

Report to Sustainability East and partners:

Embedding sustainable development in the East of England

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Levett–Therivel Sustainability Consultants
With Global to Local Ltd

Contact: Roger Levett, 39 Cornwallis Crescent Bristol BS8 4PH
Tel/fax/ansa 0117 973 2418 roger@levett-therivel.fsnet.co.uk

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Summary

This document presents proposals for embedding sustainable development in the new governance arrangements in the East of England. The proposals were commissioned by Sustainability East, drafted by the consultants, and refined in discussions with the project steering group, an expert workshop and discussions with representatives of key regional and national organisations.

The main recommendations are as follows:

Sustainable development objectives for the Regional strategy (chapter 2)

The new regional strategy (RS) should be driven by the sustainable development objectives in the Government's own definition of 'sustainable economic growth, and the region's Integrated Sustainability Framework, and have implementation mechanisms and powers to deliver them. Specifically:

- To keep development 'within environmental limits', the RS should require development to avoid and minimise greenhouse gas emissions, water consumption, waste water loading, waste generation or traffic, and to pay, via a regional offset fund, for measures within the region to neutralise any remaining unavoidable damage;
- To ensure that development 'enhances the environment', local authorities should be able to set high standards of design and (through planning agreements or the community infrastructure fund) to secure developer contributions for environmental improvements beyond just offsetting negative impacts;
- To 'enhance social welfare', economic development should aim to provide secure employment, have high local multipliers, reduce income inequalities, meet local needs, offer a better work-life balance, support healthy lifestyles and support non-traded sectors;
- To 'avoid greater extremes in future economic cycles', economic development should support primary production, particularly of low carbon goods and services, manufacturing, and more emphasis on meeting local needs;
- Public investments in infrastructure and services should be driven by RS objectives.

The process of developing the new single regional strategy (RS) (Chapter 3)

The process should consist of

- An open public debate about social, economic and environmental goals and priorities, including the *kinds* of economic development wanted, and not only the rates of growth;
- Reasoned choice of ways to achieve these from a wide range of options;
- Detailed working up of packages of development policies, public service delivery commitments and infrastructure investments to achieve the preferred options by broad based topic working groups;
- Consultation, modification;
- Examination in public as an active, iterative process, influencing development of the strategy
- Sign-off by an appropriately representative regional body, with subsequent changes by Government only in exceptional circumstances
- Flexibility for the region to take on board new policies, changes in focus, or opportunities subsequently created, which would support regional sustainable development aims.

New regional governance structures for the East of England post-SNR (Chapter 4)

Stakeholders representing sustainable development interests should have an established involvement in making important regional strategic and policy decisions, not only an advisory input. In particular, the body which signs off the RS should include representation of economic, environmental and social aspects of sustainable development.

Effective representation for non-Governmental stakeholders (Chapter 5)

Social and environmental umbrella groups should have representation on executive and decision taking bodies.

Effective and independent challenge on SD (including appraisal and scrutiny) (Chapter 6)

Sustainability appraisal of RSs should:

- Be integrated, including health and equalities assessment;
- Test resilience under a range of possible future scenarios, especially climate scenarios (including their implications for food and energy security and trade);
- Prioritise informal, co-operative engagement with the strategy authors, starting early in strategy development,
- Concentrate on major (significant) issues;
- Test against sustainability outcomes;
- clearly distinguish 'less bad' from 'good', and 'good' from 'good enough';
- Be iterative, informing the proposed iterative Examination in Public process;
- Revisit outstanding recommendations from the SAs of 'ancestor' strategies;
- Consider whether policies are likely to be implemented and effective, not only their stated intentions;
- Give plan authors a stronger obligation to give serious consideration to major recommendations;
- Have strong safeguards of independence.

Expertise on SD within the region (Chapter 7)

There should be an independent sustainability champion body for the East of England which should:

- not be a part of any other institution;
- have membership mostly nominated by the sustainable development policy community (including statutory and third sector environmental and social NGOs) though acting in a personal capacity not as representatives of organisations;
- have core public funding, committed on a rolling 3 year basis, sufficient to maintain high calibre permanent staff and research capability;
- have responsibility (and resources) to commission, project manage, quality-assure and publish sustainability appraisals of regional strategies and programmes;
- be represented on significant regional decision making bodies, including full (voting) participation in Regional Strategy preparation working groups;
- be given the opportunities to provide input to the formulation of central government policies and consultations, and their application to the East of England.

1 Introduction

Sustainability East with its regional partners retained Levett-Therivel Sustainability Consultants with Global to Local to advise on how sustainable development could be embedded in the new institutional landscape in the East of England being created by the Sub National Review of Economic Development.

These proposals have been developed through consultation with the project Steering Group, at a workshop for invited participants in March 2009, and in discussions with key regional stakeholder organisations..

1.1 National policy background

The Government started consultation on its Sub National review proposals in 2007. Sustainability East commented in detail on sustainable development issues¹, as did the Sustainable Development Commission nationally². Government set out its decisions in *Prosperous Places: taking forward the review of sub-national economic development and regeneration: The Government response to public consultation 25 November 2008*.³ This differed substantially from the original proposals on various key points, and is generally much better for sustainable development.

The decisions in this document have since been embodied in the Local Democracy, Economic Development and Construction Bill⁴, and amplified and explained in a policy document on regional strategies, CLG, January 2009⁵. (These five referenced documents are all very useful context for this paper.)

The Government documents emphasise discretion for regions to make their own decisions and arrangements to implement the overall principles the Government has set out. This discussion paper responds with proposals designed to build on existing arrangements and previous successes in the East of England.

1.2 Regional context

The East of England has already made important progress towards integrated and sustainable regional strategy:

- The latest Regional Economic Strategy⁶ and Regional Spatial Strategy⁷ both promote integrated social, economic and environmental objectives;

¹ <http://www.sustainabilityeast.org.uk/pdf/Prosperous-Places-consultation-response-FINAL.pdf>

² Most recently, and relevant to this paper, in Embedding Sustainable Development in the Regional Strategy Development and Delivery Processes, November 2008
<http://www.sustainabilityeast.org.uk/pdf/SustE%20policy%20Paper%20Sept%202008.pdf>

<http://www.communities.gov.uk/publications/citiesandregions/govresponseprosperousplaces>

⁴ <http://services.parliament.uk/bills/2008-09/localdemocracyeconomicdevelopmentandconstruction.html>

⁵ <http://www.communities.gov.uk/publications/citiesandregions/ldedcregionalstrategies>

⁶ Inventing our future: collective action for a sustainable economy: Regional Economic Strategy for the East of England 2008-2031 <http://www.eeda.org.uk/1530.asp>

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- The East of England Implementation Plan for the RES and RSS which is out for consultation;⁸
- The Integrated Sustainability Framework for the region⁹ identifies sustainable development objectives, how far they are addressed by the RSS and RES and proposals for the RS;
- Negotiations are advanced for development of a regional strategic board to oversee strategy in future;
- Sustainability East, the regional champion body, has made a range of contributions to developing sustainable regional strategies.

These are discussed in more detail in the appropriate sections below.

Other regions are formulating their own ways to implement the SNR. This work will draw lessons from their experience, and from a parallel study of embedding sustainability in the Greater Norwich Economic Strategy.

1.3 This paper

This paper has a chapter each on six big issues:

2. Sustainable development objectives for the RS (and indicators and targets used to monitor them)
3. The process of developing the new Regional Strategy (SRS)
4. New regional governance structures for the East of England post-SNR
5. Effective representation for community stakeholders
6. Effective and independent challenge on sustainable development (including appraisal and scrutiny)
7. Expertise on sustainable development within the region.

These are of course interrelated: this division was agreed with the Steering Group for clarity.

Each of these chapters has the following six sections:

- 1 The post SNR starting point: that is, the decisions already taken by Government about how the SNR will be implemented;
- 2 Principles and objectives which we suggest the new arrangements should meet for sustainable development reasons;
- 3 Regional context;
- 4 Practical proposals for institutions, procedures, mechanisms to achieve these objectives in the SNR;
- 5 Reasons we are advancing these practical proposals
- 6 Potential risks and downsides of the proposals, and ways to address them

In each chapter we have kept sections 1 – 4 brief to provide a quick overview of the proposals, with more detailed explanations in section 5.

Annexes give some more detailed background:

⁷ The East of England Plan May 2008

http://www.gos.gov.uk/goeast/planning/regional_planning/?a=42496

⁸ http://www.eeda.org.uk/files/finalJIPbriefingdocument29_10_08.pdf

⁹ <http://www.eera.gov.uk/What-we-do/developing-regional-strategies/integrated-sustainability-framework/>

- 1: Some extracts from our proposal which open up some important issues
- 2: Detailed discussion of environmental limits
- 3: Life satisfaction
- 4: The proposed Parliamentary regional committees
- 5: The 18 March workshop

The paper does not attempt to set out an exhaustive blueprint, but instead to concentrate on the most important points for sustainable development.

1.4 Acronyms and abbreviations

‘The Government Response’ = Prosperous Places: taking forward the review of sub-national economic development and regeneration: The Government response to public consultation 25 November 2008.

‘The Leaders Board’ = Local authority leaders’ board

‘The Policy Document’ = Local Democracy, Economic Development and Construction Bill: Policy Document on Regional Strategies, CLG, January 2009

RA Regional Assembly

RDA Regional Development Agency

RS Regional Strategy

SEEPs Social, Environment and Economic Partners (= community stakeholders)

2 Sustainable development objectives for the RS

2.1 SNR starting point

The Bill tasks RSs with promoting ‘sustainable economic growth’. Policy Document defines this as ‘economic growth that can be sustained and is within environmental limits, but also enhances the environment and social welfare, and avoids greater extremes in future economic cycles.’ As the SDC has commented, this is a highly condensed, complex and multiple definition in need of clarification.

