

Sustainability East
Eastbrook
Shaftsbury Avenue
Cambridge
CB2 2DF
Tel: 01223 533481
E-mail: chrissie.pepper@goeast.gsi.gov.uk
Web: www.sustainabilityeast.org.uk

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

20 June 2008

Dear Sir / Madam

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

Please find attached the response of Sustainability East to the consultation 'Prosperous Places: Taking forward the Review of Sub-National Economic Development and Regeneration'.

Sustainability East is the East of England's independent sustainable development champion. We bring together experts from across the region to bring sustainable development to the heart of policy making in the East of England. We do this by carrying out critical analyses of policy instruments and spending programmes and acting as 'critical friend' to regional bodies whose decisions impact significantly on the economic, environmental and social development of the region. We also promote debate on sustainable development issues and, where appropriate, commission research to support better evidence-based debate and policy-making.

The response reflects our independent collective view, but not necessarily that of all the organisations from which our members are drawn, many of which are also responding separately.

If you would like to discuss our views in more detail, please contact chrissie.pepper@goeast.gsi.gov.uk / 01223 533481

Yours Faithfully



Richard Powell
Chair
Sustainability East

“Prosperous Places: Taking Forward the Review of Sub National Economic Development and Regeneration”

Response to consultation: Sustainability East

SUMMARY

Sustainability East recommends that, if the proposals in “*Prosperous Places*” are taken forward:

- A. Regional Development Agencies should be subject to an overriding statutory duty to promote sustainable development (SD) and held to account for their performance of this duty;
- B. the composition of RDA Boards, and the performance framework to which they are subject, should be reviewed to achieve a proper balance between economic, social, environmental and resource use objectives;
- C. Government should insist on effective involvement of stakeholders (“SEEPs”) in developing strategy at regional level and monitoring RDA performance, subject to regional discretion as to the mechanisms, and should establish minimum good practice standards for stakeholder engagement;
- D. Integrated Regional Strategies should be set firmly within a SD framework, and required to make explicit links to SD principles and objectives;
- E. further consideration is required of how the necessary role currently performed by regional SD champion bodies (“round tables”), of promoting SD and acting as independent “critical friend” to regional agencies and local authorities should be delivered and enhanced within the new framework.

DETAILED COMMENTS

1. This is Sustainability East’s response to consultation from central Government (BERR and CLG) about “*Prosperous Places: Taking Forward the Review of Sub National Economic Development and Regeneration (SNR)*”, dated 31 March 2008. The response reflects our independent collective view, but not necessarily that of all the organisations from which our members are drawn, many of which are also responding separately.

2. Sustainability East is an independent champion body which promotes sustainable development (SD) in the East of England by bringing together people with relevant experience and expertise from across the region and across disciplines to explore issues, challenge current practice, raise awareness, change perceptions, and act as “critical friend” to regional bodies in the integration of economic, environmental and social policies. Unlike some regional SD champion bodies, Sustainability East is not organisationally linked to the Regional Assembly (EERA), so the structural changes proposed in “*Prosperous Places*” do not directly impact on our functioning. We want to continue to use our expertise and experience of working across sectoral boundaries to contribute to delivery of SD in the East of England, but the proposed changes – in structures, governance, accountability, and objective-setting for regional agencies – could have a fundamental impact on our ability to do so.

3. We have seen the response dated 14 May from the Sustainable Development Commission (SDC) and agree with it. This response focuses mainly on issues where we can add to the SDC’s response from a specifically regional perspective. We have also seen and had the chance to comment on the response being developed by the East of England Regional Partnership Group (the “*East of England Response*”) and endorse much of its content, especially the commitment to use the opportunities presented by the SNR to improve the

quality of life for people within the region and deliver positive social and environmental outcomes.

4. Sustainability East is keen to respond constructively to “*Prosperous Places*”. We are already in discussion with EEDA, EERA, GO-East and other regional stakeholders about how to ensure that – if the SNR proposals are implemented – the principles of SD can be effectively embedded in any new regional governance structures for the East of England and the new Integrated Regional Strategy.

