

DATE: 30th July 2009

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Strategic Regeneration Framework (SRF1)

Ward(s) Brownhills, Darlaston South, Bloxwich East and Blakenall

Portfolios: Councillor A Andrew - Regeneration

Summary of report:

The report describes the background proposals, principles and progress towards the comprehensive delivery of the Strategic Regeneration Framework. The SRF was approved by Cabinet in March 2006 and represents a comprehensive approach to housing-led regeneration in a number of key centres and neighbourhoods in conjunction with whg.

The first tranche of spatial priorities in Brownhills, Willenhall, Bentley, Moxley and Goscote Lane Corridor were agreed by Cabinet in October 2006, and subsequently the second tranche in Darlaston and Birchills were agreed in June 2008 and November 2008 respectively. Framework Studies that identify the housing proposals and wider community benefits have been prepared and agreed by Cabinet in the first tranche areas of Bentley, Brownhills, Goscote Lane Corridor and Moxley. Additionally, initial preparatory work on the framework study for Willenhall identified the need for a statutory Area Action Plan (AAP) given the extent of land-use change envisaged, and which is currently being produced. For the second tranche areas URBED consultants have recently been commissioned to produce the Framework Study for Darlaston and following some initial survey work it is intended to appoint consultants to prepare the Birchills study later in the year. Such Framework Studies are prepared through extensive engagement with local communities; a process that is managed through a Project Reference Group (PRG) nominated by the Local Neighbourhood Partnership (LNP) and comprising ward Councillors, local residents and key stakeholders.

As the Bentley Regeneration Framework was the first to be produced to date a number of the proposals have already been delivered or are in progress and has realised some significant investment, including £250K utilised to undertake an international design competition hosted by RIBA and that led to the appointment of high acclaimed architects Fashion Architecture Taste (FAT) to develop the library's design, circa £670K on enhancing the local centre public realm and securing funding from the Homes and Communities Agency to develop new homes on adjacent vacant sites to the library. Consequently, Brownhills, Moxley and Goscote Lane Corridor have therefore been identified as the basis for the first delivery phase of the SRF, known as the SRF1 programme.

The principle of establishing a Strategic Partnering Arrangement (SPA), jointly with whg, to deliver the SRF1 programme was supported by Cabinet in April 2008, which reflected Government advice and best practice in delivering regeneration

plans through innovative funding packages to create sustainable communities. In February 2009 Cabinet approved a Collaboration Agreement as the formal procedural basis between the Council and whg governing the joint working and delivery principles of the SPA. The governance arrangements will involve the membership of officers from the Council, whg, the HCA, AWM and the commissioned consultants within an agreed hierarchical structure comprising of the Executive Board, Steering Group and Working Groups (Finance / Planning and Housing / Project Management), which will be responsible for overall delivery, management and undertaking specific tasks respectively. The programme delivery will involve a Joint Venture Agreement between the Council, Walsall Housing Group (whg) and a developer partner(s) who will deliver new housing and other improvements in these areas in exchange for land currently owned by the Council (11%) and whg (89%), and with appropriate investment from the Homes and Communities Agency (HCA). Through the Joint Venture agreement and procurement of a developer partner, the project will assist in the successful delivery of:

- Major redevelopment projects in each of the areas;
- Rebalancing of tenure through an increase of owner occupation and lower proportion of social rented households;
- A significantly larger property type choice;
- Delivery of a total of 1418 dwellings within the areas including;
 - A total of 489 (34.5%) homes for rent
 - A total of 253 homes (17.8%) for shared ownership
 - A total of 676 homes (47.7%) for market sale
- A higher quality local environment in each area;
- Significantly improved community infrastructure for the area including significantly improved areas of open space.

In February 2009 Cabinet simultaneously agreed to receive a further report on the arrangements for managing issues of development clawback, the preferred social housing provider, and best consideration, which could previously not be resolved without the identification and agreement on the precise development model. In April 2009 Cabinet subsequently agreed to the principle of a Joint Venture development agreement as the development model with whg to deliver the SRF1 programme following advice sought from Ikon Consulting Ltd, and consequently a further report will be submitted to Cabinet in September 2009 regarding the unresolved arrangements of the Collaboration Agreement. Additionally, HBJ Gateley Wareing were recently commissioned jointly by the Council and whg to provide further legal advice on the preparation of the Joint Venture structure and agreement, which will be subject of a future Cabinet report. As a key contribution to this work extensive due diligence is being undertaken in respect of the proposed housing sites and the identification of community infrastructure projects.

