

## **INTEGRATED REGIONAL FRAMEWORK CONSULTATION**

### **Kirklees Council response**

#### **Introduction**

Earlier this year the Government set out guidance on strengthening delivery of sustainable development in the regions. The guidance states that each region should rationalise current arrangements to produce a single high-level strategic framework by December 2007. For Yorkshire & Humber this means replacing Advancing Together and the Regional Sustainable development Framework with a new Integrated Regional Framework (IRF).

The consultation document is titled "Promising Prospects for the Region" sets out 24 questions for partners to consider. Below is the Kirklees response to each of the questions.

#### **SECTION 1: THE ROLE OF THE FRAMEWORK**

##### **Question 1**

###### **Do you agree with the role of IRF as described in this section?**

Yes, in theory. Following on from the announcement in the Sub-National Review of Economic Development and Regeneration to move to a single integrated regional strategy for economic and spatial objectives it makes sense to try and align sustainability and the other landmark issues outlined in the consultation.

#### **SECTION 2: THE REGION'S PRINCIPLES FOR SUSTAINABLE DEVELOPMENT**

##### **Question 2**

###### **Do you agree that the framework should adopt the national principles for sustainable development?**

Yes, provides transparency and synergy from a national perspective through to the local level of delivery. Suggest that a principle covering cohesion should be considered.

#### **SECTION 3: THE REGION'S VISION**

##### **Question 3**

###### **What do you think the new vision should include?**

Important to stress the importance of 'place' and emphasise the economic perspective. In line with our Kirklees Vision and Ambitions, a reference to diversity should also be considered and perhaps a note to the 'green' agenda as opposed to the environment.

#### **SECTION 4: THE LANDMARK ISSUES**

##### **Question 4**

###### **Do these seem to be the right 'landmark' issues? Do you have specific examples where one or more of these issues are particularly significant?**

Yes, they are the right issues but should consider adding community cohesion.

The West Yorkshire authorities have identified community cohesion as a key priority and have established the West Yorkshire Community Cohesion Project Group to lead collaborative work in this area. The group includes a representative from each of the five West Yorkshire local authorities, the West Yorkshire Policy Association (WYPA), West Yorkshire Police and Government Office for Yorkshire and the Humber (GOYH). Promoting community cohesion is also

key theme or principle in the Community Strategies for all five districts in West Yorkshire, and features in the principles, outcomes and indicators of the Local Area Agreements in each district.

While each sub-region within Yorkshire and the Humber faces different cohesion challenges, promoting community cohesion is significant issue facing the region as a whole.

## SECTION 5: USING THE FRAMEWORK TO MAKE A DIFFERENCE

### Question 5 – Widening Gaps and Inequalities

**Is this a correct description of the issue? Where do you see this issue as most obvious in the region?**

Broadly yes. In Kirklees we are the 77<sup>th</sup> most deprived district of 354 in England on the Index of Multiple Deprivation with disparities of wealth across the district. There are pockets of affluence in Lindley and Fixby in Huddersfield and pockets of rural deprivation in parts of the Colne and Holme Valleys. Kirklees suffers more than most in experiencing disparities of wealth at a neighbourhood level. For example in certain wards the vast difference occurs from one side of the street to another.

Also worth noting possible implications from the Sub-National Review with local authorities having to map out their areas.

### Question 6

**Are you aware of work being undertaken now or in the near future to address this issue? Where will this take place?**

#### Dewsbury West Neighbourhood Pathfinder

Neighbourhood management is a way of significantly helping deprived communities to improve their community, by working with service providers to enhance local services where problems have been identified locally.

#### Neighbourhood Renewal

Neighbourhood Renewal is a central government strategy to address social and economic disadvantage and inequalities in service delivery. 36 Super Output Areas in the most disadvantaged parts of Kirklees have been targeted for additional funds and activity.

