

CONSULTATION ON 'PROSPEROUS PLACES: TAKING FORWARD THE REVIEW OF SUB NATIONAL ECONOMIC AND REGENERATION'

Response by Wildlife and Countryside Link

June 2008

Wildlife and Countryside Link (Link) brings together 40 voluntary organisations concerned with the conservation and protection of wildlife and the countryside. Our members practice 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 million people in the UK.

Link welcomes the opportunity to respond to the Government's '*Prosperous Places*' consultation on implementing the Sub-National Review of economic development and regeneration. We believe that such fundamental reforms, which are primarily economically-driven, are vital to get right if economic development and regeneration is to take place in the context of genuinely sustainable development.

This response is supported by the following 18 member organisations;

- Association of Rivers Trusts
- Badger Trust
- Buglife – The Invertebrate Conservation Trust
- Butterfly Conservation
- Council for British Archaeology
- Campaign for National Parks
- Campaign for the Protection of Rural England (CPRE)
- Friends of the Earth England
- The Grasslands Trust
- Herpetological Conservation Trust
- Open Spaces Society
- Plantlife International
- The Ramblers' Association
- Royal Society for the Protection of Birds (RSPB)
- The Wildlife Trusts
- Woodland Trust
- Wildfowl & Wetlands Trust (WWT)
- WWF – UK

1.0 Summary of key points

- Make sustainable development the explicit, overarching goal and context for the Single Regional Strategies
- Create Regional Sustainable Development Agencies with a new, stronger sustainable development duty.
- Adopt the use of indicators to measure all three components of progress: economic well-being, societal well-being, and environmental well-being.

- Put in place an effective mechanism to achieve ‘sustainable growth’ (as defined by the Government) that enables society to live within environmental limits.
- Establish minimum standards for civic engagement that explicitly include environment stakeholders to ensure effective policy development, and adequate scrutiny and accountability arrangements.
- Ensure that new Regional Strategies are robustly assessed and scrutinised, contribute to the achievement of sustainable development, and deliver both protection and enhancement of environmental resources.

2.0 Introduction

We welcome the limited statements in the consultation document ‘*Prosperous Places*’ that reforms set out in the Review of Sub-National Economic Development and Regeneration published in July 2007 will uphold ‘*the principles of sustainable development at the heart of our plans for Britain’s future*’, will ‘*lead to better decision-making, better integration of economic, social and environmental goals*’ and that implementation of these reforms will be ‘*in a way that ensures we achieve growth that is environmentally sustainable and makes the transition to a low-carbon economy*’ (Ministerial Forward, p1-3).

Despite the Government’s clear objectives to deliver sustainable development, shift to low carbon economies, and reverse wildlife species and habitat decline (as recently reported in Natural England’s *State of the Environment* report), Link holds genuine concerns over the overall intention of the Sub National Review (SNR) reforms. We question the extent to which they will enable the economy to operate within environmental limits, or lead to improved outcomes for wildlife, habitats, landscapes and the practical delivery of sustainable development. These proposals could be seen as potentially contradictory, with apparently unchanged forms of economic growth being pursued on the one hand, with commitments to shift to low carbon sustainable economies on the other.

Although the Government says that the proposals are within the context of sustainable development, the opportunity has not been taken in the consultation document to be explicit about what this will mean in practical terms. Link is therefore cautious about what forms of economic activity and ‘business as usual’ activity will take place under the proposed reforms and whether or not this will mark a shift away from environmentally damaging forms of economic development.

The onus is on Government in the implementation plans and legislation phases to be explicit about the practical delivery of sustainable development and sustainable economic growth, and the duties required of Regional Development Agencies (RDAs) and Local Authorities to ensure this.

Our response therefore centres on the following aspects of the consultation:

- The need for reforms and spatial planning to result in sustainable development;
- The ‘alignment’ of spatial and land use planning to deliver primarily economic objectives;

- The overriding aim of achieving Government's central objective of 'high and stable rates of economic growth' at the expense of other social and environmental aims;
- The new heightened role of RDAs and Local Authorities, including the duty to carry out economic assessments of their areas.

3.0 Dominant economic agenda

The objectives of the SNR are overtly economic, with overriding aims to achieve '*high and stable rates of economic growth*' in each region and to deliver the Government's central economic and housing growth objectives, which it regards as the keys to the future prospects of all regions.

The SNR proposals do not set a central objective which would give reassurance that these economic objectives will take place in a sustainable way. Link is disappointed that the opportunity has been missed to make sustainable development the prime aim for all regions under which economic development should take place. Given Government's commitment to the principles of sustainable development, an integrated approach to sub national reform should pose no difficulties for Government if its statements about the intentions of the reforms are to be taken as credible.

We are greatly concerned that the SNR reforms fail to acknowledge that economic activity is dependent on environmental quality. If economic development takes place in ways which degrade local, regional and global environments, these reforms will perpetuate unsustainable development and will be socially unjust and economically short lived.

We recommend that to bolster the Government's stated interest in the reforms leading to sustainable economic development, a requirement that regional and local bodies deliver sustainable development should be added to the narrow economic central objectives. This will ensure that low carbon, high quality environments, rich in biodiversity, are at the heart of the Government's plans.

