

## **TOPICS FOR FUTURE POLICY REVIEWS**

1. This paper summarises the outcome of the recent trial policy reviews (PC Mins 51/10 and 52/10) and seeks PC's advice on which policy areas to review next.

### **Background**

2. At its meeting in December the Trustee Board considered the revised policy positions on transport and coastal issues following consideration of earlier drafts by PC. The Board agreed to adopt the positions as revised, rename them as 'Policy Guidance' to reflect their purpose more accurately, and to proceed with further policy reviews taking account of the outcome of the trial reviews and the views of the Policy Procedures Review Group.

3. Key considerations arising from the trials included: the critical role of the chair of the review group; the need to encourage the active involvement of branches and volunteers; the importance of keeping the review timescale tight (ideally under six months); clarity about the internal and external role of the policy positions; and the importance of effective internal communications to secure better buy-in across the organisation. The Board agreed that it was appropriate that the new Policy Guidance notes (PGs) did not follow the same format given their very different subject matter, and that shorter, summary statements should be prepared in line with the PGs for wider public consumption. The Board was concerned that branches should be encouraged to abide by PGs prepared under the new procedures.

4. Concerning the update of PGs to take account of changing circumstances and new evidence it was agreed that where there is a member of national policy staff with clear responsibility for the topic, it should be their responsibility to update it on an annual basis with a more thorough review, involving the field, about every three years. Where there is no staff member with responsibility for the topic, this would be the responsibility of a regional group or topic group involving volunteers.

5. In deciding which policy issues should be subject to review the Board agreed to delegate this decision to PC. Clearly, account needs to be taken of our current priorities as reflected in our operational and strategic plans. In addition, it was suggested that the following criteria should be used:

- The existing 'gateway tests' – ie. the standard criteria we use to help us decide whether this is an issue we need to engage with (relevance to our core agenda; scale of impact on the countryside; are other groups better placed; opportunities to make a difference; contribution to wider organisational objectives; and opportunity costs).
- The need to revise existing policy positions which may be out of date - the following positions are at least four years old: rural services; gypsy and traveller development; hedgerows; telecommunications; hunting with hounds; minerals and quarrying; sustainable development; waste; and water.
- New policy issues that require a unified position, such as our approach to housing and the new planning framework.
- Policy areas that are likely to be controversial within CPRE and on which a unified line would be beneficial.
- Policy areas where there is fresh evidence either from internal or external debates that our stance needs to be modified.

### **Possible review topics**

6. Following the Board meeting a Circular was issued in December informing branches, districts and regional groups of the outcome of the trial review and inviting suggestions for policy topics to be reviewed this year.

7. The level of responses to the Circular has so far been disappointing. To date we have received just three submissions as follows:

*Suffolk* – suggest an ‘Energy Review – including Energy From Waste (EFW) incineration plants in the countryside, inappropriately sited pylons and land wind turbines’;

*Northants* – suggest reconsidering policy on (a) onshore windpower and (b) solar energy;

*South West* – suggest we should address affordable housing, green infrastructure and green belt, strategic housing land availability assessments, ‘best and most versatile’ agricultural land, and waste.

We will report any further suggestions that we receive at the PC meeting.

8. Deciding which policy areas to review next and defining their scope will not be easy. We will clearly not be able to take up all suggestions and the decision will be disappointing to some. But if a decision can be taken transparently and with good reason, and is communicated effectively it is hoped that branches will respect what is agreed.

9. Taking account of the submissions received so far, and the criteria set out in paragraph 5 above, staff suggest that PC should consider five policy areas for review. These are set out below with a broad assessment by staff of the potential costs and benefits of each.

#### Energy policy

10. Energy policy is a controversial policy area for CPRE. One of the implications of its contested nature is that there will always be a demand for review of our policies. While we need to remain open to reviewing our position, this should be balanced against the ability to use our staff and volunteer resources to influence the external environment, rather than focusing on internal debates. Our position on renewables – particularly onshore wind – was recently discussed at the Autumn Conference, and there was no clear evidence of a widespread desire to revisit the policy position.

11. The external policy environment in relation to solar power has and will continue to change in 2011 with the review of Feed-in Tariffs. Staff have responded to these changes by creating a set of guidelines in collaboration with members and volunteers to ensure that CPRE is able to respond effectively in the media and other public fora. There may be a case for debating and formalising this. On the other hand, there is a very substantial amount of policy change occurring in relation to energy policy over the course of the next year – see App D. This may argue against devoting resources to a policy review at this time, especially in light of the unformalised but accepted policy line which has already been developed.

12. Concerning incineration and EfW, PC last considered a field-led policy proposal in mid 2009, which it approved. Staff continue to provide limited advice to local campaigners on the energy-related issues of EfW based on this policy. There are a large number of proposed incinerators across the country, and substantial industry interest in promoting new incinerators, which are environmentally inferior to other forms of EfW technology. There is therefore a case for an update of our existing position on energy from waste. There is a risk that this would create a presumption that National Office would work on this issue when there is no basis in the Strategic Plan or national capacity to do so.

