

Appendix 1: Call for Evidence – Place 10X – June 2023

Q1: What is the problem we are trying to solve?

Summary

- The call for evidence notes that: *“There is a Departmental macro regional approach (10X) and there are local government approaches but no defined DfE sub-regional approach and no strategic link between those three levels – is there a need for a sub-regional level?”*.
- In order to assess whether there are variations in performance, the Department has included a series of datasets aggregated up from local government district data to the level of the four City and Growth Deal areas. For info, these are:
 - Belfast Region City Deal – comprising Belfast City Council; Antrim and Newtownabbey Borough Council; Mid and East Antrim Borough Council; Newry, Mourne and Down District Council, Lisburn and Castlereagh City Council and Ards and North Down Borough Council
 - Mid South West Growth Deal comprising Armagh, Banbridge, Craigavon Borough Council; Mid Ulster District Council and Fermanagh and Omagh District Council
 - Derry and Strabane Growth Deal comprising Derry City and Strabane District Council area only
 - Causeway Growth Deal comprising Causeway Coast and Glens Borough Council). *Have used CGD geographies for an initial assessment of disparities on key issues (employment; income; qualifications; entrepreneurship)*
- In summary, they suggest that the analysis demonstrates that there is work to do to “level up”...and the inference is that this justifies the need for a sub-regional approach
- For the second part of this question, they ask *“If the Department has a role to play at a sub-regional level, does it then follow that there is a role at council area? What could this be given the role and remit of local government? Should DfE be involved only sub-regionally initially leaving the local space to councils, business, academia and communities?”*

Suggested response

- We welcome the recognition of a need for more flexible approach in the implementation of regional policy objectives. We note the variations in the data provided and, while the data is only part of the picture and does not consider issues such as support infrastructure in place;

strength and availability of networks and relationships, it can provide an important benchmark against which to set objectives and track progress

- There is some confusion over the use whether the department's intention is that place-based will automatically mean sub-regional – or whether the defined geography will vary depending on the issue under discussion (with local council level as the likely point from which all interventions build up). We fully endorse the need for flexible implementation of regional policy at a local level – but simply creating a sub-regional tier without additional transfer of statutory authority will not necessarily achieve that ambition, in our view
- A key concern for us is that, as currently described, the sub-regional approach could actually just represent another layer of bureaucracy and accountability that may not add any value
- The question around whether the Department has a role to play at local level (part B of the question 1) – we would encourage the department to engage through the existing community planning mechanisms. We consider that, by greater engagement and an appropriate investment of resources at a local level, the department – along with other partners – can both make its resources work more effectively and in line with local need. This can also help support the delivery of regional ambitions and objectives. The proposed approach appears to suggest additional activity. Instead we would propose that, if the department found a way to work better with partners at a local level – and was prepared to be flexible in the implementation of its key policy areas at a local level – they would achieve the objectives set out in Place 10X
- We consider that local authorities can provide a range of support role in the department's proposals around sub-regional economic development. In addition to our delivery responsibility in a number of areas, we can play an important convening role and are well placed to advice on relationships, networks, key contacts and local infrastructure.

Q2: What geographic areas should 10X cover?

Summary

- The call for evidence proposes three possible strands to geographic approach:
 - Sub-regional (based on City and Growth Deal geographies)
 - Local (council)
 - Custom (e.g. cross-border)

- It suggests that the City/Growth Deal geography is *“most appropriate starting sub-regional model for Place 10X”* and notes that, given the progress made to date at this level *“taking a consistent approach beyond the programme for this purpose would therefore be reasonable”*.

Suggested response

- We acknowledge and support the work undertaken through City and Growth Deals – they have encouraged new ways of thinking and collaborating across local authority boundaries and will support the delivery of investment projects that will be critical for future economic growth across the region
- In our view, the Department should take a case by case approach to investment – rather than creating a new sub-regional “tier”. Local authority boundaries appear to be the appropriate building blocks from which to build up or drill down
- We consider that the approach needs to be appropriate to the matter in hand. For example, the eleven councils are currently commissioning a new approach to business start-up and growth and we have proposed that the “sub-regional” approach will see the region broken into five areas – based on business population. The local government boundary is the building block for the five area structure. We consider that, in this instance, it will give the right mix of local flavour alongside an appropriate volume that will generate interest from the market. In this way, we have acknowledged the need to work outside of the 11 council structure but have done so in a way that makes sense for this policy action. We propose that this same approach should be used by DfE.

Q3: What is expected of delivery partners?

Summary

- The call notes that *“If DfE can use the evidence base to further identify sub-regional disparities...delivery partners such as Invest NI could direct focused support to tackle disparities at that level”*. Councils will take the view that they are consistently identifying disparities and local challenges – and working with partners such as Invest NI to address those. Invest NI already provides data on its performance at local level – and is a statutory partner for Community Planning. Our experience is that, while there is an appetite for some local flex, the mandate for change is limited

- In our view, simply identifying data without any policy commitment will render this approach limited in its capacity to make any significant change
- The call also notes that *“local councils can play a key role in working with the Department to align their priorities with DfE’s macro indicators for success”*. This is simply stating what the current approach is: councils are constantly working in the context of regional approaches and considering how we can respond to those – the real issue is what DfE is going to invest and how it is going to resource this new approach.

