

How Green is my Region?



England for ever

England's nine regions - the least known tier of UK devolved government - have seen great efforts by decision and policy makers to get to grips with the environmental challenge. This is well documented in science, increasingly reflected in rhetoric and now in need of true leadership to apply effective policies to make England environmentally sustainable.

Regional Assemblies (RAs) and Development Agencies (RDAs) have significant influence - through their duties, powers and funds - over England's ability to become an environmentally sustainable nation. After years of tracking the RAs and RDAs three of England's leading environment organisations asked: *What difference is RA and RDA policy and practice making and what is needed now to meet the imperative of living within environmental limits?*

Here we sum up our findings and recommendations from an original research report, *Environmental Sustainability and English Regional Strategies*.

For details see:

www.cpre.org.uk/home

www.foe.co.uk/england

www.wwf.org.uk/core/index.asp



When England's regional assemblies and economic development agencies emerged three of the leading environment organisations started tracking their respective statutory spatial and economic strategies.

Now we take stock of progress by the RAs - and to some extent by the RDAs - to see if their strategies and policies are moving England toward or away from environmental sustainability - the fundamental pre-condition for economic and social progress. This report summarises our findings and recommendations.

Researching England's regions

We asked Levett-Therivel sustainability consultants to conduct first time research into each region's spatial and economic development strategies (RSS and RES) and the use and quality of the combined Sustainability Appraisal and Strategic Environmental Assessment process (SA/SEAs) as at December 2006.¹ They confidentially interviewed RA/RDA staff and SA/SEA consultants. Our snapshot of progress and potential shows that:

- **Regions, the right place:** progress in some regions supports the potential role of the regions as a logical and valuable yet currently under-resourced and under-performing level to coordinate policy and deliver environmental sustainability.
- **We're in this together:** some regions with more advanced policies are better placed than others to make progress on environmental sustainability although sustainability in one region depends on sustainability in all regions.
- **Mind the gap:** good individual policies do not add up to sustainability and none of England's nine regions is yet close to meeting the environmental sustainability challenge.
- **Do not pass Go:** effort in all regions is hindered by habitual pursuit of 'business as usual' policy and practice often to satisfy UK Government pressure to adopt or continue environmentally unsustainable activity.
- **End to special pleading:** the universal and urgent need for environmental sustainability means that regions should resist the sidelining of environmental sustainability concerns for other 'more important' issues.
- **Workmen blaming their tools:** when used by qualified practitioners in a planned not random way Sustainability Appraisal can be a useful tool to inform and improve decision making and to ensure that the spending of public funds supports policy making designed to deliver sustainability.
- **Economical with our environment:** The RDAs require more inquiry to check that their approach to environmental sustainability is more than having some 'green' initiatives while continuing unsustainable economic activity overall.

¹ Regional planning is an ever-changing arena and we are aware that the RSSs and RESs for most regions have been updated or amended in some way since December 2006. This research and report are intended as a snapshot at the time towards the end of the first round of RSS development. Follow up work to reassess the situation and evaluate the impact of the Examinations in Public process is planned.

The value of regional delivery

England's regions provide a key vehicle for delivery of environmental sustainability on paper and on the ground where it matters most, where it can be seen and can help change behaviour.

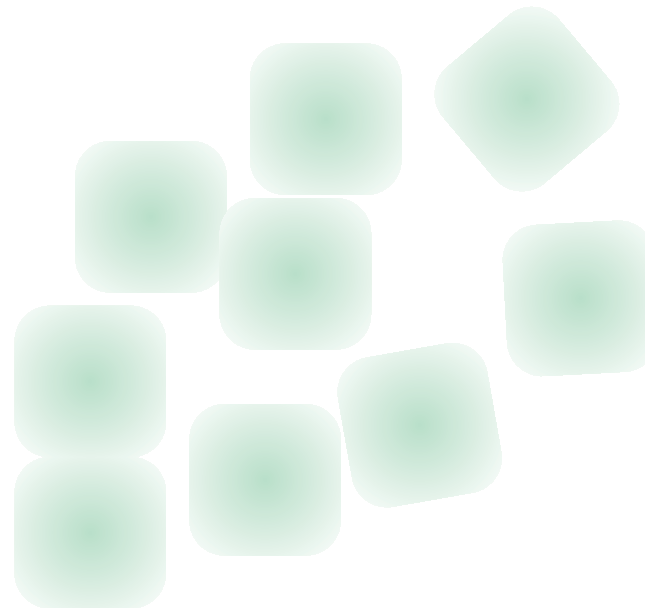
Regional Assemblies – regional government has a vital role in visibly leading delivery of environmental sustainability. Assemblies can take the strategic overview of how local delivery takes place and make sure the sights of local policy makers are raised and fears that action will lead to loss of economic advantage ceases to be the default position. Operating under difficult circumstances to date Assemblies should be properly resourced and given stronger democratic legitimacy, possibly through direct election.