#### Green Infrastructure/Green Belt

13. We should plan for the possibility of reviewing our approach to Green Belt this year, but such a review needs to support our ability to influence the National Planning Policy Framework (see App C). This may require CPRE to identify aspects of PPG2 that are

particular priorities for retention, and could also be an opportunity to campaign for new areas of Green Belt. We will need to work on both aspects in a way that can show clear support from directly affected branches. It is considered that our current national approach is that Government Green Belt policy in PPG2 is broadly fit for purpose and this has regularly been reinforced by branches in areas covered by Green Belt as well as by the London Green Belt Council (which includes a number of CPRE branches in its membership). The main concern raised by those branches that took a close interest in our *Green Belts: a greener future* report in 2010 was to ensure that it stuck as closely as possible to PPG2. Our current approach to green infrastructure is set out in our response to the draft Planning for a Natural and Healthy Environment Planning Policy Statement. We are not aware of any widespread demand from branches for development of national PG on green infrastructure.

#### Waste and litter

14. The South East Regional Group has done some work on CPRE waste policy but it is not an area that we have looked at closely in recent years. The argument in favour of doing some work on waste policy would be that it would allow us to update our national position, which could be particularly helpful for branches dealing with incineration issues. It would also be an area in which volunteers could take a lead, given that there is no national office capacity devoted to waste policy.

15. The flip-side of this is that, as there is no national office capacity on waste now, and no particular expertise on the issue among the staff, it would be difficult for us to provide much support such a review in terms of staff input. But if there is strong demand from branches for this topic, volunteers with time and expertise, that need not be a reason not to pursue it, with a very low-level of support (e.g. reviewing and commenting) from national office staff.

16. On litter, *Stop the Drop* is drawing towards the end of its time as the flagship campaign for CPRE. We do have some key policy asks, for example in favour of a container deposit refund scheme. There may be a case for a PG on this to provide a broad framework for future branch action, but it would seem odd to be drawing together a more detailed policy platform on litter at this stage and it is not clear that there is particular demand from volunteers for this.

#### Best and Most Versatile land

17. Government policy on Best and Most Versatile (BMV) land to protect our most productive soils has not been examined for some time. Protecting productive soils has become part of the debate on food security. The Conservative election manifesto argued for a two tier classification effectively proposing the abolition of Grade IIIa land but it is not yet clear what role BMV policy will play in the new planning legislation. There is potential for conflicts between CPRE and other NGOs on protecting BMV land as while we see this as useful for preventing the development of farmland, many wildlife organisations see it as providing justification for intensive farming practices. If this were to become a policy review topic it should be possible to focus the debate on the multi-functionality of land for food production and environmental benefit.

18. The 2011 Operational Plan contains two related areas of work that could be considered for policy review. The first is the Vision for Farming which will set out CPRE's aspirations for agricultural policy in the medium term. It has not become part of the formal review process as it is focused on delivering the aspirations in our 2026 Vision for the Countryside rather than day to day policy. In any case, part of the process of developing the vision has been to examine with a group of volunteers particular farming sectors, for example the dairy sector which has coincided with the campaign against the proposed intensive indoor dairy unit at Nocton in Lincolnshire. As we are already developing the farming vision in this way it does not seem sensible to make a particular farming sector a topic for policy review, particularly as it is likely almost the same volunteers would become involved.

19. A review of CPRE policy on Genetically Modified crops could be a subject for review. Due to staff constraints CPRE has only kept a watching brief on GM issues in recent years. Our existing policy is to take a science-led approach to GM crops, which has meant we would not object to the commercial growing of a GM crop if trials prove it has no detrimental effect on the environment. This approach is tempered by a recognition that the public have a right to choose not to eat GM crops and that this means cross contamination of non GM crops (whether conventional or organic) needs to be avoided. This can be a particular issue for local foods.

20. The new Government has indicated it may take a more supportive approach to growing GM crops but has yet to make a definitive policy statement. At an EU level moves are underway to devolve decisions on GMOs to each member state. While GM crops are an important issue and increasingly cited as the answer to food security problems, this has so far not been a core area of work for CPRE and it is debatable what value would be added by devoting staff and volunteer time to developing new PG.

#### Affordable Housing/Strategic Housing Land Availability Assessments

21. Affordable housing, and in particular rural affordable housing, is an issue that exercises many CPRE branches. Our established policy of supporting small scale rural affordable housing development in rural areas, on the condition that this housing is to be affordable in perpetuity and occupation limited to those with strong local connections, is generally supported. This policy has been explored most recently in the CPRE publication in *Housing the Nation*, published in November 2004, and our subsequent engagement with the Affordable Rural Housing Commission and work with the National Housing Federation.

22. The detail of how our affordable rural housing policy could be implemented is admittedly less clear. There is now a wider discussion on innovative ways for delivering affordable housing at a time of vastly reduced public subsidy. Questions have also been raised with national office staff about the robustness of the evidence being used to justify affordable housing developments. These issues do not appear, however, to concern matters of principle and would benefit from further research, rather than a review of our existing policy position.

23. Strategic Housing Land Availability Assessments (SHLAAs) are one of a number of mechanisms that determine how housing demand and need are met in England. This is a narrow topic that would benefit from being addressed alongside wider national policies on land allocation for housing, for example windfall sites, the sequential approach and density. As with affordable housing, our national position on land allocation for housing is well established, and supported by branches and district groups.

24. National and local planning policy is currently in a state of flux. For example, it is not yet known how neighbourhood planning will impact on SLHAAs and the review of national policy on planning for housing is likely to result in significant changes. If a review of our policy on land allocation for housing is to be carried out therefore, such an exercise is likely to be most beneficial if done once the outcomes of current planning reforms are clearer.

#### **Conclusion**

25. PC is invited to consider proposals for policy reviews in 2011 and to decide which two policy areas should be taken forward.

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