Suggested response

- The proposed approach aligns closely with community planning which already operates at the local authority level. The challenge here can be to move departments beyond “having regard to” commitments, to compelling them to delivery. If Place 10X can succeed in doing this, it will have a better chance of making a difference and addressing existing disparities
- Given the volume of work already under way through community planning: building a baseline of economic and social performance; identifying – with partners – priority activities to address challenges and support development within the area – it is proposed that DfE engages with the councils to understand how the sub-regional approach can align to this work. If this doesn’t happen, we see a risk that this could be just another layer on top of community planning
- Councils are familiar with meeting regional objectives – the challenge is lack of flexibility in how resources can be deployed to support delivery
- We are unsure from the call for evidence what the purpose of the sub-regional approach is likely to be. Is it simply to improve engagement? Or is there any view that it can provide a mechanism for delegating delivery responsibility to the appropriate level? If it is the former, our concern is that this will simply introduce another tier of activity – with no guarantee of adding value.

Q4: What interventions could or already occur?

Summary

- The call notes that *“Interventions can take a range of forms – from policy and legislative changes to...funded programme interventions that are targeted rather than rolled out at a regional level”*...

- It continues: *“A collaboratively produced delivery plan setting out the way forward should capture not only DfE interventions but those at local government level, and associated actions of other NICS place projects with some economic benefit...it is important that all partners have a say in the prioritisation of interventions”*. The instinct in reading this is to ask the question as to how this differs from community planning? Is it the same thing but at a sub-regional level?

Suggested response

- We agree with the need for a consistent, shared response to place-based economic development – starting with DfE but ideally extending beyond this to cover other related areas (such as regeneration and local infrastructure)
- We have some concerns with the proposals for a “collaboratively produced delivery plan” – principally because it risks duplicating effort with no guarantee of impact. Instead, we would encourage more targeted engagement and active membership of structures such as community planning and other collaborative working at local level. These can provide a mechanism for the translation of regional objectives at a local level – and ultimately help tackle inequality and unlock local potential.

Q5: What are the indicators of success?

Summary

- The call acknowledges that much of the economic data is available at council level. It includes a number of suggested categories of data to be collated including:
 - Population and its make up
 - Breakdown of industry
 - Entrepreneurship and Business Growth
 - Labour Market
 - Skills and Qualifications
 - Quality of life, wellbeing and equality
 - Innovation.
- It also notes that there will be some work required to link the agreed data sets to the 10X ambitions. In terms of internal working, it recognises the need to consider how “place” is taken account of in new policy actions and suggests that this could be done by referencing

this in impact assessments etc. Whether this is simply to note that the issue of place is covered or whether it is to propose mitigations/specific actions is unclear at this point.

Suggested response

- We are in broad agreement with the themes for the data sets as proposed in the call with a number of minor amendments:
 - Within the “labour market” theme, we would like to see consideration of specific target groups (those with a disability; females; young people; labour market participation by qualification level etc.)
 - Quality of life, wellbeing and equality – unclear whether this will cover deprivation – if not, we would propose that it does
- We consider that this approach presents a significant opportunity to better data sharing between and across government departments and local authorities. We have begun to make some progress in this regard through our work on Labour Market Partnerships (LMPs) but we consider that this approach could help go further
- All councils are currently in the process of reviewing their Community Plans for the next four years. As part of this work, there has been significant data gathering at a local level. It would appear sensible that government should use this data as part of the work on collating local data in order to generate benchmarks and identify comparative areas of challenge and opportunity across the region.

Q6: Is the Department’s definition of Place and use of Place 10X correct?

Summary

- The initial working definition proposed is: *locally-designed interventions to deliver innovative, inclusive and sustainable economic growth. Building on the existing strengths of a place to unlock potential, to empower communities and to tackle sub-regional and local inequality*
- The call notes that this is not about setting an approach that others (including other departments) will be obliged to follow – it is simply about separating the DfE Place role from that of other departments and “*to create a focus in establishing a sub-regional and local level response in tackling disparities*”.

Suggested response

- We welcome this approach from DfE. It acknowledges that areas have different strengths, opportunities and challenges – and that the departments need to build in flexibility in their policy responses to ensure that delivery responds to these
- We consider that there is some inconsistency in the language around local/sub-regional in the context of place: we don't agree that it is about local/sub-regional/regional – we think that it needs to be considered on a case by case basis, depending on the issue
- We consider that councils are well-placed to work with DfE and to advise on appropriate approaches – based on their local knowledge, networks, insights and contacts. This may mean different approaches – and different geographies – for action, depending on the issue in question. We consider that by simply setting a rigid formula of local/sub-regional/regional – and proposing that the “place” activities happen at sub-regional level, there is a risk of additional activity with no guarantee of impact.