Regional Development Agencies – the RDAs have a curious duty to contribute to sustainable development only 'where applicable'. This implies that there are sustainability 'no-go' zones, which may reflect the view in parts of Government. From our initial analysis there are questions for RDAs and Whitehall about how well the RDAs are delivering this limited duty and whether they are simply greening a few policies as a lightweight counter to their prime duties to boost economic growth and jobs often in ways which undermine environmental sustainability.

Government Offices - As the face of Whitehall in each region the GOs should ensure that they help rather than hinder regions in delivering environmental sustainability. The GOs have much to do because their role is to implement central Government decisions in each region and overcome the perception of one interviewee that "the dead hand of national government creeps in all the time..." preventing progressive action rather than helping or freeing up the regions to take the UK's 2005 Sustainable Development Strategy seriously.

Sub regional policy - Our research found that even the more progressive RSSs are easily undone by 'horse-trading' at sub regional level where local authorities stick to well trodden unsustainable paths. Trading to build support for pet projects which entrench current unsustainable trends for road traffic, for instance, is common.

Public agencies - statutory agencies such as Natural England and the Environment Agency operate at the regional level. They play a key role in providing information to the RAs and RDAs on environmental assets, trends and characteristics of a region. They also provide expert advice on issues such as flood risk and prevention, protected landscapes and habitats, climate change mitigation and adaptation and use of SA/SEA. They are, however, under-resourced if they are expected to meet in full demands placed upon them by regional bodies and planning processes and still deliver their other statutory obligations. They have a crucial role to play in providing background data for and scrutinising the SA/SEA process.



Paved with good intentions

*The best regional strategies “enact and promote national pro-sustainability policies enthusiastically and resourcefully at regional level.”
Levett-Therivel page 2*

Since taking on their roles some committed and imaginative regional decision makers and officials have improved their region's chance of making environmental sustainability a reality instead of always being a distant aspiration.

Our research finds that current good individual policies and practice does not yet add up to enough progress being made to allow any one region to claim to be at the cutting edge of environmental sustainability. No RSS, if delivered, would make its region fully environmental sustainable and inclusion of good policies does not mean that a region is environmentally sustainable. Despite many policies and sentiments which individually look environmentally sustainable Levett-Therivel found that “overall none of the RSSs comes close to ensuring that development is environmentally sustainable”.

Looking at Regional Economic Strategies (RESs) we find the RDAs starting to pay attention to environmental sustainability though mainly as an ‘add on’. This is reflected in RDAs’ liberal use - over 1,000 times - of the word ‘sustainable’ in their strategies which remain dedicated to and dominated by unsustainable policies and projects. The word ‘sustainable’ is often added to clearly environmentally unsustainable activities, for example “sustainable airport expansion in the region” (East of England RES).

From research and interviews with RDA staff Levett-Therivel report that RESs “show similar problems to those already identified for RSSs: nascent positive response to environmental sustainability is hamstrung by requirements for consistency with national policies which are themselves inconsistent with each other and with sustainability” (page 56) and that “environmental good intentions are too often negated by policies to promote increases in unsustainable activities notably air and road travel.” (page 2)

It's the stupid economy

*“...there are some tough constraints on regional planners’ ability to write fully environmentally sustainable RSSs, including national government policy and the perceived imperative of economic growth.”
Levett-Therivel page 21*

In regions with good intentions and efforts to date we found these being dragged down by the UK Government's insistence on an approach to economic development as the cure-all for society's needs even when this adds to societal ills by undermining progressive social, economic and environmental policies.