The delivery of the SRF in Brownhills, Moxley and Goscote Lane Corridor is also being pursued in conjunction with the Homes and Communities Agency (HCA). The HCA are keen to participate in this comprehensive regeneration programme as part of their Single Conversation approach. The HCA have prioritised Walsall as both a strategic priority and a first phase single conversation in the region's emerging business plan, and remain committed to providing the solution and support needed to deliver the project. This will however depend on the speed at which the Single Conversation and the project can be progressed as the HCA do have limited funds

for investment of this scale. A strategy paper is being prepared for endorsement by the HCA's national projects board in September 2009 that will consider the Walsall Single Conversation Strategy, with the full investment plan to be subsequently approved of which the SRF project will form a substantial part. The preparation of both the strategy paper and the investment plan will be the HCA's most important business process with all future funding being allocated through this document. This approach was endorsed in early July when the initial Single Conversation for Walsall was endorsed and approved by HCA's regional board.

Background papers:

- District Centres Strategic Regeneration Framework – Cabinet report 22 March 2006
- Strategic Regeneration Framework Delivery Priorities – Cabinet report 18 October 2006
- Strategic Regeneration Framework: Strategic Partnering Arrangement – Cabinet report 16 April 2008
- Strategic Partnering Arrangement: Collaboration Agreement with Walsall Housing Group – Cabinet report 04 February 2009
- Strategic Partnering Arrangement: Development Model with Walsall Housing Group – Cabinet report 22 April 2009

Reason for scrutiny

The regeneration of the district and neighbourhood centres across Walsall Borough is a key initiative being implemented primarily through the Strategic Regeneration Framework (SRF) programme. It was therefore requested at the last Scrutiny meeting on 16th June 2009 that a report on the SRF programme be presented to Scrutiny and form part of the future work stream.

Resource and legal considerations:

Financial

It has been identified that a Joint Venture Development Agreement may offer the longer term benefits of a Strategic Partnering Arrangement without the set up and revenue costs associated with a Local Housing Company option. Joint Venture options are understood by the private sector and may be structured to achieve tax efficiencies for example via Limited Liability Partnerships which offer transparent tax treatment of returns.

Whilst the project will involve the delivery of mixed tenure housing the objective is to deliver larger volumes of affordable housing than would otherwise be the case using the planning process, which will have implications for the value of the Council's land in that this can reasonably be anticipated to lead to lower capital values than might be available were the land to be disposed of outside of the proposed Strategic Partnering Agreement. The impact of this will need to be considered in the context of the wider objectives of the project in delivering broader neighbourhood regeneration.

Notwithstanding the possible effects on Council land values, some of the sites would be less attractive in the market place given their location and size and current economic conditions. Therefore packaging such sites together represents the best solution to maximising their marketability. The integrity of the project, however, particularly in terms of investment from key partners, requires a momentum to be maintained. While there is recognition that land values are currently low there are mechanisms to ensure that uplift in a rising market can be captured and which will be a key element in preparing the Development Agreement with our developer partner. The timing also reflects a commitment to those communities that have an expectation of investment in the regeneration of their areas and particularly as a response to the effects of the economic downturn.

Given the uncertainty in the property market attempting to value the council's land holdings at this time would be difficult and of limited value. As the scheme progresses further development appraisals will be undertaken. The council's land equates to approximately 11% (4.73 ha.) of the total land that will form the project and largely comprises small residual sites excluded from the LSVT. In effect the values inherent in the council - and indeed whg – owned land in the three areas will be essentially ring fenced and reinvested in those areas in the form of community infrastructure which will help to achieve corporate objectives across a range of services. These details will be reported to Cabinet before the final scheme is approved.