#### Sure Start

A Government initiative with earmarked funding that aims to work with parents and parents to be, particularly families perceived as disadvantaged, to promote the development of babies and children under 4 years of age. Five Sure Start programmes and fourteen Childrens Centres have been established.

#### West Yorkshire Investment Plan

As part of the Investment Plan monies, Kirklees is funding a series of projects and initiatives under two themes; skills and access to employment. Projects include;

- Up and Working – creating stronger links with employment agencies
- Build – linking skills and employment opportunities with the construction industry
- Connecting Skills with local investment

### Question 7 - Transport

**Is this a correct description of the issue? Where do you see this issue as most obvious in the region?**

Broadly, yes.

1 in 10 of our residents find it difficult to travel to education, training, work and leisure activities. At peak times road congestion is getting worse with the M62 to Leeds often stationary and Trans – Pennine rail services over crowded. We contribute strongly to the West Yorkshire Local Transport Plan and Leeds City Region Transport Vision working in partnership to tackle the key issues.

As well as the issues identified the IRF should be used to highlight the increased investment required in transport infrastructure for the region in order to reduce congestion and journey times. Over the last few years our region has seen levels of investment significantly lower than the England average and the IRF should be used to address this.

**Question 8**

**Are you aware of any work being undertaken now or in the near future to address this issue? Where will it take place?**

As well as ongoing work to deliver the Local Transport and City Region Transport Vision we have implemented a series of projects and initiatives to 'connect' our residents. Works includes;

- Work with bus operators to keep yellow line restrictions and bus lanes free of parked cars
- Introduction of "Yournextbus" GPS technology to track bus location
- Installation of illuminated shelters to improve security
- Upgraded 600 bus stops to DDA standards and provided improved timetables
- Introduction of Huddersfield Free Town Bus linking main shopping areas, the university and the train and bus services
- 'Combined ticketing' particularly in Holmfirth offering a combined rail ticket to Leeds or Manchester from the Holme Valley

Delivery of Leeds City Region Transport Vision and Investment Plan aims to deliver a high quality, multi-modal transport network throughout the city region, alongside better links to neighbouring city regions and global markets through regional airports and ports. The recently established Transport Panel has been created to ensure the Vision is delivered.

**Question 9 – Climate Change, Energy & Resource Use**

**Is this a correct description of the issue? Where do you see this issue as most obvious in the region?**

Yes.

Important to stress that multi –faceted environmental issues such as biodiversity and climate change involve the participation of a number of service and partners if we are to reduce the negative effects on the environment it is vital that a co-ordinated approach at a regional level can be agreed.

**Question 10**

**Are you aware of any work being undertaken now in the near future to address this issue? Where will this take place?**

Kirklees has a track record of green innovation dating back to 1989, when it was the first Council to commission a State of the Environment, which was produced by Friends of the Earth. From these beginnings we have successfully brought inward investment into the area to enhance our green networks and habitats, provide environmental mapping capability and to develop a major renewable's programme.

The next 12 months will be a mixture of delivering ground breaking programmes and laying the

foundations for a sustainable future. Below are some examples of what we will do:

- Warm Zones - complete the first phase of warm zones, offering free loft and cavity wall insulation and carbon monoxide detectors in all households;
- Energy Management - engage services in a programme to examine their own carbon footprint and with corporate support, develop action plans to produce year on year reductions in energy and water use, staff travel and increased recycling;
- District Heating - continue work with key partners to produce costed action plans for district heating and hydropower;
- Biomass – our woodland will be assessed in terms of suitability for long-term biomass feedstock and we will start implementing a maintenance regime in preparation for future rollout of biomass heating in Council buildings.

### **Question 11 – Housing Markets and Affordability**

**Is this a correct description of the issue? Where do you see this issue as most obvious in the region?**

Broadly yes, although the issue of connecting job opportunities and location of new housing should be mentioned. Also it isn't just about restructuring the housing market, in many areas across the region is about renewing what's already there. Affordability is a key issue at a national, regional and local level.

It should also be stressed that not all service sector jobs pay a low wage.