5. We welcome the improvement (noted by the SDC) in the language of “*Prosperous Places*”, and the recognition of wider aspects of SD, compared with the original SNR. Taken in isolation, we especially welcome the statement in paragraph 4.5 that:

“The [new integrated regional] strategies will contribute to ... sustainable development in the UK and will be underpinned by sustainable development principles. Taking this integrated approach to agreeing social, economic and environmental priorities in each of the regions will help create the conditions for the economy, business and communities to flourish and the environment to be protected.”

We also welcome some of the detailed proposals, notably increased delegation of delivery of economic development and regeneration – set within a broad SD framework – to sub-regional and local level.

6. Nevertheless, we retain serious concerns about some of the proposals in “*Prosperous Places*”. The central proposal - that RDAs (accountable mainly to Government, and with a specific economic delivery remit) should take on regional planning functions from RAs (which for all their faults are more or less representative and don’t approach their task from a specifically economic, environmental or social perspective) – is bound to arouse suspicion that Government wants economic objectives to be given not just more, but disproportionate, weight in the planning process, at the expense of the environmental and social dimensions of SD. Counter-balancing safeguards need to be put in place to overcome this suspicion (whether justified or not). Our specific concerns can be summarised as:

- Most importantly, the apparent primacy given to economic development over other objectives;
- Lack of consideration for how the proposals will support the Government’s SD policies set out in “*Securing the Regions’ Futures*”;
- Failure to reflect the full environmental and social dimensions of SD;
- The proposal that RDAs should remain “business-led” when they take on the regional planning role, which involves balancing the needs of business against other policy objectives;
- The proposal that BERR should retain lead responsibility for RDAs’ accountability to Parliament and the public;
- Lack of detail about the proposed performance framework for RDAs;
- Lack of clear provision for stakeholder involvement at regional level;
- Proposed power for Government to amend IRS unilaterally after submission;
- Whether a “representative” LA Leaders’ Forum as proposed – potentially excluding some LAs from direct involvement - can work;
- Potential conflict between the LA Leaders’ Forum, Regional Select Committee, and Regional Minister, especially if under different party control;
- Lack of clarity about the relationship between the proposed new statutory duty on LAs to assess local economic conditions, and other LA powers and duties relevant to SD.

We expand on these concerns below. Annex A sets out our responses to the specific consultation questions.

7. Our comments derive from experience in the East of England. In so far as the Government plans to impose a uniform national model, they constitute recommendations to change that model. We recognise that regions differ: less prosperous regions may legitimately give higher priority to economic growth, and experience of the working of the current system – especially the role of RAs – has elsewhere been less positive than here. We therefore welcome the Government’s willingness to allow regions some enhanced flexibility in designing new structures and are keen to be an active agent in developing the best arrangements for this region.

Primacy given to regional economic development objectives

8. We recognise that the original SNR was a review of economic development and regeneration. However, many of its recommendations would affect delivery of SD much more broadly. We welcome the attempt in *“Prosperous Places”* to address some of these broader issues. Nevertheless, it is apparent at many points throughout *“Prosperous Places”* that economic growth is still seen as the paramount objective, with the social and environmental dimensions of SD perceived as constraints rather than as objectives of equal importance. There is no recognition that further economic growth may be inconsistent with other priorities. The proposals for the scope of Integrated Regional Strategies in para 4.13 are especially narrowly focused, with no mention of quality of life and environmental constraints to growth: see our response to Q4 below.

9. By contrast, *“Securing the Future”* – which remains Government policy – treats the five principles of SD – living within environmental limits, ensuring a strong, healthy and just society, achieving a sustainable economy, promoting good governance, and using sound science responsibly – and the four agreed priorities that flow from them – sustainable consumption and production, climate change and energy, natural resource protection and environmental enhancement, and sustainable communities – as of equal importance.

10. We are not hostile to economic growth as such, recognising the scope it offers to lift people out of poverty and improve public services and individual health and well-being. However, we believe that the balanced approach in *“Securing the Future”*, recognising the equivalence of economic, social, environmental and resource protection objectives which is at the heart of SD, commands public support in the East of England; and we would wish to see it incorporated as the proposals in *“Prosperous Places”* are implemented.