The whg Board agreed to the preferred Joint Venture Option as the development model for the Strategic Partnering Arrangement (SPA) with the Council on 21st April 2009. Simultaneously the whg Board endorsed the principal of putting their land, equating to 89% of the land (35 hectares) within the project, into the development model at nil value with an expectation of a return in whatever form to be captured later in the programme. This therefore reflects the same principles of the Council forgoing a capital receipt at the beginning in order for value to be created later in the overall project. Value created, calculated through an agreed formula as part of the preferred Joint Venture structure, would be used to contribute to providing a greater proportion of affordable housing and wider community infrastructure. Whg will have to pass through a series of rigorous tests with the Charity Commissioners to achieve this. They will have to demonstrate that the overall project is within their charitable objectives and will benefit the community - not unlike the Council's requirement to demonstrate economic well being. Clearly the shared vision of whg and the Council for these areas, and the partnership created, will assist in making a robust case to the Charity Commissioners. It is to be noted that there are precedents for this arrangement between Local Authorities and Housing Associations.

There will be implications for development clawback – that is the difference in value between whg's land developed for social housing and that offered to the open market. The development clawback is currently directed through the VIEW fund for regeneration projects. Operationally an amended development clawback option that reflects both the Council's and whg's intentions to remove clawback and reinvest their respective one third shares generated from land assets in the three SPA areas back into the regeneration of those areas on a transparent and accountable basis represents a simple and value for money option. It should be noted that given the expectation of delivering a larger proportion of affordable / social housing the proportion of clawback would be reduced in any event.

Additionally, the HCA will appraise the scheme for value for money once the Single Conversion strategy paper is approved and it will be necessary to show clear outcomes from this project to justify HCA investment and a commitment from the Council to reinvest any potential receipts in the 3 areas in return. It will be important therefore, that the Council and whg are able to demonstrate to HCA that the project is progressing and is capable of showing clear synergies and phased outputs for each of the areas that complement initiatives such as Transforming Learning, health provision and reflect Local Area Agreement targets through the Local Strategic Partnership.

Legal and Procurement

The project will involve a legal contract as part of the Joint Venture Development Agreement between the Council, whg and the developer partner to involve the transfer of land assets in exchange for the delivery of the SRF programme in the three areas. On behalf of the Council, Cobbetts LLP previously provided detailed legal advice at the stage of assisting with and identifying the Collaboration Agreement and the development model. HBJ Gateley Wareing has recently been jointly appointed by the Council and whg to provide further external legal advice in connection with the preparation of the JV development agreement structure and procurement and appointment of a developer partner(s).

Staffing

The project will continue to be led, in conjunction with colleagues in Estates and Assets and at whg, by the established SRF Team within the Regeneration Directorate. The delivery of the SRF is one of three strategic priorities for the Directorate particularly within the Development and Delivery service and staff will be deployed to support whg and the developer partner.

Since April 2008 detailed discussions with the Homes and Communities Agency have taken place. They have given support to the process proposed by the Council in the joint delivery with whg of the SRF programme and, in principle, to becoming both project and investment partners. A Steering Group involving the Council, whg and HCA has been formed to progress the project to which a number of separate work streams will report. The HCA's role as a critical partner in shaping the programme is reflected in the governance arrangements that involve them playing a key role on the Executive Board, steering group and working groups, and fundamentally through the joint working towards the Single Conversation that contributes to the strategic context for the project in their spending profile. Discussions with AWM have also taken place to begin to embed the project in future funding programmes.

Citizen impact:

Through the development model and procurement of a developer partner, the project will assist in the successful delivery of:

- Major redevelopment projects in each of the areas;
- Rebalancing of tenure through an increase of owner occupation and lower proportion of social rented households;
- A significantly larger property type choice;

- Over 1,400 dwellings within the areas;
- A higher quality local environment in each area;
- Significantly improved community facilities for the area including significantly improved areas of open space.

The project also has the potential to make significant 'inroads' into tackling wider economic and social issues and strategies such as:

- Worklessness (46% and 41% economically inactive in Goscote Estate and Moxley), particularly through supporting procurement and creating jobs and training opportunities for local people through Think Walsall
- Low educational achievement (62% and 54% have no qualification in Goscote Estate and Moxley)
- Health inequalities (Limiting life long illness 46% and 45% of households in Goscote Estate and Moxley)
- Disengagement particularly by younger members of the community

By focusing on the economic and social outputs in addition to the physical and environmental regeneration the maximum positive impacts and enhanced areas for citizens of Brownhills, Moxley and Goscote Lane Corridor is anticipated through the project. In partnership with the local community and other agencies this will also lead to greater local pride and citizen involvement.