### **Question 12**

**Are you aware of any work being undertaken now or in the near future to address this issue? Where will it take place?**

Our experience and analysis has shown dramatic changes in housing affordability over recent years and consequent increase in the need for new affordable housing. The Local Housing Assessment demonstrated an annual shortfall in excess of our target for housing completions within the Regional Spatial Strategy. Our response to this has been to take a comprehensive approach to meeting this increasing level of need, tackling the problem from a variety of angles.

#### **Maximising delivery of affordable homes through the planning system**

Kirklees has seen delivery of affordable housing through the planning process as a priority, and we are improving in our ability to secure affordable homes through Section 106 agreements. In 2005-2006 these negotiations resulted in agreements to deliver an additional 106 units within Kirklees.

Supplementary Planning Guidance (SPG) has been in place since 1999 - coinciding with the approval of the new Unitary Development Plan - and a proportion of affordable housing has been secured in general market schemes of an appropriate scale. The approach has been consistent and systematic and, effective joint working exists between Services and with neighbouring authorities.

Our aim has been to maximise delivery of affordable homes ensuring that the levels sought do not prejudice the provision of new homes in total. The proportion secured takes account of information on needs, analysis of core indicators such housing trajectories, and feedback from consultations. Care has had to be taken because house completions have remained at levels a little under the approved requirement and the approach has had to be pitched accordingly.

Information from the recent Housing Needs Assessment has pointed towards increasing the number of affordable homes to be secured if this can be achieved. With this in mind new guidance through a Supplementary Planning Document is in the pipeline which will examine the scope for reducing site size thresholds and increasing the proportion of affordable homes negotiated on each site. The Council will also be considering how it progresses other ideas, such as exception sites

and rural initiatives, to increase provision. It has already adopted the lower indicative national site threshold since the introduction of PPS3 in April and it has developed an approach, allowing the release of greenfield sites for housing only where community benefits, including extra affordable housing provision, are secured.

LDF Project Board has decided to accelerate work on the SPD, in advance of the LDF Core Strategy, to ensure that more affordable homes can be secured as quickly as possible. The document will be based upon UDP policy H10 which is proposed to be saved. Consultation on the draft document and associated sustainability appraisal is timed to take place soon after proposed changes to the Draft RSS are published by government, to avoid any risk of inconsistency. Publication of the changes is due in September.

### **Maximising delivery of affordable homes through the NAHP**

We have increased programme delivered by RSLs. For 2006-8 this will deliver Negotiated 164 new affordable homes through Registered Social landlords.

KNH are in negotiation with the Housing Corporation to be one of first ALMOs to be considered for delivery of affordable housing with Housing Corporation funding through the Northern Affordable Housing Challenge. This initiative has the potential to bring in approximately £5m of HC funding, in addition to substantial private investment.

### **Supporting fragile housing markets through housing-led regeneration**

Our approach to affordable housing is not limited to the provision of additional homes, or the replacement of non-decent homes. We are working in a number of areas to contribute to the economic and social regeneration of communities that will enable existing households to move into or upwards in the housing market, freeing up more affordable homes for those that need them. We are working in a number of areas, where our success is summarised on existing storyboards.

- Deighton and Brackenhall Initiative – in addition to a range of community initiatives this project has provided 270 new houses for sale and 73 larger homes and bungalows for rent. DBI is currently working on building a further 227 houses for sale.
- Thornton Lodge Renaissance – as part of its broader programme TLR has:
  - facilitated the construction of 30 new housing association family homes for rent
  - progressed a second phase to develop a further 37 affordable family homes
  - visited all 843 homes in the area through the 'Warmzone' programme, 300 of which will benefit from improvements
  - funded the purchase and part refurbishment of three semi-derelict houses for new housing association tenants
- Colne Valley Rural Housing Project - aims to complement Yorkshire Forward's Renaissance Market Towns Programme. To tackle rural housing issues it :-
  - has enabled the acquisition of an additional 11 affordable units in 2006-07 working in partnership with Connect Housing
  - will deliver a similar level of provision in 2007-08 subject to securing Housing Corporation funding

We have also been successful in attracting Housing Market renewal funding for the Dewsbury area. Funding was £904k for 2006/7 and £642k for 2007/8. For 2008/11 we anticipate a further £9m.

