



## SOUTH BELFAST PARTNERSHIP BOARD

Urban Policy Review Branch  
URSD  
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Gasworks  
Ormeau Road  
Belfast  
BT7 2JB

25 October 2012

Dear Sir/Madam

### **RE: Urban Regeneration and Community Development Policy Framework: Consultation Document**

I write to you on behalf of the South Belfast Partnership Board in response to the consultation on the Department for Social Development's Urban Regeneration and Community Development Framework. Overall, we welcome the proposed policy framework, particularly the need to "shape the strategic direction of urban regeneration and community development policy" in the light of the forthcoming transfer of responsibility for these aspects under the reform of local government.

That said, we would argue that the framework as currently drafted is too 'high-level' and lacks the detail that will ensure effective delivery of interventions on the ground. For example, there is no guidance as to the process for transferring responsibility for regeneration and community development to local Councils in the future – a process that is already well underway in Belfast, even without the presence of a guiding policy framework – and there are no general timescales discussed or indeed what may constitute success in the delivery of this high-level policy in the long-term.

We believe it would be beneficial for DSD's policy framework to be more prescriptive in terms of setting parameters for the design of new funding programmes by local Councils. This would serve to provide greater clarity and consistency in approach and could ensure that funding is ring-fenced to reach communities on the ground rather than being absorbed within Councils' broader budgets.

Similarly, we also welcome the rhetoric that the framework should apply to all aspects of government and that it seeks to draw together a range of strategic, cross-cutting government policies and programmes. However, we note in practice that this is a significant challenge for the public sector, and one that has not been effectively addressed to date. We therefore suggest that an additional objective of the Framework should be introduced

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around the development of cross-Government commitment to community development approaches and joined-up working when planning investment and services.

Within this context, please see below for a number of more specific comments in relation to the content of the draft Policy Framework document.

### **Definitions**

In relation to specific consultation question on the Framework's definitions of 'community development' and 'urban regeneration', we welcome the recognition that definitions should be broadened so that "a more flexible approach" can be utilised in the future "to allow for better integration of all funding opportunities that are available for urban and rural communities."

However, in the light of this, we would question whether the framework even needs to draw a distinction between 'urban' and 'rural' areas. Rather, it may be more appropriate to set out a broader policy to inform decisions regarding the scale of investment in a particular aspect of 'regeneration'. For example, recognising that the scale of investment should be proportional to the geographic area covered and/or the population to be served by a particular intervention would ensure that appropriate investment is given in a particular instance regardless of whether the intervention is within an 'urban' or 'rural' setting.

We are happy with the definition provided within the Framework for 'regeneration', but wonder within the context of our comments above whether the Framework itself should be re-named to remove any confusion or ambiguity. Perhaps 'Community Regeneration Framework' or 'Regeneration and Community Development Framework' would be more appropriate alternatives.

In relation to the definition of 'community development', we welcome the definition used and note that this is the same definition being utilised by the Council in Belfast for the development of its new Community Investment Fund, as outlined in the Council's Community Development Strategy. However, given that the definition gives three distinct elements of 'community development' – i.e. influencing or taking decisions, defining needs and solutions, and taking action to help themselves – it is disappointing that the draft framework seems to major on just one element of this – "promoting engagement" (Policy Objective 4). Whilst the other two principles are implied throughout other parts of the document, we feel it may be appropriate to make them more explicit within the Policy Objectives.

### **Policy Objectives**

Despite our comment above regarding the definition of 'community development', we generally welcome the four Policy Objectives proposed within the Framework. In relation to the first Objective around tackling area-based deprivation, we recognise the need to continue to focus on tackling inequalities and the persistent problems exhibited within areas of multiple deprivation. However, we note that there has been a tendency within existing programmes to focus too narrowly on 'local' solutions to 'local' problems.

For example, within the Neighbourhood Renewal programme there has remained a commitment to funding a few larger community organisations based within target areas, who seek to deliver every service and meet every need 'in-house'. This has, in some instances, led to an insular focus that has served to limit potential for interventions that could be delivered more effectively on a wider, more strategic basis. Of course, there are

very good examples where the voluntary are commissioned to deliver services across the city, or across traditional community boundaries, but these tend to be an exception rather than the norm.

We therefore welcome the recognition on p13 that “the scale of intervention needs to be both strategic and local” and urge the Department to ensure that the strategic nature is given greater emphasis moving forward. In the current economic climate and in the light of ever reducing resources, there needs to be strong recognition that many interventions can be most effectively delivered across several areas of need, as long as they continue to have a local impact where they are most needed, rather than needing to be delivered directly within local neighbourhoods.

This point also strikes right at the heart of the Policy Objectives 3 and 4, highlighting the need for organisations such as the South Belfast Partnership to provide a more strategic view within urban regeneration and community development. In particular, we welcome the importance that Policy Objective 3 gives to the strategic connectivity between areas of need and areas of opportunity. SBPB have clearly argued for many years that building on our economic strengths and better supporting and exploiting our social and environmental assets has great potential to impact on those living within the most deprived communities through access to opportunities. We also welcome the recognition that developing “networks, partnerships and participation within and between communities” is important and that existing networks and cross-area working arrangements need to be strengthened (Policy Objective 4, p18).