The Government's pursuit of this ‘economic drag’ leads to regions having no choice other than to persist with environmentally irresponsible economic activity such as aviation and transport growth. Some regional bodies readily go along with the Government's economic drag and add to this by giving prominence in their policies to a particular model of economic growth over social, environmental and other economic considerations. For some regional players it is what they have always done and is the only way they know; for all regions it is a way to secure funding for pet projects, such as road schemes, which entrench unsustainable practice.

There are signs that some regions are keen to escape this undermining effect and are starting to recognise how the pursuit of narrow economic growth above other considerations is undermining sustainable development and making its reality harder to achieve.

“Some authorities are pushing the boundaries of RSS remits, for instance by including policies on ecological footprints, although the Secretary of State’s attitude to such policies is not yet clear.” Levett-Therivel page 21

Piling on the pressure

“...strategies are having a significant combined, cumulative negative impact on some environmental resources: the negative impacts of one RSS are not being cancelled out by positive impacts of other RSSs.” Levett-Therivel page 21

Each RSS and RES is developed with some reference to neighbouring regions. Currently this is of limited value as there is no overall consideration of the combined effect of all strategies. Looking at one region’s RSS or RES does not convey whether that region is adding to unsustainable trends across England or aiding the essential need to live within environmental limits in order to sustain life and build social equity and economic well being.

Our research included an initial but by no means thorough study of the combined effect of regional policies. For example, if each region pursues damaging air and road travel growth what does this mean for resource use, biodiversity loss and climate change emissions across the entire country? None of the RSSs and their Sustainability Appraisals appears to look at the cumulative effect of a region’s policy on top of other region’s unsustainable policies. We are not aware of any action by central Government to address this either. This deficiency should be addressed as soon as possible.

Paper exercises

“the SA/SEA process does not ensure that regional-level strategies are environmentally sustainable.” Levett-Therivel page 46

We also looked at Sustainability Appraisals and Strategic Environmental Assessment (SA/SEAs) and the role of consultants in the strategy and policy making process. There is no shortage of eager consultants, including some well established practices, to help regional bodies carry out SA/SEAs.

This field is likely to grow in number and importance as European and other requirements such as Water Framework and Habitats Directives and Strategic Flood Risk assessment start to bite.

In this new crowded consultancy field where conducting an SA/SEA is neither art nor science we found that despite the array of advice regions’ RSSs would still have mostly negative impacts (Levett-Therivel report, table 2.2, pages 18-19).

SA/SEA and other processes are supposed to support the development of environmentally sustainable strategies although it is important to note that the focus of SA/SEA is on the words on paper not on whether those paper policies will be delivered. Ultimately this is about political decision making because strategy and policy formation is informed and not directed by SA/SEAs.

Even so we found wide variation in the quality of SA/SEAs and the advice provided to regional bodies. Consistently higher standards in the consultancy offer would ensure better use of public money and help steer sustainability on the ground. Also, to be more than a box-ticking paper exercise, SA/SEA must take place earlier in the policy forming process and regional bodies should be required to spell out how they have addressed issues identified by SA/SEA especially where action to avoid unsustainable actions and trends has not been adopted.

Leadership to meet the sustainability challenge

“Putting the word ‘sustainable’ in front of the phrase ‘expansion of airports’ seems to be expected to make it so.” Levett-Therivel page 52

In an era of apparently endless choice England’s regions are still heading away from sustainability because they are being forced to make the choice to continue with clearly unsustainable policies based on damaging forms of economic growth.

“There is...no intrinsic or necessary inconsistency between ‘living within environmental limits’ and ‘improving the quality of life’.”
Levett Therivel page 11

By narrowly pursuing economic growth and allowing this to dominate all other considerations, England’s regions are entrenching unsustainable trends, detracting from and undermining positive environmental action.

Our research confirms that in most of England’s regions superficial sustainability conceals the reality that regions are taking (or being required to take or being complicit in taking) their policy, practice and people away from the direction required to improve well being, quality of life and environmental sustainability.

Ultimately the purpose of policy making and efforts to get the right policies on paper is to affect what happens on the ground. Without that translation from paper to practice people in all regions cannot see and take their cue from sustainability leadership by elected representatives and officials.