The project aims to transform the housing market within a large geographical area to the south of Dewsbury by a strategic approach which links economic priorities with spatial and investment priorities to create vibrant neighbourhoods. This will take place within the broader context of the North Kirklees Strategic Development Framework. Consultants have been appointed to carry out the study which will complete by the end of 2007. This wider study will focus on the key

settlements of Dewsbury, Batley, Heckmondwike, Cleckheaton, Mirfield and Birstall.

### **Provision of new affordable homes for rent through “Excellent Homes for Life”**

Using our previous experience of Private Finance Initiatives (PFI) to provide capital investment, we successfully submitted a business case (to the Department for Local Communities (DCLG), for £101million of PFI credits for a project to provide 550 new homes in Kirklees. We consulted with tenants and other stakeholders and agreed that:

- The new housing should provide homes for smaller households (including younger people), people with physical disabilities and older people requiring extra care and support (including those suffering with dementia).
- In line with the council’s corporate commitment to ‘green’ policies, the project will incorporate the highest standards of ecological design.
- Homes would be developed to the ‘Lifetime Homes’ standard; creating living accommodation which was flexible to people’s changing needs.

### **Improving performance in bringing empty homes in the private sector back into use**

- We exceeded our performance target for 2006/7 by bringing 82 private sector homes back into use (target was 72).

## **Question 13 – Public Health and Obesity**

### **Is this a correct description of the issue? Where do you see this issue as most obvious in the region?**

Using obesity in the title of this section is misleading. We would broadly agree with the description of the issue as our local analysis of public health needs has shown that smoking and obesity are major issues. As the description suggests smoking is the most important cause of preventable death and inequality, locally we are particularly concerned about smoking rates in women of child bearing age.

The introduction of the smoking legislation is a major step forward but lots more still needs to be done, and this needs to be recognised in the description. We also feel that there are other critical issues we need to address. Our Adults and Healthier Communities Local Public Service Board has identified several additional priorities to those already mentioned, i.e.;

- infant mortality, which is a particular issue in North Kirklees;
- private sector housing condition and affordable warmth;
- incapacity benefit and work related health;
- alcohol.

We would suggest that there is a need to focus on alcohol misuse as a key priority within the public health agenda. Figures produced by the Department of Health show that rates of binge-drinking in parts of the region are amongst the highest in the country. The male admission rate to hospital for alcohol specific conditions is higher in Yorkshire and the Humber than the England average.

The health of the Kirklees population overall is improving; however there are still major gaps between our most disadvantaged communities and the rest of the Kirklees population. The infant mortality rate in our worst ward is three times higher than in the best. Adults in our Neighbourhood Renewal areas are 50% more likely to die of heart disease before they are 75 in comparison to the rest of the district.

Specific action to address obesity is required in Kirklees. Approximately 50% of adults in Kirklees are overweight or obese and this is projected to increase. The Kirklees Obesity Programme aims to reduce the number of people in Kirklees who are obese, or at significant risk of becoming obese, by providing them with the support they need to reduce or maintain their weight.

A range of workstreams focused on addressing the needs of specific population groups and involving partners are tackling the problem:

- obesity programme plan (includes needs assessment and segmentation of market, development of social marketing pilot)
- children (includes development of childhood obesity monitoring data and care pathway)
- adults (includes review of existing weight loss service, implementation of referral & weight management support within smoking cessation & establishment of care pathways and commissioning services as required)

#### **Question 14**

##### **Are you aware of any work being undertaken now or in the near future to address this issue? Where will this take place?**

We agreed with partners through both the Community Strategy and Local Area Agreement processes that one of our overarching ambitions must be to close the health gap between our most disadvantaged communities and the rest of the Kirklees population. Locally we recognised that this ambition cannot be achieved just by doing things for people, but we must focus on enabling people to retain or regain control over their own health and the factors that affect their health.