Policy Document identifies ‘3 areas where Government will set clear expectations [for RSs]:

- Economic outcomes: where Government will expect growth in all regions. This is already crystallised by the Regional Economic Performance PSA.
- Housing outcomes: where Government will expect regions to test the range of housing supply figures derived from the National Housing and Planning Advisory Unit recommendations. The NHPAU figures have already been produced.
- Climate change: where Government will expect an ambitious strategy which secures enduring progress against the UK’s greenhouse gas emissions targets and budgets and makes a full contribution to national energy policies’.

2.2 Principles and objectives we suggest the new arrangements should meet

Sustainable development objectives should drive the RS.

Sustainable development has social economic and environmental aspects. The RS should promote all these together, not some at the expense of others.

In line with the definition already quoted, the RS should seek to ensure that the region’s development trajectory:

- Is within environmental limits (including greenhouse gas targets)
- Enhances the environment
- Enhances social welfare
- Is sustainable in the sense of being able to be maintained into the future
- Avoids greater extremes in future economic cycles.

Economic growth should be promoted, and measured, in forms that promote these objectives.

2.3 Regional context

The East of England has already taken major steps towards an integrated approach to sustainability in regional strategies:

- The RES’s vision includes social and environmental aspirations as well as economic. GVA growth is one of six ‘overarching ambitions’; the others are raising employment and skills, reducing income inequality, and explicit quantified targets for reducing greenhouse gas emissions and per capita water consumption. The RES seeks to develop the region’s economy in ways that meet multiple goals;
- The RSS’s vision likewise includes economic, social and environmental aims: realising economic potential, providing a high quality of life (including housing sustainable inclusive communities, reducing energy and water use and strengthening environmental assets;

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- An East of England Implementation Plan (EEIP) consultation document has been produced, which ‘will align the targets and objectives of the RES and RSS and set out the critical interventions needed to meet these up to 2021 and beyond. With a focus on regionally significant interventions, it will include both infrastructure projects and broader programmes of activity’;
- Sustainable Futures, the Integrated Sustainability Framework for the region (launched in 2009) sets out sustainable development objectives agreed by EERA, EEDA, Sustainability East and the Environment Agency as a foundation for the RS;
- An extensive evidence base for the RES has been produced, including modelling of economic scenarios and their implications for energy and other environmental resources;
- An initial Climate Change Action Plan has provided evidence to inform the EEIP, and will be developed during 2009 to focus on delivery.

2.4 Practical proposals

The RS’s top level objectives should be that

- economic development is focused on raising quality of life and wellbeing
- human impacts are kept within environmental limits (or are getting closer if currently outside them)
- the environment is improving;
- the regional economy is increasing its resilience and robustness into the future and reducing social inequalities.

The RS should include policies and decision rules (including setting requirements for local development documents and other lower level plans) to secure development that enhances and does not undermine these. These should include:

- Aims that developments should not be permitted that increase carbon emissions, water consumption, traffic or unrecovered waste (including construction waste), including consequences outside the region;
- Policies to promote economic activity responsive to the needs and aspirations of the region’s population;
- Continuation and strengthening of the RSS’s spatial policies for sustainable settlements offering a good quality of life with low resource demands;

To be effective and meaningful, these policies and decision rules must be backed up with implementation mechanisms capable of ensuring they are delivered. These should include

- Infrastructure investment decisions driven by RS objectives;
- Powers to set requirements tougher than national standards for energy and resource performance of development;
- A regional offset fund, to invest in measures to compensate for any unpreventable adverse impacts on environmental resources near or beyond acceptable limits including greenhouse gas emissions, water consumption, waste water, and motor traffic, also adverse impacts on social wellbeing eg loss of access to greenspace or local amenities. Offsets could include, for example, paying for retrofitting conservation measures in buildings which are technically robust but not cost effective without the offset payments, or subsidising local service delivery);
- A requirement for all development which adds to such impacts to pay enough into the offset fund to neutralise them;

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- Policies for charging selected developments more, to achieve net enhancement of environment and social wellbeing;
- Powers for local authorities to secure funding for sustainability offsets, for example through wellbeing powers, Section 106 agreements and the Community Infrastructure Levy
- Support for training and education for the influencers and implementers, to ensure robust decision making.

In support of these, the RS should include indicators and targets for:

- Economic development framed in terms of contribution to human wellbeing rather than quantity of traded activity. Wellbeing based measures of economic progress require more work, and not only for this region. Until better measures are available, a regional Index of Sustainable Welfare (R-ISEW) or similar measure should be used as the headline measure of economic progress in place of GVA;
- Local economic multipliers, ie amount of economic benefit put back in to local economies (eg by local employment, sourcing of goods and services);
- Economic development which supports and enhances low carbon activities;
- Outcome measures for housing, for example the affordability of suitable housing for different social groups, not only input measures such as house building rates;
- Reductions in greenhouse gas emissions, energy and water consumption, following up those already in the RES;
- The quality as well as quantity of environmental assets;
- The environmental intensity of living patterns: for example the amount of car mileage a household needs to access day to day services and amenities;

These could be developed from ongoing initiatives and programmes in the region, for example the work of the Regional Water Partnership and the Regional Waste Partnership, and Resource Efficiency East.

The existing evidence base for the regional strategy should be developed with particular emphasis on:

- The effects on the life satisfaction and wellbeing of different social groups of economic activity and its distribution;
- Environmental constraints and limits, and packages of policies and interventions needed to reconcile economic development with them.

2.5 Reasons for these proposals

If RSs are to promote ‘sustainable economic growth’ as defined in the Policy Document (quoted above), each part of the definition will need to be made operational so that policies and actions implementing the RS can be tested for compliance with them.

This section outlines how this could be done.

‘is within environmental limits’

The idea behind this principle is simple and obviously sensible: there are limits to how fast the environment can provide raw materials and mop up wastes, and human activities should not run down the environment’s capacity to support human life in future by exceeding these limits. However, actually applying this apparently straightforward idea to practical policy has turned

out to be surprisingly difficult because environmental limits can not simply be ‘read off’ from nature and applied as a simple technical process. Instead, applying the concept always involves judgements and value based policy choices. This is discussed in detail in Annex 2. This concludes that a *minimum* test of whether the RS is consistent with the principle of ‘living within environmental limits’ should be that where some resource demand or pressure on the environment is generally agreed to be close to, or beyond, an acceptable limit, the RS will not allow decisions that would make the position overall any worse. This addresses the point that it is the total amount of impact that matters and should be addressed by policy. It is not enough to improve the efficiency of resource use per capita or per unit of economic output (common preoccupations of policies and performance measures) if growth of population or economic output will swamp the savings. This distinction is particularly important for a region committed to high growth.

Impacts should be attributed to the activities, and actors, which cause them. For example, the energy used in making goods imported into the East of England should be counted as part of the East of England’s ‘footprint’: we should not be able to put our impacts ‘off balance sheet’ by replacing our own manufacturing by imports.

Pending more detailed study, a provisional list of such resources and pressures should include:

- Greenhouse gas emissions
- Energy consumption;
- Fresh water;
- Waste water assimilation;
- Land bio-productivity,
- Solid waste needing disposal,
- Road traffic.

Offsetting

It is often impractical or prohibitively expensive to achieve zero impact on these environmental resources within individual developments, so the principal of no net increase in impact requires developers to be allowed to offset these off site.

However the offsets need to be real. There are growing concerns about the reliability, additionality and side effects of commercially traded offsets. As a result some local authorities such as Eastleigh and Milton Keynes are setting up their own schemes under which developments or activities which increase carbon emissions can pay for projects within the area (for example subsidies to householders outside the scope of Government grants to retrofit energy efficiency measures.) The UK Green Building Council has proposed that developers should be allowed to pay into a ‘community energy fund’ to bridge the gap between what can be achieved with cost effective on-site measures and full carbon neutrality, and The London Olympics are considering whether to set up a similar fund. This has enormous potential in principle to solve two problems together: the diminishing returns on the highest levels of sustainability performance in new development, and the need to finance retrofit in existing buildings.

The principle should be extended to other forms of environmental consumption and damage: for example developments that create additional water demand or car traffic paying into a fund to subsidise water efficiency retrofit or public transport to achieve equivalent reductions elsewhere in the area. (The area within which an offset is valid will vary between different kinds of impact.)

It should also be extended to negative impacts on social welfare: development which undermines the objectives listed under ‘enhances social welfare’ and ‘can be sustained ...’ below should pay for offsetting initiatives which restore the damage.

‘enhances the environment’

The approaches discussed under environmental limits, of requiring development to minimise adverse environmental effects and offset remaining ones, should ensure that important aspect of the environment do not get any worse. Continuation of the spatial and environmental policies of the current east of England Plan would minimise the environmental impacts of growth. However avoiding or minimising further damage is not the same thing as positive enhancement. Enhancement would require positive action to reduce the negative environmental impacts of existing development and activities. This would require policies and investments to (for example)

- Reduce the energy, water and waste water demands of existing buildings over and above any reductions secured via the offset fund to offset the additional demands of new development;
- Reduce road traffic in absolute terms, not just the rate of growth of traffic;
- Support habitat management and creation, including adaptation to climate change;
- Improve landscapes and access to the environment for recreation at a greater rate than development damages landscape or restricts access.

Making this principle operational would therefore require two things:

- A systematic assessment of the effects of development (both positive and negative) on all significant aspects or qualities of the environment; and
- A mechanism to secure offsets for all significant negative impacts on a more than one-to-one basis, and/or additional public spending to cover this.