Environmental impact:

The project will transform the environment of the areas by redeveloping vacant sites, creating high quality new dwellings, removing eyesores and improving open spaces. Fundamentally the project aims to deliver transformational improvement to the environment of these priority neighbourhoods.

The chosen developer partner(s) will be expected to sign-up to the Council's Think Walsall strategy and support innovation in the delivery of the regeneration projects including creation of environmentally sustainable, low carbon communities through development models that are also environmentally friendly.

Performance management:

The delivery of the SRF projects is a priority within the 2009 / 2010 Regeneration Service Plan, and managed through established performance arrangements. Technical project teams reporting to the Project Reference Groups will drive and monitor delivery the Strategic Partnering Arrangement.

The redevelopment of large former housing areas such as the Harrowby Road, Poets and Goscote estates and the High Street / Lindon Drive area of Brownhills will make a contribution to future brown-field housing completions. The provision of the right type of new housing and affordable housing will contribute to National Indicators; 'Net additional homes provided' (NI154) and 'Number of affordable homes delivered' (NI155).

The Black Country's growth proposals have been prepared by the joint planning team drafting the Joint Core Strategy for the sub-region, including Sandwell,

Dudley, Wolverhampton and Walsall. Based on the emerging Preferred Option of the Joint Core Strategy (which builds on the Spatial Strategy set out in the recently approved Regional Spatial Strategy (RSS) Phase One Revision), the Black Country Consortium is leading a sustainable Growth Programme focused on four Strategic Centres and up to 16 Regeneration Corridors. The growth programme proposes an increase of 32,850 dwellings between 2007 and 2016 - 19 per cent more than the minimum required by existing RSS. SRF1 will therefore assist in meeting these growth point proposals.

Equality Implications:

The delivery of the SRF, through the development model and developer partner procurement, will bring benefits to the whole of the Brownhills, Moxley, and Goscote Lane Corridor communities. The redevelopment of sites, the enhancements to the local environment and the provision of new housing will present opportunities to engage with many sectors of the community and ensure issues of equality and accessibility are taken into account.

As part of the comprehensive tendering process the equality and diversity practices of the prospective developer partner(s) will be fully assessed and the appointed partner(s) will need to have demonstrated a commitment to this agenda.

The Council is seeking to achieve the highest possible level in the Equality Standard for Local Government. As part of this we are seeking to ensure that wherever possible our activities ensure a positive impact is made on people / communities using the 6 equality themes / strands. The companies who tender to become a developer partner(s) will be expected as a minimum to support both the Council and whg's equality and diversity policies. They will be required to highlight how their company will ensure the regeneration benefits for people based upon:

- Gender
- Ethnicity
- Age (i.e. young and old)
- Sexuality / sexual orientation
- Religion and or belief
- Disability

The project covers broad strategic issues therefore it is felt that Equality Impact Assessments (EQIAs) will be undertaken in the future when these broad issues are broken down into specific delivery elements.

Consultation:

- Estates
- Housing Strategy
- Legal Services
- Finance

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1. Report

1 Strategic Regeneration Framework (SRF)

1.1 The SRF plays a major role in the regeneration of the Borough being one of three strategic regeneration priorities complementing the initiatives being delivered in the Walsall Regeneration Company (WRC) area and the strategic corridors. The SRF was agreed by Cabinet in March 2006 and is being pursued jointly with whg and other key partners, particularly the HCA, based around housing-led regeneration with the objective of securing sustainable mixed communities. Spatially the thrust of the SRF is dominated by the key district and local centres and their surrounding neighbourhoods. The first tranche of spatial priorities in Brownhills, Willenhall, Bentley, Moxley and Goscote Lane Corridor were agreed by Cabinet in October 2006, and subsequently the second tranche in Darlaston and Birchills were agreed in June 2008 and November 2008 respectively. Framework Studies that identify the housing proposals and wider community benefits have been prepared and agreed by Cabinet in the first tranche areas of Bentley, Brownhills, Goscote Lane Corridor and Moxley. Additionally, initial preparatory work on the framework study for Willenhall identified the need for a statutory Area Action Plan (AAP) given the extent of land-use change envisaged, and which is currently being produced. For the second tranche areas URBED consultants have recently been commissioned to produce the Framework Study for Darlaston and following some initial survey work it is intended to appoint consultants to prepare the Birchills study later in the year. Such Framework Studies are prepared through extensive engagement with local communities; a process that is managed through a Project Reference Group (PRG) nominated by the Local Neighbourhood Partnership (LNP) and comprising ward Councillors, local residents and key stakeholders. The delivery of the SRF in these areas is aimed at achieving social, economic and environmental regeneration, through housing (private and affordable), public realm, environmental works, social and community benefit, enterprise and business support, job opportunities, and maximising the widest community benefit. The comprehensive regeneration of these neighbourhoods is also reflected in the approach to the Building Schools for the Future (BSF) programme which aims to link the learning transformation with a broader delivery of services and collocation considerations by both the council and partner organisations.