The key local issues we identified were removing barriers to good health, and particularly enabling people to have decent:

- homes
- incomes
- jobs (if they are able to work)
- social networks
- health and social care

However we also recognise that an individual's lifestyle has a significant impact on their health and so we agreed to focus our efforts on creating environments and providing support which enable people to be physically active, have a good diet, drink sensibly, stop smoking or reduce their exposure to tobacco smoke, not misuse drugs, and manage their own health, including any health problems they may have, more effectively.

Having easy access to high quality local health services is extremely important to achieving our ambitions. We have been very active, through the leadership, full Council and Scrutiny, in helping to ensure local people's voices are heard in the modernisation of health care services.

##### **What difference did we make?**

- Significantly reduced the number of sedentary older people and people on low incomes, by for example setting up over 80 walking groups.
- We were the first major employer in Kirklees to create completely smoke-free workplaces.
- Over 300 food outlets have now achieved our 'Healthy Choice Award'.
- Established a 'proof-of-age' scheme to deter young people from buying alcohol and tobacco.
- Over 80% of our schools are working towards the Healthy Schools standard.
- Provide funding for nearly 90 voluntary groups to support vulnerable adults to maintain their health and independence.
- Ensured voice of local people and councillors has been heard in local NHS service changes, and that prevention and inequalities are addressed.

##### **What were the keys to our success?**

- Agreeing with partners a clear set of priority issues to focus on, and being clear which groups could benefit most and targeting activity appropriately.
- Drawing on local and national evidence of what is most likely to work to help local people make the changes they wanted.
- Supporting council services to recognise the contribution they do make to improving health and

how they could do more.

### **What are we doing next?**

We have recently appointed the first ever Director of Public Health for Kirklees jointly with our local PCT. This represents a step change in our commitment to integrating still further the health agenda in to our core activity. The work being led by the DPH will focus on:

- A joint 'strategic needs assessment' with the Directors of Adult Service and Children's Services, and developing the intelligence infrastructure to support this.
- Sharpening our focus on key health priorities including infant mortality, food, physical activity and obesity, alcohol, mental health, long term conditions and work related health issues.
- Ensuring the promotion of health and reduction of inequalities is at the heart of our planning and delivery of services for children and older people.

### **Question 15 – Higher Level Skills and Business Innovation**

#### **Is this a correct description of the issue? Where do you see this issue as most obvious in the region?**

Broadly, yes.

Although graduate retention is an issue, in our experience many would like to stay in the region but lack of opportunities and modest wage levels are disincentives. One possible way to engage businesses in innovation is to encourage them to recruit more graduates.

### **Question 16**

#### **Are you aware of any work being undertaken now or in the near future to address this issue? Where will it take place?**

The Leeds City Region Development Programme has a three aims under the Skills and Labour Market banner:

- A workforce with the skills needed for our economy to thrive. In particular we will need the appropriate skills for our key growth sectors and clusters;
- An efficiently functioning labour market in which
  - the right skills are in the right places;
  - sub markets are increasingly joining together, supported by the connectivity necessary for the market to function across the city region;
- An inclusive labour market, maximising participation and consequently output, embracing the needs of all sectors of our community.

The newly formed Skills and Labour Market Panel has been created to work towards achieving these aims.

Links between Kirklees Council and the University were not strong and this was to the detriment of both bodies and the regeneration of Huddersfield as a whole. Links had not been strong for a number of reasons – some going back to the days when the council had a measure of control over the polytechnic's activities. Despite a number of efforts it had not proved possible to establish and sustain a strong working relationship between the two organisations.