Leadership for sustainable development is more than thinking up a few green initiatives or justifying existing damaging policies by using the word ‘sustainable’. Without it England’s nine regions will be trapped in the sustainable development ‘slow lane’ and out of step both with scientific evidence on the need for rapid action and with peoples’ growing appetite for environmental solutions, social justice and economic stability pursued together not separately – true sustainability in action.

Recommendations

Regions need to be freed up to replace damage on the ground with sustainable practice for all to see and benefit from. The false choices detailed by this report and our research must be avoided.

This would require sustainable development rather than being marginalised to be the prime purpose of regional bodies and their strategies which would bring them in line with the overarching aim of Government planning policies. It would also require the UK’s 2005 Sustainable Development Strategy (SDS) to be lifted from the sidelines and made pre-eminent among Whitehall strategies.

The Government says that its SDS is owned by the whole of Government and is being acted on across all Whitehall departments. Based on our research, choices need to be made about whether sustainable development will be taken seriously or used merely to justify more of the same policies which have caused the environment crisis.

We suggest four main strands of action to address the issues preventing delivery of more environmentally sustainable regional plans and activities:

Planning White Paper

Government should use the opportunity presented by its Planning White Paper consultation to set out a clear framework of policy priorities, with climate change at the top, and to start addressing the policy conflicts highlighted in the Levett-Therivel report.

The Government should also devolve real powers to the Regional Assemblies showing its support for the role of regional planning. These powers should include the ability to derogate from national policy where implementation of national policy in the region would be environmentally unsustainable and to deliver regional policy where this would be the appropriate level for action.

Comprehensive Spending Review

The current Spending Review should allocate the resources necessary for:

- Regional Assemblies to deliver improved policies and to deal fully with sub-regional issues and ‘horse trading’ at local and sub-regional levels.
- Local Authorities, statutory agencies and other organisations to engage fully with sub-regional planning, SA/SEA processes, provision of regional monitoring data and engagement with regional planning processes such as Examinations in Public (EiPs).

The Regional Coordination Unit should be given and fulfil a remit to:

- Establish and maintain cross-departmental working within Government and liaison within the regions.
- Assess cumulative impacts of regional strategies and suggest or implement measures to avoid negative cumulative impacts and enhance positive ones.
- Ensure interregional consistency and address the issue of damaging competition between regions.

Planning Policy Statement 11 (PPS11)

In addition to changes made through the Planning White Paper process, a review of PPS11 should give:

- A clear hierarchy of priorities (with climate change at the top) to provide better guidance for regional planners trying to reconcile conflicting national policies.
- Clear guidance of how and when regional plans can derogate from national policy in order to pursue sustainable policies.

- Support for the importance and value of the role of regional planners.
- Clarification of the role of consultants in the SA/SEA and EiP processes.

Strategic Environmental Assessment

A review and update of the guidance on SA/SEA to address the issues raised by our research. Independent scrutiny of SA/SEAs by either the Sustainable Development Commission or jointly by the Environmental Agency and Natural England is also needed, as is a requirement for bodies to justify ignoring major recommendations of SA/SEA reports. A review of SA/SEA practice should investigate how the lack of ‘bite’ of the SEA legislation could be addressed.

All of the actions above should be accompanied by greater Government scrutiny of the activities of the regional bodies (RAs, RDAs and GOs). The Regional Coordination Unit should monitor progress and highlight areas for further improvement.