‘enhances social welfare’

We suggest that ‘social welfare’ should be interpreted broadly to cover the full range of quality of life outcomes potentially influenced by development. There has been considerable debate about wellbeing and quality of life; however a 2002 report by the Cabinet Office Strategy Unit *Life satisfaction: the state of knowledge and implications for government*, (Cabinet Office, 2002) (http://www.strategy.gov.uk/seminars/life_satisfaction/index.asp) still summarises it very interestingly: see annex 3.

This suggests that economic development should value and support:

- Industries, sectors and companies which can offer (relatively) stable and secure employment, without excessive pressures;
- Businesses that meet local needs and have high local multipliers;
- Development that tends to reduce rather than increase income inequalities;
- Community and co-operative organisations and activities which meet needs or add to wellbeing outside the traded economy;
- Work-life patterns that give people time and energy for family, social, personal and cultural life, and support healthy living, eg commuting on foot and by bicycle, healthy eating.

These will all tend to increase the resilience of local communities, that is, their ability to cope with and continue to function and thrive despite externally imposed stresses and threats.

‘can be sustained ... avoids greater extremes in future economic cycles’

We are far from fully understanding the current economic crisis. However it is already clear that the deliberate removal of regulations, restrictions and friction from trade, travel and financial speculation, and the neglect of primary production, manufacturing and connection between economic activity and local needs could not be sustained, and has caused greater ‘extremes’ in the current economic cycle than have been seen for decades.

In addition the food and energy price spikes in 2008 provided a warning of the dangers of foreign trade for essential commodities, especially given increased demand from China and India and the likelihood that climate change will disrupt supplies in future.

This criterion therefore implies the desirability of increasing the resilience of regional and local economies by:

- Reducing vulnerability to imported commodities, by ensuring that alternative capacity for primary production and manufacturing is maintained close to home;
- Safeguarding future food growing capacity by moving to methods which maintain soil quality with lower chemical inputs, and accommodate wildlife;
- Developing low carbon, low resource goods and services;
- Shortening and simplifying supply chains;
- Reducing dependence on traded financial services;
- Promoting businesses with bigger local economic multipliers (eg sourcing more inputs locally, selling more in local markets, and spending more wages and profits locally);
- Seeing a certain degree of cost in trade and transport as desirable to contribute to economic stability and reduce vulnerability to external changes
- Promoting credit unions, cooperative food schemes, fuel clubs, local exchange and trading schemes and such like.

Interestingly, these directions of change are also generally good for living within environmental limits and promoting welfare.

One consultee objected to the recommendations on economic wellbeing and alternative economic pathways because they ignores the neoclassical economic arguments for free trade and competition as means of promoting growth. However several interviewees particularly welcomed these recommendations and endorsed the reasoning in the paper that rethinking the nature of economic progress and how it is measured is an indispensable part of embedding sustainability in regional governance.

2.6 Potential risks and downsides of the proposals, and ways to address them

These proposals may be criticised as (1) excessively stringent, (2) inconsistent with the Government’s emphasis on economic growth as the primary driver of the SNR and (3) utopian.

We consider these in turn.

(1) The climate change requirements are based on the Government’s climate change commitments which are based on the best available scientific evidence. The proposed approach on environmental limits is no more than an attempt to make operational principles clearly endorsed by Government.

(2) The recommendations treat economic growth as a means rather than an end in itself. The only element of the SNR starting point which is not clearly supportive of sustainable development is the commitment to 'economic growth': it is not clear what including economic growth as a separate objective adds to the five bullets. What could growth be *for* above and beyond contributing to social welfare, looking after the environment (including the climate) and reducing future vulnerability? Or, put the other way round, provided we were achieving all these, would it matter whether the economy was growing or not? This is a particularly pressing point at present when economic growth (as conventionally measured) has stopped, appears unlikely to resume in the short term and is not to be assumed or relied on in the medium to long term, but all the other objectives are pressing and potentially achievable.

(3) Scandinavian countries already show that it is possible to promote life satisfaction and improve human wellbeing together. Interestingly they also tend to have high economic growth measured in GVA terms. They achieve this through (among other things) high levels of taxation, public provision and state intervention. A respect for evidence would therefore imply giving serious consideration to such welfarist / social democratic models of economic progress as potentially better able to achieve and to reconcile the full range of objectives included in the Government's definition of 'sustainable economic growth' than a return to the 'Anglo Saxon' model of competition driven growth which has led to the current failures to deliver life satisfaction, environmental sustainability or even economic growth as narrowly defined. There was a strong message from the workshop that the SNR must be grasped as an opportunity to rethink the region's economic trajectory and not just to attempt to return to 'business as usual'.

3 The process of developing the new single regional strategy (RS)

3.1 Post SNR starting point

The Regional Strategy will combine the functions of the current Regional Spatial Strategy and Regional Economic Strategy, and will be prepared jointly by RDA and LA leaders Board.

3.2 Principles and objectives we suggest the new arrangements should meet

The RS offers an exciting opportunity for coordinated planning for sustainability. To grasp this, the development of the RSS should:

- Take account of the agreed sustainable development principles outlined in the Integrated Sustainability Framework for the Region (January 2009)
- Reconcile and integrate multiple social, environmental and economic objectives to the greatest degree possible
- Be produced in a way that responds to economic and social aspirations of the region
- Maximise consensus and buy-in – including from those who will be expected to deliver it
- Coordinate spatial planning with infrastructure and public service delivery
- Take a ‘whole system’ approach to enabling sustainable living, including enabling step change to different patterns of living in specific places

3.3 Regional context

The East of England has already taken significant steps towards achieving these objectives so far as possible within current institutional arrangements:

- Both RSS and RES include broad sustainability objectives (see section 2)
- The RSS production process largely follows the ‘practical proposals’ set out in section 3.4 below
- Large parts of the Regional Assembly’s draft RSS were written by working groups including relevant public and private sector experts (though important parts were then rewritten by civil servants)
- Likewise parts of the RES were ‘co-produced’ by organisations including the Environment Agency and Natural England with EEDA
- The Joint Implementation Plan integrates RSS and RES

3.4 Practical proposals

The RS should be developed through an inclusive, iterative process with stages including:

- An open public debate about social, economic and environmental goals and priorities for the region’s future, possibly involving visioning, scenario building or future search techniques, able to articulate choices about (for example) the *kinds* of economic development (and not only the rates of growth) that would best meet the needs and aspirations of the region’s residents
- Generation of a wide range of options and alternative ways to work towards the goals set
- Reasoned selection of preferred options
- Detailed working up of packages of development policies, public service delivery commitments and infrastructure investments to achieve the preferred options by topic working groups;
- Consultation, modification

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- Examination in public as an active, iterative process, feeding back into development of the strategy
- Decisions on changes to respond to Examination in Public by the regional strategy authors.
- Sign-off by an appropriately representative regional body
- After regional sign-off, Government should only make changes in exceptional circumstances
- Sustainability appraisal integrated throughout the process (discussed in chapter 6)

Topic working groups should include representatives of relevant providers but also customers / users / beneficiaries. Likely topics, and organisations which should be involved, would include:

- Economy: EEDA, LSC, representatives of small businesses (particularly low carbon), academia (R&D opportunities), co-operative and community sector
- Access: spatial planners, health, education and other public service providers, , public transport providers, Highways Agency, Sustrans, British Cycling Forum (the proposed title is access rather than transport because the challenge should be framed in terms of giving people access to amenities, and transport and mobility treated as means to achieve this rather than ends in themselves.)
- Health: health service trusts, spatial planners, public health, sport and recreational interests;
- Climate change mitigation: spatial and transport planners and service providers, construction industry, energy industry
- Environment and resources: EA, NE, EEEF, waste companies; water companies
- Life quality: Culture, recreation, sport, voluntary action, Olympics delivery organisations
- Physical planning, infrastructure and public investment, organisational / institutional development (interface with SCSs/LSPs)

3.5 Reasons for these proposals

Much of this builds on positive aspects of current planning practice. The proposed process has similarities to that for developing the RSS, because it needs to meet the same requirements to ensure that the influence it exerts over how people can use their property and live their lives is justified and legitimate:

- to provide adequate opportunities for a wide range of interested parties to contribute to its development
- to give objections and challenges due consideration
- to reconcile and integrate conflicting requirements so far as practicable.

The proposals are however designed to connect this to two things whose current disconnection reduces the positive potential of planning:

- ‘Upstream’ vision setting processes. Processes such as Local Agenda 21 and now Transition Towns, have succeeded in articulating inspirational visions for sustainable futures, but have made little difference because they have not been connected to mainstream policies and programmes;
- commitments to investment in infrastructure and services to ensure that spatial and development policies deliver the intended results: for example commitments to invest in public transport and high quality local public services to make traffic – restricted development attractive and viable; heat distribution infrastructure to enable combined heat and power / district heating.

3.6 Potential risks and downsides of the proposals, and ways to address them

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Long and complicated?

Local Agenda 21 visions often subordinated economic growth (in GVA/GDP terms) to other economic (as well as social and environmental) goals. Would a community vision-driven planning process be consistent with the Government's growth objectives? Possibly not – but if a valid and representative (see next point) community visioning process called for different economic priorities (for example inclusiveness, security, resilience, satisfying work), should these not take priority?

Local Agenda 21 and similar visioning processes typically only engage small and unrepresentative samples of residents. However this may well be because they did not connect to decision making processes.

4 New regional governance structures for the East of England post-SNR

4.1 Post SNR starting point

The Regional Assembly will be abolished.

A Local Authority Leaders Board will be created. Details are left for each region to decide: Policy Document 3.8 says ‘it is intended the participating local authorities will make a proposal (or ‘scheme’) for each region’s Leaders Board which sets out

- Membership
- Decision-making process
- How and when it will refresh or re-elect its membership
- Managerial structure and organisation’

Policy Document RS 3.7 says ‘the participating authorities ... will need to agree amongst themselves what mechanism they will use to allocate seats on the Leaders Board.’