Lack of integration with *“Securing the Regions’ Futures”*

11. *“Prosperous Places”* – in contrast with the original SNR – makes frequent reference to sustainability, which is welcome; albeit commonly using the phrase *“sustainable economic growth”*, which arguably begs the question whether further growth can be made compatible with environmental and social sustainability. However, given that the document is not just about regional and local economic development, but also proposes major changes in the governance structures of the English regions, there is strikingly little reference to how the proposed new structures will assist delivery of environmental, social and resource protection objectives. In particular, SD does not feature explicitly in any of the consultation questions on p 12 – 13 (which explains the difficulty we faced in framing our response in terms of those questions). This reinforces the impression that growth is seen as the priority, with references to other aspects of SD being at best an acknowledgement of possible limits to growth, at worst mere window-dressing. We **recommend** that in taking forward *“Prosperous Places”*, especially in developing RDAs’ performance framework and in guidance on developing Integrated Regional Strategies, explicit links should be made to the SD principles and objectives set out in *“Securing the Future”* and *“Securing the Regions’ Futures”*.

Reflecting the full environmental and social dimensions of SD

12. *“Prosperous Places”* makes frequent reference to the need for climate change mitigation and adaptation, in terms which we would broadly support. However there is hardly

any mention of other environmental issues: only a passing reference to water supply and waste in para. 4.13, and nothing on biodiversity, air and water quality, landscape, or the built environment. A much more positive approach is needed, to include not only living within environmental limits, but also the benefits that a healthy environment offers for its own sake and for economic growth, social cohesion and quality of life, particularly for more disadvantaged citizens of the region.

13. The social dimension is similarly neglected. There are references to regeneration, though this seems to be conceived mainly in terms of business growth and job creation rather than physical regeneration and community development. The need to meet targets for housing supply and affordability features prominently in paras. 4.9-10. The document is however silent about relief of poverty, social justice, community cohesion and public health. Indeed the Ministerial foreword contains the remarkable statement that: *“Tackling disadvantage remains a core objective for this government, but in the new economy this will be important as much for reasons of national prosperity as for individual fulfilment”*, suggesting that lifting people out of poverty is of value not as an entitlement for the individual in a prosperous society, but only in so far as it is instrumental in facilitating economic growth. Helping to address deprivation and social exclusion, and promote equity and social cohesion, should be seen as central objectives of the reforms.

14. Our **recommendation that RDAs should be subject to – and accountable for - an overriding statutory duty to promote sustainable development** (as defined in *“Securing the Future”*) would help to address the concerns set out in paras 8 – 13 above.

“Business-led” RDAs to take on the regional planning role

15. The key structural proposal in *“Prosperous Places”*, carried forward from the SNR, is that Regional Assemblies (RAs) should be abolished, and their role of developing Regional Spatial Strategies transferred to Regional Development Agencies (RDAs). We have separate concerns about the implications for stakeholder representation of abolishing RAs – see paras 21 – 23 below. However, assuming that RAs are abolished and their planning role transferred, we doubt whether RDAs as now constituted are equipped to take that role on.

16. RDAs were set up in 1999 mainly to promote regional economic development. “Business-led” boards – that is, with a majority of members from a business background – were seen as necessary to bring the requisite skills and motivation to bear on this objective. *“Prosperous Places”* makes clear that RDA boards would remain “business-led” when they take on the regional planning remit (para. 3.5). Paragraph 3.5 goes on to refer to consultation with SoS CLG to secure the right mix of skill and experience.

17. This seems to us misconceived. The main purpose of Regional Spatial Strategies is not to “deliver growth”; nor should that be the purpose of Integrated Regional Strategies. It is, or should be, to promote sustainable development, and balance conflicting objectives and interests. “Business-led” boards may not be well equipped to perform this essentially policy-making function, and will risk being – or being seen to be – supportive of growth and the interests of business at the expense of other objectives. We **recommend** that – if the transfer of planning functions proceeds – RDA Boards should be reconstituted to give a stronger voice to social and environmental perspectives. RDAs should ensure that all board members receive appropriate training and support to develop their SD remit, and should be required (as all or most now do) to appoint one member of the Board with a specific role as SD champion, who should also be a member of the regional SD champion body (or its replacement) to ensure effective and open communication.

