

## Consultation on the Policy Statement on Regional Strategies and Guidance on the establishment of Leaders' Boards

### Response by Wildlife and Countryside Link October 2009

Wildlife and Countryside Link (Link) brings together 37 voluntary organisations concerned with the conservation and protection of wildlife and the countryside. Our members practise and advocate environmentally sensitive land management and encourage respect for and enjoyment of natural landscapes and features, the historic environment and biodiversity. Taken together our members have the support of over 8.3 million people in the UK and manage over 690,000 hectares of land. Our joint response therefore focuses on key issues of collective concern. It is supported by the following 12 member organisations:

- Badger Trust
- Butterfly Conservation
- Campaign to Protect Rural England
- Campaign for National Parks
- Council for British Archaeology
- Friends of the Earth England
- Open Spaces Society
- Royal Society for the Protection of Birds
- The Wildlife Trusts
- Woodland Trust
- Wildfowl & Wetlands Trust
- WWF – UK

#### 1. Summary

Wildlife and Countryside Link has tracked the emergence of new regional strategies and structures since a number of Link members produced their *How Green is My Region* research in July 2007. This original research considered how well regional government and policy making had contributed to environmentally sustainable development.

The research found that despite the good intentions of many regions to shift to becoming environmentally sustainable, bio-diverse and low carbon regions and economies, their efforts were often derailed by requirements to comply with Central Government objectives and policies which were frequently at odds with achieving sustainable development. The research also identified concerns about how well decision making tools such as Sustainability Appraisal had been used to fully inform decisions about strategy making.

We recognise that the guidance demonstrates how much the Government's thinking about regional planning has evolved since our early discussions with the Department for Communities and Local Government (CLG) and other departments regarding the Sub-National Review (SNR) and its implications. Greater clarity about the value and role of quality stakeholder engagement and the need for sustainable economic activity which starts to operate within environmental limits are particularly welcome developments.

We note, however, that the main thrust of the proposed Regional Strategies and the role of the Leaders' Boards remains the meeting of Central Government objectives for

economic and housing growth, rather than being about ensuring delivery of genuine sustainable development.

As such, we find that the draft policy is still likely to continue the marginalisation of sustainability in itself as a desirable outcome, sustainable development as a means of delivering desirable outcomes, and the needs of the environment, and especially the natural environment which warrants respect in its own right as well as for the well being, health and recreational benefits we all receive.

Quality stakeholder engagement is crucial to the credibility and viability of new regional arrangements. Our regional members have already witnessed the removal or revision of existing forums and other means of securing meaningful stakeholder engagement as a direct consequence of the SNR proposals. This is affecting our ability, as part of the community and voluntary sector, to engage, assist and support new regional structures and policy formation.

The variety of new arrangements which are emerging will be tested by their accessibility for all stakeholders and, most crucially, their efficacy in aiding the production of sustainable policies commensurate with the role of regions in meeting challenges of sustainable economic growth and development.

Since regions are already preparing their new strategies more work is required to rapidly develop both the national core sustainability framework and the guidance on how to define environmental limits. It is important that this work remains fully in step with the compilation of regional evidence bases and draft strategies and informs iterative assessments such as Sustainability Appraisals.

We remain keen to advise, support and engage with the Government in these areas of work to ensure that regional evidence bases and strategies are properly informed by sustainable development frameworks, environmental limits and meaningful engagement with new regional bodies.

## **2. Main comments**

### **Sustainable regional development**

The *How Green is My Region*<sup>1</sup> research found that despite many regions' good intentions and aims to become environmentally sustainable, biodiverse and low carbon regions and economies, their efforts were frequently derailed or undermined by requirements to comply with Central Government objectives and policies which were, more often than not, at odds with achieving sustainable development.

Based on direct conversations with Regional Development Agencies (RDAs), Regional Assemblies and others, the root cause for regions' inability to make sufficient progress was frequently stated as being due to the Government's focus on narrow forms of economic growth. In interviews, regions highlighted concerns, for example, that despite their reservations they were effectively required to persist with environmentally irresponsible economic activity such as aviation and transport growth, contrary to their efforts to implement policies on sustainable development which they were also seeking to put into place.

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<sup>1</sup> CPRE, Friends of the Earth England and WWF-UK (2007) *How Green is my Region?* See [www.cpre.org.uk/news/view/410](http://www.cpre.org.uk/news/view/410) or [www.foe.co.uk/england/news/how\\_green\\_is\\_my\\_region.html](http://www.foe.co.uk/england/news/how_green_is_my_region.html)

The research also identified concerns about how well decision making tools such as Sustainability Appraisal (SA) have been used to fully inform decisions about strategy making. The research recommended that SA should take place earlier in the policy-forming process if unsustainable actions and trends were to be avoided.