The Regional Strategy is to be produced by the RDA and Leaders Board together. Clause 67 of the LDEDC Bill states that the LALB and RDA jointly form the ‘responsible regional authority’ to oversee and sign-off the RS. It does not mention the involvement of others. Again the details are left to regional discretion: Policy Document 4.5 says: ‘each region’s Leaders Board and RDA, as equal partners with joint responsibility for producing the RS, will together devise working arrangements which best suit their needs.’

Two new parliamentary committees will be set up for each region:

- A regional Select Committee, with membership proportional to national (not regional) party balance in House of Commons, to meet a few times a year, carry out inquiries into its own choice of matters of regional interest and publish reports
- A regional Grand Committee, consisting of all the regional MPs, to meet once or twice a year, to put questions to the regional Minister and hold debates on matters of regional interest.

4.2 Principles and objectives we suggest the new arrangements should meet

Stakeholders representing sustainable development interests should have an established involvement in making important regional strategic and policy decisions, not only an advisory input. In particular, the body which signs off the RS should include representation of a wide range of views and perspectives, not only those of the major political parties, including knowledge of the economic, environmental and social aspects of sustainable development.

Two ideas underlie the recommendations:

- (1) Sustainable development requires reconciling and integrating a range of different economic, social and environmental aims. A decision making body is more likely to reach sustainable decisions if its membership reflects knowledge and aspirations on all these, and if its processes encourage debate, accommodation and consensus rather than polarisation;
- (2) It is valuable for multiple interests to contribute throughout the process of developing a strategy such as the RS (as is discussed elsewhere in this document) – not least because they can learn from each other. But this is most important at the point where final decisions are taken, since sustainable policies and approaches developed in earlier stages only have effect

if they are in fact endorsed. As Bishop Benjamin Hoadly remarked: "Whoever has an absolute Authority to interpret any written, or spoken Laws; it is He, who is truly the Law-giver, to all Intents and Purposes; and not the Person who first wrote, or spoke them."¹⁰

4.3 Regional context

Building on a long history of partnership working, discussions are underway for setting up a Joint Strategy Board consisting of equal numbers of RDA Board members and local authority leaders, and (possibly, but not agreed) other stakeholders.

On 5 March 2009 EERA published a consultation document 'The end of an EERA: what future for regional government arrangements in the East of England'¹¹ which includes suggestions for reconciling the need for a small and decisive statutory Leaders Board with wider accountability by also setting up 'a broader regional grouping of all of the principal councils in the region, not least to 'hold the Leaders' Board to account' for its actions in working with EEDA on the SRS'. It notes that 'The Government's SNR model is somewhat unclear about the precise nature of the joint working arrangements between the Leaders' Board and EEDA when working as the 'regional responsible authority', and where final decisions should be taken' and specifically invites view on 'this important issue'.

4.4 Practical proposals

Four options, best first:

(1) Ideally the regional responsible authority (which signs off the RS) should include representatives of social, economic and environmental interests, and of local government politicians in rough proportion to their following in the region (which, given our electoral system, will not necessarily correspond to the distribution of control of local authorities at either or both tiers.)

(2) Failing this, the EEDA Board representatives on the responsible authority could cover a wide range of interests if – but only if - there were procedures to ensure that appropriate representatives were on the EEDA board and were then appointed to the responsible authority. Many responses to the SNR and Prosperous Places consultations advocated changing the composition of RDA Boards to reflect their new wider responsibilities, but Government does not appear to have taken up the suggestion.

(3) To the extent that the regional responsible authority itself does not have a balance of representation, it will become more important that other bodies fill the gaps and have strong enough powers of oversight and scrutiny to make a difference to decisions. The broader grouping of East of England Councils, proposed in *End of an EERA*, could contribute to this, especially if 'topped up' to improve proportionality to votes cast and/or including social and environmental representatives.

(4) To the extent that these various possibilities still left important interests not covered, more weight would fall on sustainability appraisal, and on a future sustainability champion body, and

¹⁰ Sermon preached before King George 1 in 1717, quoted at <http://www.cambridge.org/catalogue/catalogue.asp?isbn=9780521600781&ss=fro> (and many other places)

¹¹ <http://www.eera.gov.uk/Who-we-are/future-of-eera/>

their independence and traction would become more important. These are discussed in chapters 6 and 7 below.

4.5 Reasons for these proposals

The Regional Strategy (see below) will bring together spatial planning powers previously exercised by EERA, the delivery powers of EEDA, and roll up various other strategies too. This means the RS will have unprecedentedly extensive powers over how the region's residents can use and develop their property and live their lives. This calls for correspondingly strong accountability.

We do not expect the new parliamentary regional committees to make any significant contribution to the sustainable development governance of the region because of their lack of time and resources and competing demands. (Annex 4 explains this in detail.) There is thus potentially a 'scrutiny gap' unless new arrangements ensure not only that representatives of a broad range of sustainability interests can make inputs and express views, but that these views have 'traction' at the points decisions are taken. The recommendations in this section, and sections 5-7, are designed together to address this.

The SNR proposes that the RS be produced 'jointly' by the RDA and Leaders Board. (The process of producing the Regional Strategy is discussed in section 3 above: this section is concerned only with its final 'sign off'.) Policy Document para 4.5 (quoted above) stipulates that the RDA and Leaders Board should be 'equal partners with joint responsibility for producing the RS'. However parity of esteem does not necessarily imply a strictly identical contribution to the process. Given that EEDA has more executive delivery capability than the Leaders Board, while the latter has more direct democratic accountability, a sensible distribution of responsibility would be for EEDA to take the lead in production of the RS and for the Leaders Board to take the lead in its adoption.

The broader grouping of East of England Councils, proposed in *End of an EERA* would cover part of this role, particularly if the suggested 'top up' to better reflect political balance were implemented in a way that improved proportionality to votes cast, not only to councillors elected or authority control: this would help address the concern that local authority leaders are bound to address in part from a party perspective. (London is of course a special case making direct comparisons risky, but it is interesting that the London Assembly, with a 'regional' scrutiny role, is elected on a roughly proportional basis, has always included some minority party members, and has taken a notably creative, forward looking and consensual approach to sustainable development issues.)

However this would not cover environmental, social and economic perspectives directly. From a sustainable development viewpoint, having representatives of social and environmental partners on the east of England Councils could meet this requirement; however it is not clear the Government would favour this. EEDA Board members on the responsible authority would cover some (though not all) economic ones. They could also represent environmental and social (for example health) interests, and those of small businesses if – but only if – there were some process to ensure first that the EEDA Board always included people with strong knowledge and credibility in these fields, and second that such people were included in EEDA's members of the responsible authority in a reasonably similar proportion to those with economic backgrounds. There are no current proposals to achieve this. If this were not the case, then there would need to be some other means of giving social and environmental representatives involvement in the final decisions on the RS with comparable traction to that which economic interests will get through EEDA's representation on the responsible authority.

4.6 Potential risks and downsides of the proposals, and ways to address them

These proposals appear counter to the Government's apparent aim to restrict top level regional decision taking to RDA board members and local authority leaders. If the higher options offered above are turned down, the lower ones become more important as damage limitation. However we would argue that a broader and more inclusive approach would not only help achieve better decisions – for the reasons set out in this section – but would also improve the chances of support for changes which are still contentious and depend on political support.

5 Effective representation for non-Governmental stakeholders

5.1 SNR starting point

Regional Assemblies are to be abolished, and Leaders Boards created.

PD says (paras 3.17-3.19): ‘The Government is committed to stakeholder engagement as a fundamental feature of the processes for developing and delivering the regional strategy. There will be a wider legal duty to consult and engage stakeholders. This is covered in Chapter 4.

It will be up to each region to decide how to engage with economic, environmental and social stakeholders. The Local Authority Leaders Board and RDA may wish to explore alternative arrangements for ensuring an effective input from partners, many of whom have extensive knowledge, skills and experience which could benefit Regional Strategy production. There are a range of options that could be considered. These include establishing a consultative committee; seconding expertise from stakeholders or possibly appointing a stakeholder representative to a Local Authority Leaders Board or on a joint regional Strategy Committee

The responsible regional authorities will need to involve Government agencies such as the Homes and Communities Agency, Highways Agency, Environment Agency, Natural England and English Heritage. These agencies are the Government’s statutory advisors and regional authorities should work closely with them to benefit from their expertise, advice and knowledge at an early stage in preparing regional strategy.’

PD para 4.23 adds: ‘Engagement will be expected to be wide-ranging, meaningful and contribute to building consensus around the regional strategy.’

5.2 Principles and objectives we suggest the new arrangements should meet

The principles set out in the quote from 4.2(2) of PD are admirable. For engagement to be ‘meaningful’ and ‘contribute to building consensus around the regional strategy’, it is not sufficient merely to ensure opportunities for stakeholders to express their views, but necessary also to ensure that those views will be taken into account in decision taking. The acid test of this will, of course, be that it is possible for stakeholder views to result in a significant difference.

5.3 Regional context

A range of organisations are already involved in ‘co-production’ of the RES.

5.4 Practical proposals

Social and environmental umbrella groups should have power to nominate members to all RS working groups, to discuss and comment on papers. They should have representation on executive and decision taking bodies.

5.5 Reasons for these proposals

The repeated use of the term ‘engagement’ rather than only ‘consultation’, and reference to ‘effective’ input and ‘meaningful’ engagement’, make clear that the Government’s intention is that stakeholders should be able to make a difference, not merely to express views which policy makers may or may not take account of. All the options identified in the quote at 3.18 above have value in bringing a wider range of knowledge and perspectives to bear on strategy

production and decisions. They should be seen as complementary, not as mutually exclusive options. However only the final one, of stakeholders having a right to participate in the discussions when significant decisions are taken, would ensure that sustainable development perspectives are taken into account.