Accountability of RDAs to Parliament through BERR

18. *“Prosperous Places”* proposes – without supporting argument – that RDAs should remain accountable to Parliament through SoS BERR (though we recognise that CLG, Defra

and other Departments would participate in setting their performance framework. This reinforces the perception that economic development is still seen by Government as RDAs' prime objective, and appears at odds with the commitment (p7) that new integrated regional strategies will be "*underpinned by the principles of sustainable development*". RDAs' new planning remit has a higher public and political profile than their economic development role and – alongside the IRS – is likely to become the main focus of accountability. As "*Prosperous Places*" acknowledges (para. 3.3), the new role will require RDAs "*to play a significant role in relation to how economic, social and environmental issues are balanced through the planning system*" – currently the responsibility of LAs, Regional Assemblies and SoS CLG, with Defra and other Departments also closely involved. We are not convinced of the rationale for leaving BERR in the lead sponsorship role; given the primacy of the strategic planning function in delivering SD, we **recommend** that – if the transfer of those functions proceeds – RDAs' primary accountability should be through SoS CLG, with clear public arrangements to involve BERR, Defra and other Departments on issues for which they are responsible.

Lack of detail about planned objectives and targets for RDAs

19. This aspect has been well covered in the SDC's response to consultation, which we endorse, in particular their comments that:

"This overarching emphasis on GVA growth [in the original SNR] is in conflict with the Government's aim to provide the basis for regional strategies which integrate economic, social and environmental considerations. ... The single growth objective threatens to demolish this carefully constructed, but fragile and still evolving, framework. In our view, if RDAs are measured solely in terms of increased GVA per head, then sustainable development will become largely irrelevant at the regional level and directly conflict with the aspirations of local government policy."

20. In particular, RDAs' existing rather weak statutory SD objective – "*To contribute to the achievement of sustainable development in the UK where it is relevant to its area to do so*" needs to be strengthened, and – as we **recommend** in para. 14 above – be replaced by a duty to promote SD. rather than subordinated to an "overarching growth objective". RDAs' performance framework in support of this duty needs to be subject to further public consultation, to ensure effective accountability – to Government and within the region – for how they fulfil that duty.

Lack of provision for stakeholder ("SEEP") involvement

21. In proposing abolition of existing Regional Assemblies, "*Prosperous Places*" sets out in some detail planned arrangements for the collective representation of LAs at regional level through the proposed new "LA Leaders' Forum"; but is surprisingly silent about what should replace the other key element in RAs, the representation of regional stakeholders ("social, economic and environmental partners" or "SEEPs") through Community Stakeholders' Groups accounting for around a third of RAs' membership. The only references are in paras 3.22-3 and 4.22-3.

22. We see the role of stakeholders as much broader than scrutiny, involving also an input into strategy development, governance and accountability. This is a key aspect of the "good governance" principle in "*Securing the Future*". We understand that current arrangements for involving stakeholders via RAs may have worked less well in other regions than in the East of England. Nevertheless any curtailing of stakeholder involvement will lead to a loss of accountability and of "ownership" as well as omitting those perspectives that are not effectively represented by politically led LAs. Moreover the proposal (para. 3.23) to give RDAs discretion over the arrangements risks allowing them to sideline troublesome stakeholders with unwelcome views. We should stress that we do not believe that EEDA is seeking to do this, and we welcome the proposals for stakeholder engagement being developed by the East of England Regional Partnership Group. Nevertheless it remains a cause for concern that such engagement would be wholly at RDAs' discretion.

23. We see ourselves and other regional SD champion bodies as having a continuing role in this, and are already in discussion with EEDA, EERA and Go-East as to how this should develop. However, Sustainability East is not a representative body, and is not designed to take part in governance: doing so would compromise our ethos of independence and role as “critical friend”. We **recommend** that, if Assemblies are abolished, new arrangements are developed – nationally or within regions, but (if the latter) with Government backing – to give stakeholders a direct input to both strategy development and holding RDAs to account. Stakeholders should “own” these arrangements, and RDAs shouldn’t be able to design or manipulate them to suit their convenience. In its scrutiny role, the stakeholder forum should work closely with the LA Leaders’ Forum, building on the strengths of the RA. We also see a continuing need for a strong independent SD champion role. We **propose** to discuss further with regional partners shortly how such arrangements – taking forward the SD champion and stakeholder representation roles in parallel, through separate but linked bodies – could best work in the East of England.