4.0 Land and spatial planning

The fundamental purpose of planning (as set out in *Planning Policy Statement 1: Delivering Sustainable Development* (PPS1)) is to integrate social, environmental, and economic factors to secure outcomes that benefit society generally and improve people's quality of life. However, the focus on economic growth within the SNR proposals contradicts current planning policy and the Government's own commitments to integrated sustainable development set out in the UK Sustainable Development Strategy: *Securing the Future* (2005) and *Securing the Regions' Futures* (2006).

The SNR is geared toward using planning as a tool to deliver primarily economic development. We are concerned at the on-going alignment of spatial and land use planning as a tool mainly to meet economic growth objectives. The Government should be more explicit about how economic development and land use planning will deliver sustainable development.

Further, Link is concerned over plans to give the RDAs control over spatial and land use planning given that RDAs have so little experience of planning matters and come

to the discipline from a purely economic rather than a more holistic perspective of integrated sustainable development. For example, where an RDA has a conflicting requirement, such as targets to increase the rate of development on previously developed / brownfield land against the need to protect the biodiversity found on that land, decision makers should be required to give equal weight to environmental sustainability alongside economic and social interests.

5.0 Duties to deliver sustainable development

The RDAs will have a '*regional economic growth objective to focus attention on how best to raise growth and increase prosperity*'. We do not support the Government's suggestion that the existing sustainable development duty on RDAs is sufficient to ensure delivery on this over-arching agenda. The overt focus for the RDAs is economic and not sustainable development, and this must be corrected in the SNR implementation.

This is compounded by inadequate measures of progress and Government's insistence that Gross Value Added (GVA) is *the* measure of success. GVA is a blunt measure that does not adequately track real improvements in quality of life or environmental decline caused by unsustainable economic activity. We would welcome the use of indicators to measure all three components of progress: economic well-being, societal well-being, and environmental well-being.

Link suggests that the RDAs should be re-styled as 'Regional Sustainable Development Agencies' (RSDAs) to reflect how RDAs need to change from being purely economic focused to delivering sustainable development and, as such, treating economic, social and environmental issues equally and together.

We urge the Government to update the RDAs' statutory duty to deliver sustainable development and to make this their primary role. This is consistent with the requirement for RDAs to develop a Single Integrated Regional Strategy combining land use and spatial planning, transport, housing and economic development etc – all of which fall under the banner of sustainable development and require a broad, joined up and integrated approach to policy formation and decision making.

6.0 Single Integrated Regional Strategies

The consultation document sets out the Government's commitment to develop Single Regional Strategies that will secure an integrated approach, and lists the policies and spatial priorities that every regional strategy is expected to cover (p30-31). Link acknowledges the importance of proposing a wide array of aspects for consideration by the RDAs in drawing up strategic plans. We believe that this demonstrates the breadth that will be required of the Regional Strategies and further illustrates the need for the prime purpose of the RDAs to be consistent with the main purpose of planning – sustainable development.

As well as meeting the climate change challenge, each region faces pressing natural environment challenges with many regions and parts of regions suffering significant habitat and species decline, as well as loss of landscape features and character. Rectifying and reversing these will be key to improving the welfare and wellbeing of regions, their populations, and local and regional economies, as well as other aspects which the Government states Regional Strategies should cover. Single

Integrated Regional Strategies will require robust assessment and scrutiny (through sustainability appraisal) to ensure the achievement of sustainable development and the delivery of both protection and enhancement of environmental resources.

7.0 Local Authority economic assessment duty

Link remains unconvinced that a statutory economic assessment duty for upper tier and unitary authorities, i.e. at local authority level, is required. We recommend that Government be explicit that the proposed new legal duty be geared toward an overall outcome of practical delivery of sustainable development. This is necessary to ensure that the proposed new duty does not override both the sustainable development duty that was placed on local planning authorities in section 39 of the Planning and Compulsory Purchase Act 2004, and the biodiversity duty contained in section 40 of the Natural Environment and Rural Communities (NERC) Act 2006. Respecting the limits of the environment, natural resources and biodiversity is fundamental to achieving a sustainable economy and will not be achieved by placing an economic duty on Local Authorities.

8.0 Accountability and scrutiny

It is unclear within the consultation document as to who will scrutinise the activities of both the RDAs and the Local Authorities. There is concern that Local Authorities could use their proposed heightened role in regional decision making to demand priority and funding for pet projects (such as road schemes) which may have significant environmental effects. Link recommends that before the SNR implementation is completed, the Government brings forward clear plans for how and which bodies will appraise the regions.

9.0 Role of environment bodies in policy formation

The consultation is vague about the important role of environmental organisations in helping to devise robust policy. It will be of value to RDAs, Local Authorities and others to ensure that environmental organisations are fully and properly involved – and that there are the mechanisms to achieve this – in the development of policy and in decision-making at the regional level. This should be part of establishing sound and good practice engagement with the environment, community and voluntary sectors to build on some of the good practice involvement established to date by certain Regional Assemblies

For example, the West Midlands Regional Sustainability Forum, comprised of a range of environmental groups, has played an active role in the Regional Planning Partnership and Executive, advising on the development of key strategies including the West Midlands RSS. Good practice engagement and involvement has led to a wide range of environment bodies becoming actively involved in several scrutiny panels, such as on sustainable development, and the development of sustainable transport options for the region.