During the consultations on these proposals, a small minority of respondents argued that there was no need for stakeholder representation on decision making bodies, because local government leaders can represent the full range of public interests including sustainability. It was argued that their job is to integrate and reconcile multiple objectives; it should be up to them how much weight to give to sustainability, and there is no justification for privileging sustainability over any other particular interest. However the great majority of respondents supported the proposals as set out above because they did not accept that a small group of local authority leaders could be relied on to embrace the full range of sustainable development principles to the extent they should. The crisis of legitimacy of elected politicians which has subsequently blown up tends to underline the importance of broader involvement.

5.6 Potential risks and downsides of the proposals, and ways to address them

Stakeholders are disparate. Some means would be needed to ensure that necessarily small numbers of participants could both cover issues adequately and be seen as representative by others. Choosing, allocating and briefing representatives is a potential role for the sustainability champion body: see 7 below.

Several interviewees noted that the SNR proposals, including the draft Bill, turn their back on the 'big tent' approach embodied in the former Regional Assemblies and expressed doubts whether these recommendations, with their strong emphasis on involving a broad range of interests in decisions, would find favour with Government. However, most respondents agreed with the reasoning behind the recommendations, and thought they should be made anyway: the purpose of this work was to identify and argue for the best possible approaches, not to try to predict the positions others might take and say the same. However it was generally agreed to be prudent to identify fallback positions in case the preferred recommendations were not accepted.

6 Effective and independent challenge on SD (including appraisal and scrutiny)

6.1 SNR starting point

RSs will be subject to sustainability appraisal / strategic environmental throughout the development process.

6.2 Principles and objectives we propose the new arrangements should meet

Appraisal should:

- cover the full range of environmental and quality of life objectives
- be independent
- be able to influence the RS

6.3 Regional context

The RES has already been subject to an integrated impact assessment bringing together

- Sustainability Appraisal covering impacts on the economy, the community and the environment;
- Strategic Environmental Assessment as required under the EU Directive;
- Equality Impact Assessment covering impacts on groups including women, older people and ethnic minorities;
- Rural Proofing;
- Urban Proofing;
- a specific examination of the RES's impacts on health and health equality

The Integrated Sustainability Framework provides a basis for appraisal objectives in future.

6.4 Practical proposals

We recommend that sustainability appraisal of the RS should:

- Be integrated, including health and equalities assessment as already carried out for the RES;
-
- Test resilience under a range of possible future scenarios, drawing on any available regional futures forecasts;
- In particular, test the RS systematically and explicitly against a range of future climate change scenarios covering not only the effects of more extreme weather and climate within the region (including flooding, heat waves, drought, storms and the need for coastal managed retreat reversion of parts of the fens to wetland) but also indirect effects and economic effects (eg vulnerability of insurance industry to environment related claims, price rises and shortages in imported fuel and food, reductions in international demand for inessential and/or carbon intensive goods and services, ecological refugees etc)

Guidance for SA of RSs should reiterate and reinforce some well established good practice precepts which are currently not fully applied:

- SA should start as early in strategy development processes as possible.

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- The emphasis at scoping stage should be on exploring and raising awareness of all the ramifications and possible sustainability impacts of the RS, and focusing subsequent work on the most significant ones.
- Early, informal engagement of the appraisers with the strategy authors should be given high priority and sufficient resourcing. This should be reflected in appraisal guidance, especially quality checklists.
- Reports should be short and concentrate on major issues.
- Non matrix methods of presenting appraisal findings (eg ‘commentary’ style reports, topic papers) should be used instead where these are more effective in informing and influencing plan authors.
- Appraisal should test against sustainability outcomes. Should include those discussed under monitoring above: living within environmental limits, reducing climate change in line with Government targets, improving welfare and life satisfaction
- Distinguish ‘less bad’ from ‘good’, and ‘good’ from ‘good enough’: for example if all a plan or strategy can do is retard or reduce an unsustainable trend or change such as growth of road traffic, appraisal must clearly show that ‘less bad’ is not the same as ‘good’. Moreover even where a plan or policy is achieving a net improvement, appraisal should clearly state whether this is good enough to achieve sustainability.

To ensure that appraisal does actually influence the RS, we recommend that:

- If, as currently proposed, the Examination in Public of a RS becomes an iterative process starting while the RS is still under development and feeding in to successive drafts, then successive iterations of the SA should be reported to the EiP panel to inform its choice and examination of issues;
- Each SA should identify any significant outstanding recommendations from the SAs of ‘ancestor’ strategies, and record explicitly whether they are (a) overtaken by events, (b) satisfactorily responded to by the current strategy, or (c) still relevant and still outstanding;
- Appraisal should explicitly consider the likelihood of RS policies actually being implemented and effective: ie seek to appraise what is likely to happen, not necessarily just what the words say. (Providing a ‘reality check’ on the practicalities of implementation is a further reason why representatives of deliverers / implementers need to be involved from the start);
- Plan authors need to be under a stronger obligation than at present to give serious consideration to major recommendations of SA, though without usurping their ultimate responsibility and discretion. One possible mechanism would be for appraisers to have the option of flagging up as ‘sustained objections’ any recommendations which the plan authors rejected where the appraisers were not satisfied with the reasons given and thought the point important enough to pursue. The Examination in Public would be required to consider all such sustained objections.

The concentration of power in the new RSs, and the recommendations just made for SA to have more influence over the RS, increase the importance of ensuring the independence of appraisal. Possible methods for achieving this include:

- Having the appraisal commissioned by and reported to a body other than the producers of the RS (ie the RDA and Leaders Board): this could potentially be the sustainable development champion body proposed at 7 below (provided this fitted with other considerations about its role);
- Having the appraisal managed and signed off by a steering group drawn from a wide range of regional bodies including those outside the RDA and Leaders Board

This need not, and must not, prevent the close cooperation between appraisers and plan authors advocated above.

6.5 Reasons for these proposals

The proposals are designed to respond to problems and weaknesses identified from recent research and practice:

- Unnecessarily and unhelpfully long and obscure appraisal reports without clear priorities
- Appraisal reactive, chasing after strategy decisions, too late to actually influence them
- Inappropriate, unhelpful objectives
- Findings and recommendations politely ignored
- Risk of 'He who pays the piper calls the tune' conflicts of interest: where appraisal is commissioned, managed and paid for by the same organisation that wants its plan or strategy endorsed, there is an obvious incentive for appraisal consultants not to 'rock the boat'. The reduction in the number of strategies and strategy producers will increase the pressures on consultants to be cooperative to stay on future tender lists.

The proposals, and the reasoning behind them, are largely consistent with the recommendations of a major study of the effectiveness of SEA commissioned from Scott-Wilson consultants by CLG¹². Among other things this proposes that regional sustainability champion bodies should commission sustainability appraisals of regional strategies.

At the workshop the suggestion was raised that the EiP panel could commission and project manage the SA. This would have the merits of independence, ensuring that SA conclusions and recommendations had the opportunity to contribute to the examination, and fitting with the more proactive and engaged form of examination envisaged. However it would also have potential problems:

- Planning inspectors, inquiry managers and secretariats are not currently trained or necessarily equipped to project-manage sustainability appraisals, and already have full and demanding workloads. They would not necessarily welcome or give this extra responsibility the time and attention it warrants;
- Inspectors are not sustainability experts or specialists, and could not be relied on to give high quality insight, guidance or critical comment;
- Inspectors need to apply rules precisely and strictly. This could discourage appraisal considering issues properly in the round when this requires looking beyond a narrow definition of scope, for example reminding policy makers that expansion of aviation at Stansted will more than negate even ambitious and successful measures to reduce all other sources of greenhouse gas emissions in the region.

The discussion concluded, on balance, that the disadvantages outweighed the potential benefits and this suggestion should not be pursued. However it will be important to ensure that inspectors have a strong understanding of sustainability issues so they can make good use of sustainability appraisal inputs.

¹² Presentation by Dr Stephen Smith to Institute of Environmental Management National Environmental Assessment Forum 30 April 2009, [to be available on IEMA web site]

The new Parliamentary Regional Select Committee and Grand Committee are not discussed in this chapter because chapter 2 argues that they will have very limited capacity for sustainable development scrutiny as currently envisaged.

A small minority of respondents argued that it was inappropriate and unnecessary for this document to propose detailed provisions for scrutiny and appraisal, because it would be better to mainstream sustainability into decision processes rather than set up elaborate procedures to try to enforce it from the outside. It is hard to disagree that it would be better if all planning and decision processes automatically took sustainability fully into account, and appraisal and scrutiny were unnecessary. However nobody seriously argued that we were close to this position now. The great majority of respondents supported the provisions proposed in the paper and felt that sustainability appraisal and scrutiny would be necessary for some time to come.

6.6 Potential risks and downsides of the proposals, and ways to address them

Appraisal needs to be kept proportionate.

7 Expertise on SD within the region

7.1 SNR starting point

Maintaining and enhancing expertise and support for sustainable development in the regions does not feature in the SNR proposals.

7.2 Principles and objectives we propose the new arrangements should meet

There is a need for some means to ensure that the more difficult / inconvenient bits of sustainable development are not crowded out by more pressing concerns, and that new opportunities are identified and grasped. This will become more important than ever given the SNR's aims of streamlining processes and emphasising delivery and results. This calls for some component of regional governance which is

- Focused on sustainability as its sole objective, not one among many conflicting priorities to be juggled;
- Able to operate both reactively – scrutinising plans and programmes for sustainability – and proactively – developing future approaches and setting the agenda for others;
- Not beholden to the bodies it is trying to influence for its operating resources;
- With sufficient standing and connection to mainstream decision processes to ensure that its views are taken into account.