These arguments take us back full circle to the issue of how community ‘needs’ are defined and identified in the first place. We have seen first-hand the risk that missing this strategic view can take, as duplication of services can emerge both within and between the community and voluntary sector, public sector and private sector. Once again, there are many examples of where this duplication has been identified and removed, such as the re-organisation of the South West Belfast Neighbourhood Partnership under their current contract(s) for funding with the Department under the Neighbourhood Renewal programme, but we believe there is still some way to go in this regard across the sector as a whole.

There is also a danger that funding can be skewed to address organisational needs within communities, rather than the community needs themselves. We believe the proposed Policy Objectives go some way to addressing this concern, but would re-iterate the need for greater detail in how these are implemented in terms of evidence based decision making and accountability structures and arrangements.

### **Enabling Objectives**

In the light of our comments above, we also welcome in broad terms the Enabling Objectives proposed within the draft Policy Framework. In relation to the first Enabling Objective, we would highlight the need to look more holistically at monitoring the impact of investment. We would argue that outcomes have often focussed on measuring activities in terms of number of people on courses or accessing particular services, etc., rather than looking more at the social impact resulting from these activities.

There are two important points in relation to this. Firstly, the community and voluntary sector have already begun to recognise the importance of measuring and monitoring social return on investment. However, there is a need for better support and up-front investment from the public sector to ensure that organisations are able to effectively monitor

meaningful outcomes and report these to funders without having to duplicate work when compiling monitoring returns. Secondly, there needs to be recognition, particularly in relation to early interventions, that the eventual impact of interventions and investment may only be seen in the long-term. That doesn't mean that monitoring should not take place in the short-term, but rather that some impacts cannot be measured or evaluated within the lifespan of particular project or intervention.

In relation to the second Enabling Objective, we welcome the recognition that an "Innovative Financial Environment" needs to be supported, particularly within the current economic climate. In particular, we recognise that in some cases, social enterprise may offer a very viable alternative to address social needs without recourse to grant funding. As part of this, we welcome the recognition in Enabling Objective 4 that the community and voluntary sector needs to be more "effective and efficient", reducing duplication, working more collaboratively, embedding full cost recovery within contracts, participating in procurement processes and exploring opportunities for asset management and ownership.

However, within these objectives there needs to be recognition from the public sector, followed by a commitment of resources, to support the sector in diversifying income streams and moving towards more sustainable business models. Again, there is a need to recognise the importance of the role that organisations such as ours can take in terms of encouraging collaboration and providing a more strategic view of interventions to address social needs, particularly those needs that are common to several of the areas suffering the highest levels of multiple deprivation.

As alluded to in our introduction above, we feel it may be appropriate to include an additional enabling objective around securing commitment from the statutory sector to community development principles and collaborative practices. We believe this could begin to address many of the concerns we have outlined above, including a firm commitment from the statutory sector to work in genuine partnerships with the third sector, the participation of communities in planning programmes and services to meet their own needs, looking more strategically at the delivery of services locally and enabling voluntary sector organisations to move beyond grant funding to more sustainable financial and business models. All of this needs to be supported by Central and Local Government and will require additional resources to enable it.

### **Outcome Focused Approach**

We welcome and fully endorse the proposal to follow an outcomes focused approach in relation to designing interventions and evaluating the success of projects and programmes. Clearly, starting with desired outcomes and working backwards to define activities will help to address the issues we have highlighted above in relation to evidence based planning.

However, we would note that there is already some confusion within both the public sector and the community and voluntary sector as to the definitions of some of the key terms, such as 'impacts', 'outcomes' and 'outputs'. We therefore believe the Policy Framework could be greatly improved by providing clear definitions for these terms. In fact, to go a step further, we also feel the Framework could be given greater 'substance' by being more prescriptive in terms of defining the Government's medium and long-term outcomes for community development and urban regeneration. Individual Departments, local authorities and service providers would then be able to plan backwards from this when designing funding programmes and planning interventions.

Perhaps a broad range of outcomes could be suggested that could then be refined at a more local level as specific plans and strategies are developed. There is a great deal of knowledge and research already existing in relation to this, not least the outcomes currently being developed in consultation with local community and voluntary sector stakeholders in Belfast for the Council's new Community Investment Fund, which could be drawn upon for developing this broad outcome framework. Clearly, stakeholders from the third sector and public sector, should all be involved in developing appropriate outcomes and monitoring progress against agreed objectives.

**Final Remarks**

We trust you find these comments and observations useful and would close by re-iterating our support for the overall intent of the Framework. We would be happy to discuss any of the matters raised within this response, or provide any additional detail in relation to any of our observations if that would be beneficial, so please don't hesitate to contact us if you require anything further.

Yours faithfully



Martyn Smithson  
Urban Regeneration Officer