Given the findings of the *How Green is my Region* research we welcome paragraph 4.2 which suggests that regions will be able to divert from national policy where they feel it is justified. Responsible regional authorities must use SAs and Habitats Regulation Assessments (HRA) rigorously in developing options for the regional strategies. We also welcome the commitment in paragraph 5.29 that preparation of the SA should start as early in the process as possible.

An important means of assuring that the full range of sustainability issues are covered adequately would be by ensuring that there is RDA and Leaders' Board level environmental representation in the new structures. The current tendency is for the Government to appoint new RDA board members primarily on the grounds of business expertise with one member holding an environment portfolio. Since the environment is now a mainstream matter rather than a minority issue, in addition to having an environment champion, responsible regional authorities should ensure the environment portfolio is spread across their board members to embed knowledge and further mainstreaming.

### **Sustainable economic growth**

The new Regional Strategies offer a fresh start and a means for the Government to put in place the building blocks for regions to truly contribute to sustainable economic recovery which respects environmental limits. The Government should now work with the responsible regional authorities to ensure that this is the case.

We welcome the reflection of the PSA7 definition of 'sustainable growth' in the guidance and its link to work being initiated to define environmental limits. We recognise current early work by Defra to define environmental limits separately. A greater sense of urgency is now required to ensure that this work is prioritised so that the early development of Regional Strategies starts from the right place and is fully informed by a credible evidence base. It is disappointing that this valuable work has not been undertaken sooner as this would have been valuable for stakeholders to consider such guidance alongside this consultation.

### **Developing Regional Strategies**

We recognise that the Government seeks slimmed down Regional Strategy documents and understand the specific benefit of this in terms of communicating with wider public audiences. However, the ability to properly engage in the development and assessment of credible strategies now depends on the clear availability of all related documents and policies.

As we understand the current proposals, information will be spread between a succinct strategy, an evidence base and an Implementation Plan. This is not acceptable if Implementation Plans will not be tested in the Examination in Public (EiP) (see 5.48) or by going through an SA/SEA. As such, the straightforward remedy is for the policy document to be revised to clarify that Implementation Plans and subsequent revisions will be tested through an SA and an EiP.

While there may be no legal requirement for Implementation Plans to be tested through the EiP process we urge the Government to consider encouraging Inspectors to see testing it as best practice. As paragraph 5.48 highlights 'it will be an important factor in assessing the realism and soundness of the overall strategy' and so should play an

important role in enabling the Panel to decide whether a strategy is really deliverable. It is also essential that the SA should also consider Implementation Plans in detail. If Plans are not to be tested further consideration is needed as to how the Government will ensure that the Plan will actually deliver the strategy.

### **Quality stakeholder engagement**

The success of new strategies rests to a fair degree on the buy-in of regional stakeholders and the public. The development process itself must meet high standards of transparency and responsible regional authorities must adopt innovative, accessible and consistent means of engaging local communities.

Obscure, inaccessible forums and means of engagement will close down opportunities to ensure a consistent and reliable presence from environment organisations and their contacts in wider civil society. As Leaders' Boards have stepped in to assume control during 2009, we are aware that well-established and previously accessible forms of stakeholder engagement have been dismantled across some regions. Where some regions are in the process of setting up new structures and forums we are currently experiencing a patchwork of arrangements ranging in their accessibility and familiarity.

Some of our members have already identified that their new forums are less accessible, more complex and / or more numerous than before and this is already affecting many of our members' ability to engage and provide support and advice to the new bodies. Should this undesirable trend be allowed to continue in some regions, there will be a greater distance between stakeholders and decision-makers within the new structures. This in itself will marginalize the environment and sustainability as showing signs of developing, for example, in the West Midlands. This greater distance will also be a risk to effective monitoring and scrutiny.

Policy makers can continue to benefit from our members' role, via accessible forums, in testing and refining their plans and, through this work at regional level, facilitate and support the involvement of others in wider society. While we welcome paragraphs 5.15 and 5.19, in some regions, ensuring that this is more than just rhetoric will be challenging. The Government should now work with all responsible regional authorities to make sure that stakeholders are involved, rather than simply consulted, in the development of strategies and plans in meaningful ways.

### **Effective monitoring and scrutiny**

Regions are to be required to produce annual monitoring reports but it is not clear how these will be used and publicised.

Scrutiny is also insufficient and we are concerned that the hastily formed Regional Select Committees do not have the time, resources and competence to undertake this role. Currently all such Committees comprise only Labour MPs and meetings take place too infrequently to ensure proper learning and scrutiny. The current provision of a vague measure of democratic scrutiny is no substitute for proper, well informed scrutiny of the development and implementation of each region's strategy.

## **Wildlife and Countryside Link October 2009**