2 Strategic Regeneration Framework 1 (SRF1) – Collaboration Agreement and Joint Venture Developmental Agreement

2.1 Achieving comprehensive regeneration demands an innovative approach and Government has encouraged local authorities and their partners to adopt more strategic solutions in working with the private sector particularly where significant public sector landholdings are involved, as per the 2007 Housing Green Paper, Callcutt and Barker review recommendations. In April 2008 Cabinet agreed for the Council to establish a Strategic Partnering Arrangement (SPA) jointly with Walsall Housing Group (whg) to strategically deliver the SRF programme initially in Brownhills, Moxley and Goscote Lane Corridor (known as SRF1) where the Council (11%) and whg (89%) own major areas of land identified as being suitable for housing redevelopment through the Framework Studies equating to approximately 43 hectares. Fundamentally the SPA is based on:

- identifying a development model and delivery partner based on the reinvestment of some or all of the values liberated from the disposal of the

combined Council and whg land assets to deliver sustainable housing-led regeneration;

- providing the private sector with a significant opportunity, and therefore;
- maximising leverage for both land owners;
- supporting local procurement and creating jobs and training opportunities for local people and businesses through the 'Think Wasall' approach.

2.2 This will enable both whg and the Council to deliver comprehensive regeneration; housing (private and affordable), public realm, environmental works, social and community benefit, enterprise and business support, job opportunities in a range of areas that local people will be able to take up. By contributing significant strategic land assets owned by both the council and whg to a developer partner the resulting values would be transmitted into tangible local improvements delivered in tandem with significant levels of new homes to help create sustainable mixed communities. To support this project WHG has also now become an Investment Partner of the Homes and Communities Agency (HCA).

2.3 To give effect to the SPA in February 2009 Council Cabinet agreed to the formal Collaboration Agreement with whg governing the procedural basis for joint working and setting out the aims, objectives and terms of the regeneration partnership for the SRF1 areas, which covers;

- Developer Selection
- Development Clawback/VIEW Fund
- Affordable Housing Provider
- Specialist Housing Provider
- S106 Agreements/Planning Obligations/Planning
- Land Value and Receipts
- Land Ownership
- Investment / Grants
- Level of Affordable Accommodation
- Comprehensive Regeneration Package
- Cross-subsidy of SRF Projects

2.4 The Collaboration Agreement is therefore key to:

- Obtaining a private developer partner(s) to deliver the entire programme
- Legally enshrining principles for investment/re-investment and project delivery
- Setting out the aims and objectives of the project including the development requirements
- Giving confidence and certainty to developers, HCA and Advantage West Midlands that a partnership exists between the Council and whg to deliver new development
- Encouraging other partners to participate in this collaboration
- Securing investment from other agencies such as HCA and AWM
- Assisting in the deployment of land assets and distribution of community benefits
- Securing a level of investment to comprehensively and strategically regenerate areas

- Enabling the Council and whg to negotiate significant value and leverage out
- of the OJEU tender process
- Securing strategic funding from the ERDF North Black Country Sustainable Urban Development (SUD) fund

2.5 Further to the Collaboration Agreement an external study was jointly commissioned and undertaken by Ikon Consultancy Ltd that essentially compared the benefits and drawbacks of the different development options and also analysed the options against the agreed evaluation criteria and weightings provided by the Council, whg and the HCA, which was also supported by workshop and interview sessions with respective colleagues. The development options evaluated were:

- Local Housing Company (LHC)
- Joint Venture development agreement (JV)
- Traditional land sale option
- Private Finance Initiative (PFI)
- Local Asset Based Vehicle (LABV)