Proposed power for Government to amend IRS unilaterally after submission

24. See response to Q5 below. The proposals in para. 4.19 of “*Prosperous Places*” are not wholly clear; but it appears that – unlike the present arrangements for the RSS – they allow for changes to be made to the IRS by Ministers after submission, without further public consultation. This seems unacceptable. The Strategy will have gone through a rigorous consultation process, SEA / Habitats assessment etc, followed by Examination in Public. For the Government to retain the right to make subsequent unilateral changes is unsupported by argument, except perhaps the desire to “streamline”, could undermine public confidence in the process, and is at odds with the “good governance” principle.

Whether a “representative” LA Leaders’ Forum can work

25. According to para. 3.15 of “*Prosperous Places*”, “*The Government believes that local authorities themselves should decide the most effective structure for a leaders’ forum to suit the needs of their region.*” [but] “*It is the Government’s view, however, that any forum should be: (a) streamlined, manageable and able to make strategic, long-term decisions and engage effectively with the RDA; (b) representative of local government across the region, for example, in terms of representation of key sub-regions and upper and lower tier authorities;*” These statements are inconsistent: in our view the former – regional discretion – should prevail. LA leaders are not elected, and may not be well equipped, to represent the people of other LA areas; moreover a selection process is liable to reinforce the influence of party groups on the Forum. Although any Forum will obviously need a management committee to deal with day-to-day business, we **recommend** that, if the LAs in a region opt for a Forum with all LAs as members, their wishes should be respected.

Potential for conflict between LA Leaders’ Forum, Regional Select Committee, and Regional Minister

26. There is a proliferation of bodies with scrutiny as a major element in their role, and potential for conflict between the LA Leaders’ Forum, the new mechanism for stakeholder representation, the Regional Select Committee, and the Regional Minister especially when party political control varies between them. The Leaders’ Forum has a clear remit both in scrutinising the RDA’s work and as the collective voice of LAs in the region, stakeholder representation is similarly essential for reasons set out in paragraphs 21-3, and the Regional Minister is developing a useful role as a two-way channel of communication between the region and central Government. A Regional Select Committee could have value as a scrutiny forum genuinely detached from executive responsibility, but could also risk overcrowding the regional policy landscape, imposing costs on others in servicing it, and focusing on national party politics at the expense of regional issues; we are not yet convinced that it would add sufficient value to justify these risks. Hence our call for a renewed assessment of the best institutional, financial and accountability arrangements for ensuring delivery of SD in the region.

Statutory duty on LAs to assess local economic conditions: relationship with “well-being” power

27. As noted above, we welcome the proposals to increase delegation of delivery responsibilities to sub-regions and LAs, and strengthen the basis for collaboration at local level in delivering SD and regeneration. However, we share the SDC’s concerns about the inconsistency between the proposal to impose a new duty on upper-tier and unitary authorities to assess the economic conditions of their areas, and the Government’s refusal to change the power in the Local Government Act 2000 for LAs to secure the social, economic and environmental wellbeing of an area – which is crucially relevant to local SD initiatives – into a duty. Like other aspects of *“Prosperous Places”*, this reinforces the perception that the Government sees economic development as having priority over environmental enhancement, social cohesion and resource conservation. We understand concerns about proliferation of new duties on LAs, but we **recommend** that LAs’ and LSPs’ role – power or duty – in “place-shaping” and promoting well-being and SD, should be considered as an integrated whole.

28. We also share the SDC’s concerns about the proposal to exclude shire district councils from the new duty, and – associated with that – the alienation of community representatives from the development of Sustainable Community Strategies (SCSs) as the latter are increasingly required to contribute to central targets. SCSs should belong to their communities, subject only to the very broad framework of principles and priorities set out in *“Securing the Future”*.

ANNEX A - SUSTAINABILITY EAST: RESPONSES TO CONSULTATION QUESTIONS

Note: we consider that these questions do not cover important and controversial aspects of the proposals in *“Prosperous Places”*, in particular the relative priority accorded to economic growth vis-a-vis other aspects of SD. Our responses to the specific questions should therefore be read alongside our full response set out above.