Action in the Regions

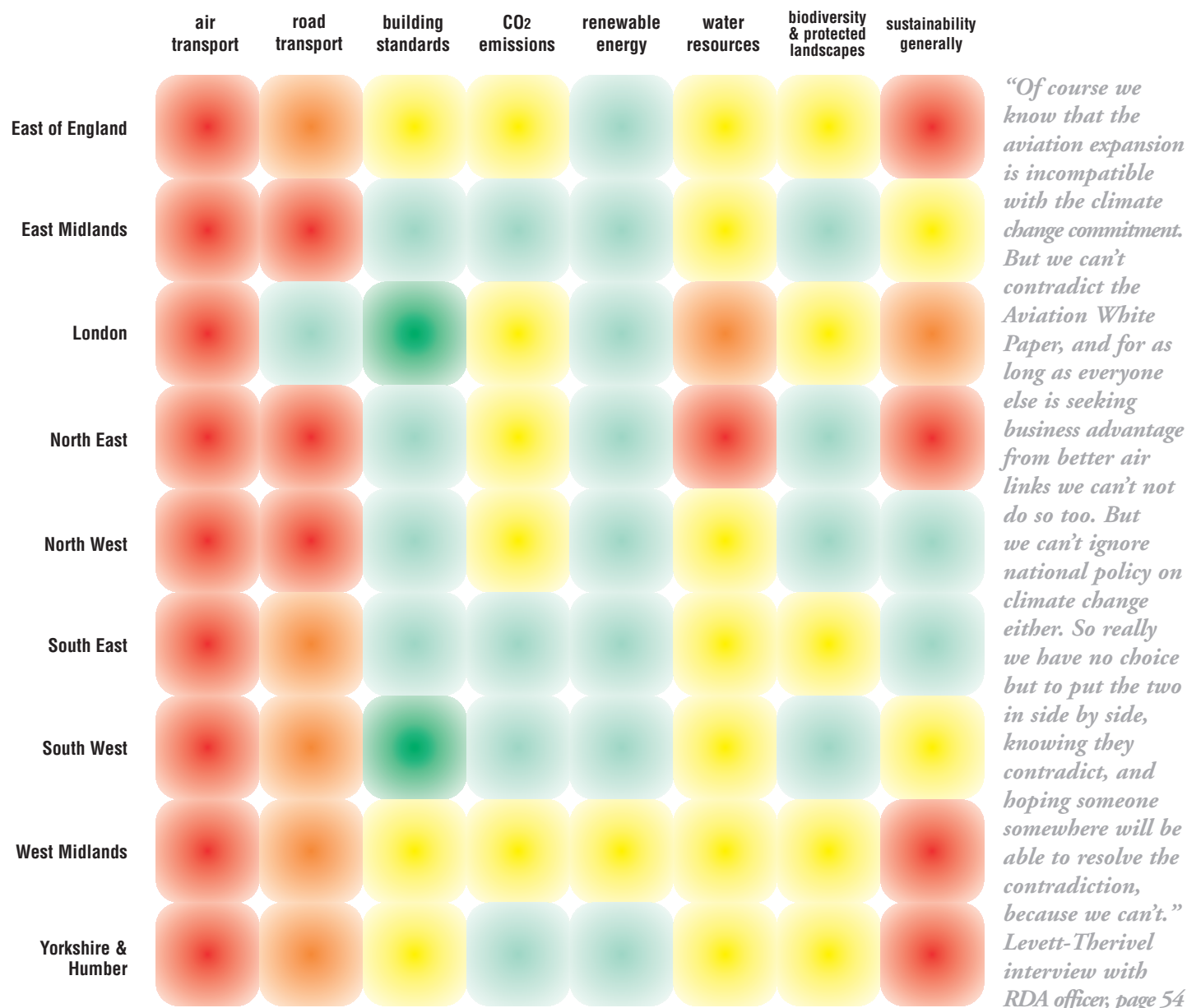
Regional Assemblies and RDAs should share learning and adopt best practice on environmental policy and practice - clearly some regions are more pro-active than others at pushing the boundaries.

RAs and RDAs should use their lobbying powers to challenge the Government to address policy conflicts and devolve real powers to the regions to deliver environmental sustainability.

RAs should focus more on the development of sub regional strategies to ensure that their content is fully integrated and consistent with RSS sustainability policy.

RAs and RDAs should subject the SAs of their strategies to an independent review to ensure their rigour and independence.

Ranking the regions



Ranking RSS sustainability by key environmental limits

Based on our key environmental limits some regions’ strategies are making more progress than others in some areas though none of the regions can claim that their policies and practices are fully environmentally sustainable.

KEY

Aims for true environmental sustainability targets/limits and puts in place adequate measures to deliver them

Note: no region achieved this score for any policy

Aims for true environmental sustainability targets but delivery measures are limited

Aims for improvement over current levels or stronger measures than national standards; and puts in place adequate measures to deliver them

Aims for improvements over current levels but delivery measures are limited or contradictory policies whose impacts are likely to roughly cancel each other out

Accepts that things will get worse but makes valiant attempt to reduce the degree to which they do or contradictory policies whose total impacts are likely to be somewhat negative

Accepts that things will get worse and makes little or no attempt to improve environmental sustainability