2.6 Subsequently it was concluded, and agreed in principle by Cabinet in April 2009, that a Joint Venture development agreement is the preferred development model with whg as the basis for delivery. In reaching this conclusion the Council and whg have identified a programme of development sites across the three SRF areas of Brownhills, Moxley and Goscote Lane Corridor that includes;

- Delivery of a total of 1418 homes
- Development period starting in terms of construction in 2010 in Goscote and completing in 2018 in Brownhills
- A total of 489 (34.5%) homes for rent
- A further 253 homes (17.8%) for shared ownership
- A total of 676 homes (47.7%) for market sale

2.7 Now that the preferred Joint Venture development model has been identified further consideration can be given to the arrangements for managing issues of Best Consideration, the preferred social housing provider and Development Clawback, as these matters could previously not be resolved particularly without identification and agreement on the development model. The detailed arrangements and implications of these issues will be the subject of a Cabinet report in September 2009. Additionally, HBJ Gateley Wareing was recently jointly commissioned by the Council and whg to provide further legal advice on the preparation of the Joint Venture structure and agreement.

3 Homes and Communities Agency (HCA) – Single Conversation

3.1 The delivery of SRF is also being pursued in conjunction with the Homes and Communities Agency (HCA). The HCA are keen to participate in this comprehensive regeneration programme as part of their most important business process - the Single Conversation approach. By working in an open and transparent way with local authorities, the HCA aims to become local government's best delivery partner, able to secure more and better outcomes than through a top-down, centralised approach. The term 'Single Conversation' refers to its comprehensive coverage – including the full range of housing,

infrastructure, regeneration and community activities that are within its scope. The Single Conversation is an ongoing, iterative, dynamic process over time and at any point will reflect the maturing relationship between the parties engaged. It will always be a negotiation and at its core will be a shared vision and objectives for places. The Single Conversation will enable partners to:

- Bridge location, ambition, and national targets
- Achieve the shared vision through a shared investment agreement
- Agree and secure local delivery
- Achieve positive outcomes for people and places

3.2 The HCA have identified Walsall as both a strategic priority and a first phase Single Conversation in the region's emerging business plan, and remain committed to providing the solution and support needed to deliver the SRF1 project. This will however depend on the speed at which the Single Conversation and the project can be progressed as the HCA do have limited funds for investment of this scale. A strategy paper is being prepared for endorsement by the HCA's national projects board in September 2009 that will consider the Walsall Single Conversation Strategy, with the full investment plan to be subsequently approved of which the SRF1 project will form a substantial part. The preparation of both the strategy paper and the investment plan will be the HCA's most important business process with all future funding being allocated through this document. This approach was endorsed in early July when the initial Single Conversation for Walsall was endorsed and approved by HCA's regional board.

4 What's Next

4.1 Key milestones to be completed before March 2010 include:

- Walsall Council Cabinet further report on the Collaboration Agreement on issues the preferred social housing provider and Development Clawback (future of the VIEW fund).
- Priority list of community benefits endorsed and agreed by whg and Walsall Council
- Pre-planning process consultation
- Outline planning applications
- Site investigations on Council owned sites
- Complete investigation on Land Registry Titles
- Review resources
- Develop the detailed financial terms of the Joint Venture agreement and finalise in a Full Business Case.
- Partners to agree the process for selecting a developer partner(s) based on the agreed development model and commence the OJEU process
- Report on the Best Consideration implications for Council-owned land
- Whg Board approvals / updates when required
- Walsall Council Cabinet reports / updates when required

5 Future SRF Phases

5.1 Coinciding with the current and on-going works achieved to date in the SRF1 priority areas and the remaining SRF areas still to come forward the potential future programme and HCA funding assistance can be divided into three main

phases. Phase 1 focuses specifically on delivering housing and area regeneration in the SRF1 areas of Brownhills, Moxley and Goscote Lane Corridor, which is currently being brought forward and pursued as discussed earlier. Phase 2 involves delivering regeneration in Darlaston, Birchills and Willenhall following the completion of the Framework Studies in early 2010 and adoption of the AAP in June 2011 respectively. These are likely to include significant regeneration projects such as comprehensive housing renewal; new housing developments; improvements to community facilities and public spaces; development of new businesses/social enterprises; and community-led projects, which will require sufficient partnership working and resources to successfully deliver. Subsequently, Phase 3 would involve the regeneration of the remaining SRF areas of Aldridge and Bloxwich and other schemes as they come forward.