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

No comment.

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?

See paragraph 25 above. We support maximum regional discretion over the membership of the Forum: the proposed criteria – notably the requirement for a “streamlined” Forum – appear too restrictive and inconsistent with the Government’s expressed wish for regional flexibility. However, effective engagement of stakeholders in strategy development and scrutiny – whether through the LA Leaders’ Forum or separately – should be mandatory.

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

No: see paras 18 – 24 above. In particular the lack of clear proposals for involving stakeholders (“SEEPs”), not only in scrutiny but also in strategy development, and the proposal that RDAs should remain accountable to Parliament through BERR, are seriously defective. Any stakeholder representative body that replaces the Assembly Community Stakeholders’ Group should be independent of the RDA, and should work closely with both the LA Leaders’ Forum and the regional SD champion body.

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?

See para 11 – 14 above. The list of elements of the Integrated Regional Strategy is deficient:

- a) in singling out economic growth for special attention at the expense of other elements of SD (with the implicit assumption that growth is deliverable regardless of resource constraints and other factors);
- b) in singling out housing supply, affordability and quality for special attention, and making no reference to other issues relevant to relieving deprivation and promoting social cohesion;
- c) in making no reference to greenhouse gas emissions other than CO₂;
- d) in making no reference to landscape and townscape conservation and design quality.

We have seen the East of England Environment Forum's suggested redraft of the list in para. 4.13 of "*Prosperous Places*", and endorse their general approach, especially the greater stress on SD, quality of life and environmental limits to growth. We recommend that guidance on developing Integrated Regional Strategies should make explicit links to the SD principles and objectives set out in "*Securing the Future*"

We are also concerned about imposed housing targets. We appreciate that these replicate the existing planning regime governing Regional Spatial Strategies, but they exclude consideration within the region of environmental limits to housing growth.

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?

See paras 18 – 24 above. We support regional flexibility, but we are concerned at the potentially reduced scope for stakeholder input caused by the planned replacement of Regional Assemblies by LA Leaders' Forums. New arrangements are needed for ensuring effective stakeholder involvement throughout the strategy development process and in subsequent monitoring and accountability.

In particular we are concerned that – unlike the present arrangements for the RSS – the proposals appear to allow for changes to be made to the IRS by Ministers after submission, without any further public consultation. This seems unacceptable. The Strategy will have gone through a rigorous consultation process, SEA/Habitats assessment etc, followed by Examination in Public. For the Government to retain the right to make subsequent unilateral changes unsupported by argument – except perhaps the desire to "streamline" – and could undermine public confidence in the process. We also share the concerns expressed by the EEEF and others about retaining a formal legal status for the Examination in Public and ensuring that the process is properly resourced, also that the timetable proposed may be unduly optimistic.

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 anticipate only modest savings in costs, and potentially significant disbenefits in terms of public and stakeholder engagement. The Regional Spatial Strategy attracts much greater public and media attention than the Regional Economic Strategy, and the IRS will need to achieve a similar level of public and stakeholder engagement as the RSS if the process is to be seen as fair.

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

See paras 27-8 above. LAs' economic assessment responsibilities should be treated in the same way as other elements of their "well-being" power, and responsibilities to promote SD

more generally. Given that the Government does not propose to turn the “well-being” power into a duty, we favour Option 3, i.e. no new economic assessment duty.

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

No comment.

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

Besides our more general reservations about the proposed power, we are concerned at the proposal to place the new duty only on unitary and upper-tier authorities. Shire district councils have a key role in promoting sustainable development, and may be more effectively representative of community opinion.

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

This should be a matter for LAs. The list at para 5.20 has significant omissions – just for example, water companies, PCTs, parish councils – but it should not be necessary for Government to prescribe an even longer list.

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

Not applicable.

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?

We have no strong views on whether new statutory arrangements are required. If new bodies are established, however, they should be subject to a duty to promote SD and have power to act on social, environmental and resource protection issues as well as economic development.

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?

No comment.

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

We are not well equipped to comment in detail. However, our perception is that the LA performance framework is already over-complex, with an excessive number of indicators and targets, and any new arrangements for sub-regional collaboration should not lead to a new layer of reporting nor additional targets.

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

No comment.