas, and in accordance with WAG planning policies, new sites and premises will be dependent on progress with the reclamation of derelict and contaminated land. It is important that the new programme helps to reverse the recent decline in WAG funding for land reclamation and remediation.

17. We particularly welcome the recognition of the need to take a strategic approach to the regeneration of these areas. Local regeneration strategies will need to interface effectively with the Local Development Plans and Regional Transport Plans which are currently under preparation.
18. A key challenge in taking a strategic approach to local regeneration in these areas is the capacity and capability of the local communities, their businesses and local authorities, to tackle the scale and intensity of their needs. Developing this capacity and these capabilities will be the ultimately determine the long term sustainability of regeneration in these areas. Initiatives to do so will need strong support from this new programme. It is to be hoped that, in tackling these issues, the new programme draws heavily on the conclusions of the Wales Audit Office's recent publication "Regeneration – A Simpler Approach for Wales".
19. In seeking to make these areas better places to live, and this applies in particular to the valleys, we believe it is important to recognise the role of schools. This applies not only in terms of the abilities of the next generation of adults. The quality of schools is a key factor in influencing the decisions of young families on whether to move into, or remain living within, these areas.
20. The second theme in ERDF Priority 3 focuses on the development of the social economy. We welcome this focus as a way of providing opportunities to support social enterprises, such as local development trusts and community transport services.
21. ESF Priority 1: Increasing Employment and Tackling Economic Inactivity focuses on employment centred issues. In seeking to tackle economic inactivity, it would benefit from addressing the inaccessibility to job opportunities in parts of the Convergence area as a barrier to raising activity rates.
22. ESF Priority 2 addresses the need to develop skill levels amongst the workforce. Construction is identified as one of the industrial sectors which is important for economic growth. However, its success is dependent on a wide range of skills, including planning, which deal with regeneration, the built environment, and transport. Skills gaps and shortages within these activities are particularly evident. A key challenge will be enhancing the workforce skills of the local communities, their businesses and local authorities, to tackle their regeneration needs. It is to be hoped that the Regeneration Skills Collective, which links the relevant professions including the RTPi, will be able to play a role in advancing this priority.
23. ESF Priority 3: Making the Connections – Modernising and Improving the Quality of our Public Services is particularly to be welcomed, It emphasises the role of collaborative working, encompassing the public, private and voluntary sectors in the delivery of public services. It focuses on developing the skills of the public services. The comments made in para 22 above are therefore equally relevant to this priority.

Do you agree with the proposed priority level indicators?

24. We would reiterate our comments made on indicators in para 11 and ask that these be also taken into account in developing indicators at priority level.

Chapter 4: Cross-cutting Themes – Do you agree with the proposed objectives and approach to mainstreaming equal opportunities and environmental sustainability within the programme?

25. We welcome the mainstreaming of equal opportunities and environmental sustainability. Ultimately, the programme must be able to demonstrate that it is enabling economic development in ways that narrow the gaps between the more and less fortunate in our society, and in ways which advance environmental sustainability. Of the six environmental sustainability objectives listed, all are material to the land use and transport planning systems in Wales. These systems will have critical roles in ensuring that the programme succeeds in mainstreaming sustainability.

Chapter 5: Implementation Arrangements: Do you agree with the proposals for the broad allocation of resources?

26. The European Council has committed at least 60% of Convergence Funds to the Lisbon objectives for sustainable economic development. WAG proposes to go further by earmarking 65% for these purposes. In comparison with the current objective one programme, the proposals suggest an increase in resources for research, development and innovation, entrepreneurship, ICT, employment and skills, transport, and environmentally friendly technologies. While all of these activities merit support, there is a strong case for prioritising the Physical Regeneration theme in ERDF Priority 3. We are disappointed that the document appears to be proposing a reduction in funding for regeneration. As recognised by the Wales Spatial Plan, the ultimate determinant of the long term sustainability of the communities in the Convergence area is their ability to become attractive places to live and work. Reducing funding for regeneration is clearly incompatible with this fundamental proposition, and needs to be reconsidered.
27. The Lisbon Strategy recognises sustainable transport investment as a critical factor in sustainable economic development. In prioritising these activities, the consultation document proposals are to be welcomed. However, the full range of resource efficient modes of transport needs to be prioritised, including bus services, cycling and walking, as well as rail and waterways.
28. ESF Priority 3, which seeks to improve the quality of public services, is a new priority in comparison with the objective one programme. However, resources for this priority are proposed to be small in comparison with the other priorities. As it could make a fundamental difference to the public services which support economic activity, the funding available needs to be sufficient to tackle the scale of the challenge.

Do you agree with the proposals for strengthening strategic implementation?

29. The document proposes in comparison with objective one, that there should be fewer projects, but with deeper evidence-based interventions. More emphasis on sub-regional collaboration is proposed. The arrangements for the Wales Spatial Plan are expected to provide a framework for action and decision making, with the Spatial Plan Area Groups playing a primary role. A key device for strengthening the strategic focus of the programme is the development of Strategic Frameworks, which will link a number of projects designed to achieve linked strategic purposes. These principles give added focus to the role of strategic spatial planning in the delivery of the programme, and are to be welcomed.
30. It is noted that comments have now been invited by the end of October on the further information on Strategic Frameworks which was presented to the External Stakeholders Group on 28th September. Further consideration will be given to this question in the light of that information.

Do you agree with the proposals for technical assistance?

31. The document proposes that 1.4% of the funding will be available for technical assistance, to meet the costs of key support activities, including programme management, capacity enhancement at the regional level, and mainstreaming good practice. We support the way that these proposals will help to facilitate engagement with the programme.

Do you agree with the proposals for the Programme Monitoring Committee (PMC)?

32. The document proposes a simplification of programme monitoring arrangements, with a single PMC to cover both the Convergence and Competitiveness programmes. It also seeks views on its membership. There is merit in simplifying the monitoring arrangements. However, given the critical role which spatial planning is expected to play in the programme, we would argue that there is a strong case for the PMC to include members with a background in spatial planning.

OW/MB
05.10.06