#### **Why did this matter?**

The university has become a powerful economic and educational force in Kirklees as a whole and in Huddersfield in particular, with over 20,000 students and some 2,000 staff. It has performed strongly in recent years – particularly compared to those other universities which were polytechnics. Major investment has taken place on the campus and the university adds significantly to the profile of Huddersfield, makes a strong contribution to the growth of the knowledge economy in the town and attracts business and visitors.

It became self evident that a strong partnership between the council and the university would be of

mutual benefit and could give a further boost to the regeneration of the town. The benefits identified covered a wide range of economic and educational interests:

- development of a campus strategy
- promotion of Huddersfield
- children's and young people's issues
- business and skills issues

Key initiatives undertaken to achieve these include:

- Launch of an ambassador's programme (a three way initiative also including the Huddersfield Contemporary Music Festival) as part of a marketing event for Huddersfield held in November 2006. 27 ambassadors from all walks of life, but having strong connections with Huddersfield, will be advocates for the town.
- Development of a campus strategy including future plans, sites for future development and links to other projects of mutual interest, for example the provision of a new sports centre. This will help ensure an efficient and effective council regulatory response.
- Input from the university into the work of the Kirklees Partnership and several of the Local Public Service Boards (Regeneration and Sustainable Development and Children and Young People).

#### **What was the key to our success?**

- A recognition by the council at both councillor and officer level that the university is a key economic player in the town and that Huddersfield and Kirklees as a whole benefit from a strong and successful university.
- The growth, success and increased confidence at the university – as an institution and recognition of the contribution it makes to the town.
- A willingness by the council to promote Huddersfield as a place for investment, to visit and to live (as distinct from Kirklees).
- A commitment by both organisations to work together to raise the profile of the town.
- A shared commitment to working more closely on key issues.

#### **What are we doing next?**

- Continuing to develop the Ambassador's programme agenda and other promotional initiatives.
- Strengthening collaboration between the council's Children and Young People Service and the university.
- Exploring with Yorkshire Forward the potential to establish a technology hub in the town (as part of the Regional Innovation Strategy) and for the university and the council to be involved in that.
- Continuing to work together to boost enterprise and entrepreneurship in the town.
- Continuing involvement by the university in key local partnerships.

#### **Question 17 – Violent Crime**

**Is this a correct description of the issue? Is the increase in the crime rates due to how figures are reported? Where do you see this issue as most obvious in the region?**

Broadly yes. There is evidence locally of success in tackling violent crime in targeted areas such as town centres as a result of actions with various partner initiatives e.g. taxi marshals, Best Bar etc.

Nationally there is an issue of crime perception. Generally crime figures are reducing but the fear and perception of crime is increasing.

#### **Question 18**

**Are you aware of any work being undertaken now or in the near future to address this issue? Where will it take place?  
What was the issue to address?**

In 2003/4 recorded crime had risen in Kirklees by 6% on the previous year. Despite significant reduction in key areas such as Domestic Burglary, crime was still rising. In 2004/5 the Kirklees Safer Communities Partnership set itself a target of reducing crime by 35% by 2008. Considering the rise in crime in the previous year, this was a significant challenge to meet.

**What did we do?**

We reviewed the way in which our Partnership approached crime reduction, and took on board the principles of the national intelligence model. We also moved towards locality-based working.

By making sure that we have more robust working relationships between agencies and communities in the places presenting the most challenges, we are able to analyse problems and plan what we will do more effectively.

Neighbourhood Management Groups have been set up in all seven locality areas. This means that representatives from different partners come together and develop local interventions and action plans.

These partners include the police, Safer Communities Service, Environmental Services, Neighbourhood Wardens, Kirklees Neighbourhood Housing and others. They seek to address local crime and anti-social behaviour as quickly and as effectively as possible.

We also took a look at issues which were affecting many different areas of Kirklees and developed ways of tackling them that could be implemented in any area of Kirklees, regardless of geography or community. For example, alcohol being drunk in public places often contributed towards a rise in violent crime, so we introduced Alcohol Reduction Zones. So far there are three in Kirklees; Huddersfield Town Centre, Dewsbury Town Centre and Batley.