7.3 Regional context

The Region already has a sustainability champion body, Sustainability East (created in 1998 as the Sustainable Development Round Table). Its activities and achievements include:

- Developing Toolkit East, an on line sustainability appraisal toolkit based on the region's sustainable development framework;
- Helping embed sustainability in local area agreements;
- Contributing to earlier stages of consultation on the Sub National Review;
- Commissioning a carbon inventory and reduction scenarios;
- Producing a sustainable procurement guide for smaller construction businesses
- Producing comprehensive studies on specific natural resource and climate change issues pertinent to the region , which have influenced key strategies such as the RES and RSS.

7.4 Practical proposals

Sustainability East has a continuing role, justification and work programme quite independent of the SNR. However the SNR creates additional reasons why there should be an independent sustainability champion body for the East of England which should:

- not be a part of any other institution;
- have membership mostly nominated by the sustainable development policy community (including statutory and third sector environmental and social NGOs);
- have core public funding, committed on a rolling 3 year basis, sufficient to maintain high calibre permanent staff and research capability;
- have responsibility (and resources) to commission, project manage, quality-assure and publish sustainability appraisals of regional strategies and programmes;
- be represented on significant regional decision making bodies, including full (voting) participation in Regional Strategy preparation working groups

- be able to contribute to the development of national and regional policy.

7.5 Reasons for these proposals

Promotion of sustainability needs both reactive and proactive work. The ‘reactive’ strand is to make sure that, despite all the competing pressures and demands, regional bodies and strategies take account of the full range of sustainability objectives. Even with the best intentions, public organisations under pressure to deliver results efficiently tend to promote those aspects of sustainable development which fit best with their core responsibilities, and allow the more problematic and difficult ones to drift. This tendency is entirely natural and expectable, but must be guarded against if the new processes and institutions are to succeed in promoting sustainable development in the round. Expressions of support for sustainability principles are not enough: there needs to be machinery to make sure they are applied even when inconvenient, and not only when they fit what an organisation wants to do anyway.

As already discussed, sustainability appraisal of the RS should play an important role in this. But it will only work effectively if (1) appraisal is driven and managed to be full and balanced, and confront difficulties as well as praising successes; (2) appraisal recommendations are followed up to make sure they are acted on unless there are good reasons to the contrary; and (3) there is a background culture of awareness of sustainability issues and opportunities.

The discussion of sustainability appraisal in chapter 6 above has already proposed that appraisal should be commissioned by a body independent of the RS producers (that is, the RDA and the Leaders Board).

In any case formal appraisal only reaches formal plans and strategies: sustainability has to be ‘mainstreamed’ in to work. This requires continual reminding and encouragement.

The ‘proactive’ strand of sustainability promotion is to identify, research and promulgate new solutions and methods, and to act as an animateur to bring organisations together to deliver them. This will become increasingly important as we reach the limits of incremental improvements and will increasingly need to formulate and achieve transformational changes.

For example, the scale of carbon reduction needed for climate security will require a radically different ecology and economy of energy, in which:

- public services as varied as waste collection and parks management treat harvesting energy sources as a primary objective;
- decentralised facilities such as anaerobic digesters convert energy at neighbourhood level;
- local power and heat distribution grids enable it to be cascaded through several uses;
- smart charging regimes such as rising block tariffs, with smart metering to implement them, enable and incentivise producers to use energy sustainably;
- individual buildings, street layouts, neighbourhood services, including employment and business, and transport infrastructure are all designed to minimise the need for energy in the first place.

This is easy to state, but will be hard to achieve, especially starting from a position in which unintended consequences of many current policies and decisions push in the wrong direction, including an energy supply system based on driving prices down through competition to public services seeking to cut costs by closing smaller outlets. We urgently need institutional and social experimentation and entrepreneurship to find ways to reconfigure services and behaviours

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to achieve more sustainable futures. And this will best be driven by a body whose primary aim is sustainability, rather than one for which it is a sideline.

Both the reactive and proactive challenges call for an independent, adequately resourced, regional sustainability champion body. This will remain the case for as long as any plans and decisions are made at regional level. The justification for SE's continued existence therefore does not depend on the SNR, and engaging with the SNR will be only a part (albeit an important one) of SE's future activities. However the SNR strengthens the case for a strong independent champion body because it opens up extra opportunities for sustainable development (as discussed elsewhere in this document), but also creates pressures towards narrow delivery that risk missing those opportunities unless there is an energetic pressure to take them.

It does not necessarily follow that SE should simply take on any wider SNR related work. However it would make sense for there to be only one regional champion body.

The structure of funding is as important as its scale. Nobody likes not knowing whether their job will still be there next year, so if funding is insecure (for example only renewed year by year), good and committed staff will tend to leave when they get the chance of more secure jobs. Even if good replacements can be appointed quickly, the transaction costs of recruitment and induction are considerable, and the loss of continuity can set work that depends on networking and trust back years. Seeking partnership or match funding looks a good idea in principle, but can easily take up disproportionate amounts of staff time and distort priorities to chase funds. We therefore recommend the apparent extravagance of full public core funding on a three year rolling basis public because it is likely to prove more cost effective overall.

Annex 1: Some challenges for regional sustainability

Levett-Therivel's proposal to carry out this work included the following overview of challenges for regional sustainability. (This is not a statement of Sustainability East policies.)

We (all) need to do much better

The East of England has some excellent pro-sustainability strategies, policies and initiatives including aspects of both the RSS and the RES. But, as throughout the UK, current policies and programmes are clearly failing to deliver crucial aspects of sustainability, notably climate security. If government at all levels is really serious about the commitments in Securing the Future and many subsequent statements and policies, the SNR needs to be grasped as an opportunity to do much better across the whole range of sustainability issues, and not just to sharpen economic delivery. The rest of this section discusses some of the main areas which we suggest this project should address.

First we need to stop making things worse

Big decisions are still being taken and implemented that will substantially worsen well known sustainability problems. Examples include airport and road expansion, continued construction of housing that will over decades to come need far more energy and water and motorised transport than is either necessary or sustainable, and major development in areas of high and increasing flood risk, notably Thames Gateway.

There are strong drivers (and, arguably, good reasons) for these. But they undermine sustainability policies and commitments. For example our research in the South West showed that the climate change impacts of projected air and road travel expansion would more than negate all the positive climate change impacts of a (highly ambitious) draft RSS.

A prerequisite of regional governance for sustainability must be to recognise and deal adequately with changes against sustainability. This project should seek to develop effective mechanisms for:

- Clearly and explicitly identifying developments, actions and policies which are inconsistent with important sustainability goals (including, but not only, rapid reduction in greenhouse gas emissions);
- Applying creativity and joined-up thinking to identify alternative ways to meet needs without the sustainability downsides, with a particular emphasis on obviating unsustainable impacts: for example reducing the need for vehicle traffic and road capacity by ensuring local high quality services;
- Motivating developers to apply the most sustainable methods to minimise remaining impacts;
-

Requiring promoters of unsustainable activities to offset impacts as part of the development package.

Sustainability needs teeth

Much of our recent work shows that strategies only really make a difference if they are backed up by sanctions of some kind or other to require or reward implementation. RSS policies make a difference because, ultimately, they can determine whether or not a developer can get planning permission, and under what (legally enforceable) conditions. The RES makes a difference because it directs substantial spending and other support for businesses. In contrast, as we found

in a study in 2005, the East of England Regional Environment Strategy was widely liked and supported but had made little difference because no organisation was under any obligation or had any incentive to implement it.

This study will therefore need to emphasise mechanisms to ensure that sustainability aspirations and commitments are acted on and implemented.

Objectives and indicators

Objectives and indicators define the terms of debate for regional strategy and policy. The way they are framed can help or hinder pursuit of sustainable development. This is particularly significant for the treatment of economic progress in the SNR. The Sustainable Development Commission (among others) has expressed serious concern that the SNR's emphasis on economic growth measured in GVA or GDP creates an unnecessary and undesirable tension with environmental objectives, while being of very questionable benefit for quality of life. A potential way to remove this tension would be to frame economic objectives in terms of the outcome of human wellbeing, and the contribution economic activity makes to it, rather than just the output of traded production or consumption. For example, more spending on fuel does not mean more wellbeing if it just means higher prices, or wealthy people leaving more empty rooms overheated with appliances on standby while the poor still cannot afford to keep warm. More spending on transport does not mean more wellbeing if people have to travel further to get to amenities that used to be local, or have to buy cars because public transport cannot provide for the fragmented and time critical journeys.

Measures of thermal comfort achieved, or ease of access to amenities, and how these vary with income, tell a very different story about economic progress over the last few decades than per capita GDP. More importantly, they open up policy space for approaches such as incentivising energy suppliers to provide more energy services with less energy, or planning for less need to travel, that can improve quality of life and reduce environmental impacts together by treating economic activity as a means not an end in itself.

Increased awareness of these issues has led several RDAs to experiment with broader measures of economic prosperity including a Regional Index of Sustainable Economic Welfare. This has rightly been criticised as a 'mongrel' measure based on some very questionable methodology. It is not in any sense definitive. But because it at least tries to exclude areas of traded consumption or production that do not add to welfare and include untraded ones that do, it is less arbitrary and misleading as a measure of welfare than GDP or GVA. We think that alternative and broader measures of economic progress should form an important part of the study.

Systemic planning

Individual initiatives and piecemeal incremental change are not enough to deal with some of the biggest sustainability challenges that face the UK. Step change is needed in (for example) reduction in greenhouse gases, housing delivery and transport modal shift. But step change requires breaking 'log jams' that currently obstruct behaviour change. For example, reducing car dependence requires good public transport, cycling and walking facilities and spatial and service delivery patterns that enable more journeys to be made without cars and a change in attitudes and perceptions towards public transport and car restraint and demand management measures. Each of these depends for its practicability, effectiveness and political acceptability on the others, so progress requires coordinated attention to all of them.

More sustainable approaches will often require individual organisations to operate in ways that are 'inefficient' from the point of view of delivering the organisation's own outputs (for

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example, keeping small local shops, offices or surgeries open, or running sparsely used bus services) for the sake of broader outcomes (for example, enabling people to shop without car journeys, or to use peak time buses without fear of being stranded if they are delayed).

Two crucial challenges for planning for sustainable futures are therefore:

- How to get organisations with unconnected aims, remits, client groups, planning and budget processes to act in concert, especially in situations where each organisation sees its own possible actions as risky because they will be futile without the others;
- How to enable organisations to take actions which are suboptimal in terms of their own specific objectives (eg delivering specific services at lowest cost) where this is necessary to support broader aims outside the individual organisation's remit.

The Sub-national Review proposals aim to achieve a more integrated approach by bringing together what are currently separate strategies. An important aim of this project should be to ensure that this helps achieve a more sustainable future, by addressing these challenges.

Annex 2: Environmental limits

This annex discusses issues about the application of the principle of environmental limits in more detail. The first reason the principle of limits is hard to apply is that, although research such as WWF's work on ecological footprint contributes to improve the evidence base, there is still often uncertainty about what level of human pressure will cause what changes in the environment. For example it is clear that climate change will both reduce water availability in the East of England and increase demand (especially in summer, when there is already no spare water). A supply gap is therefore very likely, even without any housing growth at all. But there is still considerable uncertainty about how big it will be, and how soon.

Second, even when we know what effects a given human activity will have on the environment, that does not answer the question whether those effects are acceptable or not. For example, abstraction of water can cause low flows in a river, which stresses the ecosystem by raising the concentration of pollutants, cutting the oxygen available to fish, and drying out water plants. Low flows would occasionally happen in dry periods even without any human pressures. So trying to prevent low flows would be unrealistic, indeed unnatural. But taking so much water that rivers dried up and ecosystems died would be unacceptable. So the maximum acceptable level of water stress in rivers would lie somewhere between these extremes. But exactly where is a matter of debate.

Third, it is often possible for one area to import environmental capacity and/or export pressures to other areas. Water is already routinely pumped between different river basins within the East of England to match supply to demand. There is no reason in principle why this should not happen. More generally it would be absurd to argue that towns and cities could not draw water (and food and other resources) from their surrounding areas.

This might appear to make nonsense of the notion of environmental limits: whenever there is a local shortfall in environmental resources or assimilative capacity, why not simply import capacity from elsewhere? There are three reasons to limit transfers. First, there has to be spare capacity somewhere. If human impacts are overall exceeding carrying capacity, transfers to even out local surpluses and deficits does not help. This is the case with greenhouse gas emissions. Second, moving resources around creates environmental impacts of its own, notably from the transport energy and infrastructure. Third, dependency creates security and political problems.

Water again illustrates these issues. Planning authorities all over southern and eastern England and the Midlands are currently considering relying on long distance water transport to meet future needs. The water is likely to have to come from a long way away: perhaps Wales, Cumbria, Northumbria or Scotland. The engineering challenges would be soluble, at least at a price. It is therefore unlikely that any foreseeable level of growth in the east of England would hit the environmental limit of water shortage in the absolute literal sense of people actually dying of thirst.

However, moving water and other resources around brings disbenefits of its own, including:

- Environmental costs include the energy used in transport, the need for heavy infrastructure, and the damage caused by new and extended reservoirs;
- Insecurity: the further resources are brought, and the more dependent an area is on imports, the more vulnerable it becomes to any kind of disruption, including terrorism, political and economic instability in the supplier countries, and disruption by climate change itself;

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- Political dependency: the last time large areas of mid Wales were flooded to slake middle England's thirst, it triggered the birth of militant Welsh nationalism.

All these disbenefits in turn impose financial costs: for building and maintaining massive new infrastructure, defending it against natural and human threats, possibly rebuilding it after defence as failed; for paying for resources in what is increasingly a seller's market; for providing backup and insurance against disruptions.

How can the notion of environmental limits be made meaningful in the face of these multiple uncertainties? We suggest some rules of thumb:

Kind of uncertainty	Rule of thumb	Application to water resources in East of England
Uncertainty about environmental problems	Make (reasonably) pessimistic precautionary assumptions: the worst case that seems reasonably plausible on current knowledge	Use medium high UKCIP02 scenarios (and equivalent probabilistic level in the new UKCIP projections when they are – eventually! – published)
Judgement about amount of impact acceptable	Avoid further worsening of impacts already recognised as unsatisfactory	Plan to achieve no further increase in low flow problems in rivers; no further net drop in water tables due to groundwater extraction
Amount of reliance on other areas to provide resources / absorb impacts	No net increase in dependence on other areas	Assume no increase in net imports of water from other regions

These rules of thumb have been designed to be the minimum level of constraint that could credibly be regarded as sustainable. Given that most of the latest evidence suggests that human-caused climate change is coming faster and more severely than models have hitherto predicted, this may turn out to be overcomplacent, given that the second and third rules would only achieve no net increase in *unsustainability*.

The first rule of thumb suggests that without any household growth there will be a water supply gap in the region (although how severe is unclear); the second rule implies that this should not be filled by more abstractions in the region, and the third implies that it should not be filled by more imports. The proposed aim that development should not result in any net increase in water demand in the region can only be consistent with the second and third rules if there is still just enough water available in the region to meet current levels of demand. This is optimistic.

This shows that, even though the multiple uncertainties around environmental limits prevent us from stating a precise quantified limit with complete certainty, this does not make the idea of environmental limits incoherent or unusable. On the contrary, this train of reasoning shows that it is possible to provide a robust justification for at least a minimum standard of constraint on impact.

Annex 3: Life satisfaction

This section summarises the main messages of the Cabinet Office research on life satisfaction.

It acknowledges that factors such as genetics, personality, age and gender have a big influence over how satisfied people are with their lives, and also that there are some national differences and trends which cannot (at least yet) be explained by any external factors. But there is also strong research evidence that a range of social, economic and political factors also have important effects on life satisfaction. This section reprints most of the report's very useful summary of these, and then reports its findings on income in more detail.

Work. There is a positive relationship between job satisfaction and life satisfaction. A range of factors influence work satisfaction including: personal control, variety, income, job security, skill use, physical security and job demands. Job satisfaction decreased and employees' mental stress increased during the 1990s – particularly in the public sector.

Unemployment. Being out of work is very damaging to your life satisfaction – though less so if you live in a region with a high unemployment rate; have family members who are also unemployed; or you have been repeatedly unemployed in the recent past. The loss of life satisfaction from the social effects of unemployment is far greater than the loss caused by loss of earnings. In recessions, rising unemployment also affects those who remain in their jobs, reducing their life satisfaction.

Inequality. High levels of inequality are associated with low levels of life satisfaction in Europe, but not in the USA. This could either be because Europeans favour more equal societies, or because the perception of higher levels of social mobility in the US reduces the unhappiness caused by inequality.

Health. Self-reported health has one of the strongest associations with life satisfaction. Its effect is larger in size than changes in employment or marital status. However, objective health status shows a much weaker relationship with satisfaction suggesting that self-reported health may be biased upwards by a positive outlook on life.

Education. Research has found very little effect of education upon life satisfaction other than the separate effects of education on income, employment and other economic factors.

Leisure. People who exercise, play sport, or work in the garden are more satisfied than those who do not. Religious people are happier than average. It is partly the social aspects of leisure or religion that drive up life satisfaction. It has been estimated in the US that going to monthly club meetings, monthly volunteering, monthly entertaining or bi-weekly church attendance each have the happiness equivalent of a doubling of money income. Having friends, supportive relatives and work mates are all correlated with satisfaction with life overall or with one's job.

Relationships. The most important relationship is that with one's spouse. Studies have consistently found that married people are happier than those who were never married, divorced, separated or widowed. This relationship holds across cultures and even when income and age are taken into account. This effect is strong: studies suggest that marriage is equivalent to an increase in income of £72,000 per annum. Conversely, divorce, widowhood and separation all reduce life satisfaction.

Governance. The quality of a country's governance (including stability, control of corruption, and the rule of law) has been found to help explain national differences in wellbeing, other factors having been controlled.

Democracy. Analysis of the relationship between life satisfaction and democracy has found that, in Switzerland, people are more satisfied in cantons with more referenda and higher levels of direct democracy. Around two thirds of this effect is attributed to the ability to participate in the democratic process, and around one third to the closer match between the wishes of the population and the decisions taken.'

Income The research reports two apparently contradictory findings: that individuals' life satisfaction rises with income, but that overall UK life satisfaction has not changed over 30 years despite massive increases in income. Three possible explanations are offered. The first is that *relative* income matters more than *absolute* income. Being higher in the income 'pecking order' gives people access to better things than their neighbours, and it is this ability to 'get ahead of the Joneses' that gives people a kick, rather than the particular forms of consumption they use. An experiment in which more than half of a sample of American students said they would prefer to earn \$50,000 dollars in a society where the average was \$25,000 than earn \$100,000 in a society where the average was \$250,000 supports this.