**What difference did we make?**

- Overall crime has been reduced by 17.5% with significant reductions in key areas
- Domestic Burglary has been reduced by 39%
- Theft of Vehicles has been reduced by 38%
- Theft from motor vehicles has been reduced by 26%
- 7 Neighbourhood Management Groups have been established
- A Violent Crime Action Plan involving schemes such as Alcohol Reduction Zones, Best Bar None, Taxi Marshals and hard hitting awareness campaigns has been implemented

**What were the keys to our success?**

- Establishing a common Neighbourhood Management framework
- Ensuring that agencies and communities can see the benefits of working together
- Establishing both short term interventions and long term strategies

**What are we doing next?**

Our challenge is to expand the role and numbers of the Neighbourhood Management Groups and to join them up to wider locality working both within the Council and with our partners, in order to continue effective reductions in crime and anti-social behaviour.

**Question 19**

**Are there any comments you would like to make about what has been done so far and what else could be done in relation to these landmark issues?**

Although the attempt to gather information about what is happening in the region in tackling the key issues is worthwhile, there will need to be some follow up work as its not clear from this document how much detail is required or at what level this should be collected. As well as consulting with local authorities it shouldn't be forgotten that the majority of landmark issues come under the city region structure and therefore it would be worth highlighting how the CR future work programme intends to address them.

#### **Question 20**

**The landmark issues will be most effectively addressed if they have 'champions' that commit to engaging with other partners to drive them forward. Have you any suggestions about who might be the 'Champion' for each Landmark issue?**

The landmark issue outlined above will be most effectively addressed through ongoing work of local authorities, the city region process and not by a 'Champion' driving them forward. The economic issues already have a champion in the City Region process (particularly the elected member panels) and it's not clear how an individual will be able to impart anymore influence. Effort should be concentrated on strengthening existing partnerships and relationship to tackle the challenges within each issue.

### **ALIGNING STRATEGIES AND FUNDING**

#### **Question 21**

**Do you agree with the approach to appraisal as described in *Appendix A*? How would you amend the proposed appraisal questions?**

Broadly, yes. Builds on previous work by the Assembly and knowledge and experience gained by local authorities in carrying out sustainability appraisals. Also need to ensure reports to be appropriate for the audience and clearly set out why the appraisal has been undertaken.

On the appraisal questions, consider including one on the promotion of cohesion.

#### **Question 22**

**What contribution do you think the Framework could play in supporting the alignment of resources within the region and in securing additional resources for the region?**

Should be used to lobbying government for more transport funding to enable delivery of the City Region transport vision. General support of City Region process, delivery of Development Programme and support work of CR panels.

### **MONITORING, REPORTING PROGRESS AND DEVELOPING THE FRAMEWORK**

#### **Question 23**

**Do you agree with the proposal to have three levels of indicators? Overall do you think the indicators in *Appendix B* will do the job described?**

The indicators are no worse or better than any others we regularly use and contain much the same stuff. There are gaps which are highlighted e.g. Access to services and there some included which we regard as flawed and weak indicators e.g. formal and informal volunteering.

One objection is the suggestion that a Headline Indicator should be an index of Quality of Life/Wellbeing. Indices are objectionable because they mix a range of data which often has differing levels of reliability and the result looks objective but clearly depends on the variables chosen, the method of combination and the levels of weighting. We would prefer something numeric and reliable such as Average earnings or Working Age Benefit Client Group.

Overall Appendix B will probably do the job as contains the 'usual suspects' with the same flaws and strengths, pretty comprehensive but underlines how weak our capacity for measuring some things is e.g. culture, natural environmental quality, civic participation.

#### **Question 24**

#### **Do you have any comments about these proposals for reporting progress and the suggested annual conference to debate policy implications?**

An annual conference may well be of use but care needs to be taken to avoid duplication and to ensure the issues being discussed can be addressed by the Assembly and partners.

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