One person or household can only 'get ahead' by pushing others back, so more gratification for those who rise is always offset by more envy and discontent for those are pushed back. The two effects are not necessarily equal. In Europe it seems that wider differentials reduce life satisfaction. This means that raising a whole society's income does not improve life satisfaction at all. (Of course this only applies to countries wealthy enough to meet all basic needs. It does not mean that poor countries could not greatly increase wellbeing by increasing wealth.)

The second possible explanation for the 'flatline' is that people get used to higher income and expectations and aspirations rise, so they do not produce benefits.

The third possible explanation is that any increase in life satisfaction which the higher income may have caused was offset by worsening in the other, non-income, factors already discussed.

This implies that an economy with higher levels of life satisfaction would not necessarily be one with high incomes or growth rates, but ones where, in general, people:

- Had occupations which were comfortably but not excessively challenging: enabling them to exercise creativity, develop and apply skills and rise to challenges while retaining a sense of being in control and not being overstressed;
- Had relatively similar incomes, with neither poverty nor extreme wealth;
- Had good opportunities to co-operate with others in sporting, cultural and other community and voluntary activities – and had enough time and energy left over from earning their livings and keeping their households running to do so;
- Had fulfilling personal relationships and friendships – and (again) enough time and energy to keep them 'in good repair'; (Samuel Johnson);
- Got a healthy amount of exercise as part of their normal routine;
- Were not subject to uncertainty, insecurity and disruptive change.

How can this be measured? Several regions have used a Regional Index of Sustainable Economic Welfare (ISEW), a composite measure produced by adding to GDP estimates of the value of goods and services which are not traded, subtracting the value of things that are traded but do not in themselves make people better off such as money spent on commuting or pollution cleanup, and taking account of the way more unequal distribution reduces welfare.

ISEW is statistically disreputable. The individual corrections are based on disparate ad hoc fixes: there is no overall consistency between them, nor any rigorous theoretical basis for choosing these particular corrections rather than others. Combining them in a single index hides in a 'black box' what should be explicit judgements about what factors matter and how much weight should be given to them. However the overall shape of the ISEW curve – a flattening off or slight decline from the mid 1970s onwards – is much the same in a range of 'developed' economies, and over a wide range of weightings to the various corrections in the UK. Moreover ISEW is overall less arbitrary *as a measure of welfare* than GVA because it at least attempts to correct the 'raw' figure to take account of the way actions.

Annex 4: The Parliamentary regional committees

This annex explains the reasons for the conclusion that the new parliamentary regional committees as currently proposed cannot be expected to make a significant contribution to sustainable development scrutiny.

Parliament has voted (albeit by small margins and after acrimonious debate: see report of the debate at <http://www.commonleader.gov.uk/output/page2614.asp>) to set up two new parliamentary committees for each English region: a regional select committee and a regional grand committee. This will be done initially as an experiment for the rest of the current Parliament.

The Regional Select Committee will be like a departmental Select Committee: 9 members appointed by the Commons Selection Committee, reflecting the political makeup of the Commons (which would currently mean 5 Labour, 3 Conservative and one minority party member) It will choose its own topics to investigate and report on: the expectation is that these would be topics of major strategic interest to their regions.

The Regional Grand Committee will be like a miniature House of Commons. Every MP for the region would be a member. Each meeting would include:

- Oral questions to the Regional Minister - presumably, like Commons Oral Questions, with provision for supplementaries from both the original questioner and other members to allow them to challenge initial answers and pursue issues further;
- A main debate which Ministers would answer
- A shorter adjournment debate.

Regional Select Committees could choose sustainable development issues as topics for investigation, and Grand Committees could consider sustainability as part of their discussions of the state of the region. However there is currently no requirement for them to do so. Any attempt to impose one would both fetter the discretion of the committees to set their own agendas, which would fundamentally alter the proposal as it has been agreed by Parliament. It would also provoke calls for the committees to be required to look at a range of other issues whose proponents would argue they are as important as sustainability.

In any case, even if the Select or Grand Committees were put under an obligation to carry out sustainable development scrutiny, they would be poorly equipped to carry it out because.

- Their very light proposed workloads – ‘not more than 6’ Select Committee meetings each year, 1 - 2 Grand Committee ones – would not provide enough time for either body to get seriously to grips with the complexities and problems of sustainable development in a region, and keep up with the decisions and actions of the large regional bodies they would need to scrutinise;
- They are to be supported only by a ‘slimline’ central clerking operation, with only half a post per committee available to carry out research, and a proposed budget for ‘commissioned research’ across all 8 Select Committees of £30,000 a year – enough for each region to commission a single not-too-complicated policy consultancy study roughly once every 8 years;
- Political balance reflecting the House of Commons, not the region, and the (potential) presence of MPs from outside the region, will reduce the political legitimacy of the Select Committees, especially compared to local authorities even if, like many national Select Committees, they succeed in taking a non partisan, consensus seeking approach;

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- Membership would reflect only the views of the main parties in the Commons, excluding (for example) Green Party councillors, who have been highly active on many sustainability issues), any local councillors, or any representatives of social, economic and environmental interests.
- Reliance on a small number of MPs, who notoriously already have multiple competing commitments, reduces the opportunity for informed and insightful scrutiny (whatever the calibre of the individuals concerned.)

It would therefore be unrealistic to expect these committees as they are currently proposed to play any significant role in sustainable development scrutiny. However the proposals are experimental. It is therefore perhaps worth suggesting how they could be changed to be more use for sustainable development in future. The investigative, deliberative, consensus seeking approach intended for the regional select committee (and already demonstrated by departmental select committees) could be very valuable, but to reach its full potential it would need to be combined with:

- Enough time, whether of committee members, permanent staff or commissioned support, to investigate and discuss issues in depth, and at the point input can be worthwhile
- A duty to consider and report on progress towards sustainability, and to assess the contribution of regional strategies to it;
- Membership reflecting regional, as opposed to national, interests and groups.

The challenge function envisaged for the Grand Committee could also be valuable – but only if the Committee could be convened more than once or twice a year, and could be used to secure prompt scrutiny of pressing issues, for example through meetings being triggered by a Commons motion signed by a certain proportion of the region's MPs, or by a citizens' petition.

Annex 5: Workshop

These proposals were discussed and refined at a workshop in Ipswich on 18 March 2009 for 20 regional experts invited in a personal capacity. The discussion was under ‘Chatham House rules’: no views expressed will be attributed to individuals. The discussion very largely endorsed and confirmed the paper. Notes taken from the discussion have been used to improve the text. Significant strands of discussion (though not necessarily endorsed by all present) were:

- Emphasis on the need to grasp the opportunity to work towards genuine sustainability. The combination of the increasing urgency of environmental problems especially climate change and the failure of the model of economic development pursued in recent decades to achieve either economic security or human life satisfaction, mean the SNR must be exploited as an opportunity for bold and radical change;
- Emphasis on the interrelations between environmental, social and economic objectives;
- Need a broad conception of economic wellbeing, including community wellbeing, not limited to or constrained by narrow measures of traded activity;
- This piece of work should make a clear case for what would be desirable, and not hold back because of predicted sensitivities;
- Need for implementation mechanisms to ensure that sustainable development objectives can be achieved;
- Need to increase the powers for local authorities to act decisively. Regional strategy needs to enable local action;
- ‘Traction’ matters: sustainable development interests must be represented in decision making processes, not just able to advise;
- Sustainability East has a justification and purpose independent of SNR: must not imply that SE’s future depends solely on SNR.

Participants

Name	Organisation
Richard Powell	RSPB
Gwyn Jones	Norwich CC
Corinne Meakins	CPRE
Chris Dunabin	SE
Andrew Day	Countryside properties
Jonathan Burney	NE
Paul Hammett	NFU
Tim O’Riordan	SE
Vanessa Tilling	Go-East
Johnathan Reynolds	EEDA
Lesley Anderson	EEDA
Debbie Gossman	NE
Ian Monson	NCC
Andy Fisher	EEDA
Dan Davies	NWL
Anna McGillivray	Ursus
Monica Greenwood	NWL
Jonathan Skinner	EERA
Laurie Rainger	Department of Health
Mary Edwards	FOE
Roger Levett	Levett-Therivel
Bruce Cockrean	Global to Local

Annex 6: Interviews

Interviewees

DEFRA: Robbie Blake
EEDA: Fiona Bryant
EERA: Jonathan Skinner
Environment Agency: Jane Hunt
Herts cc: John Rumble
GO-E: Vanessa Tilling
Local Government Association: Philip Mind
Natural England: Jonathan Burney
Norfolk cc: Michael Hand
Sustainable Development Commission: Jayne Ashley
Sustainability East: Richard Powell

CLG and BERR officials declined to comment on the detail of the recommendations but gave statements supportive of the process, re-emphasising the region's discretion, and asking for news on how the recommendations have been received by regional stakeholders. The statements are reproduced below.

Overall views

The interviewees ranged from highly enthusiastic to broadly content, with the exceptions noted below.

Improvements made

Interviewees made a range of suggestions for improvements to the recommendations. The great majority of these were to clarify or add emphasis on points entirely consistent with the existing thrust of the paper. These have all been incorporated in the current draft. The more significant ones are:

- More emphasis on 'joined up government', in particular that the RS should integrate infrastructure decisions;
- Clarify that offsetting should only be a last resort, and that all regional policies and strategies should seek to avoid or reduce negative impacts to the greatest extent practicable before offsetting is considered;
- Explicit reference to the need to involve delivery agencies in process of developing RS, both to ensure it is practicable and to get buy-in;
- Add waste to the lists of environmental pressures to be reduced;
- Say more about opportunities for a low carbon economy;
- Clarify that food growing in the region should be low resource input and low impact, avoid conflict with biodiversity, that the desirability of maintaining bioproductive land did not imply that land should be protected from flooding regardless of cost;
- Do not assume that SE must be the new champion body.

Remaining concerns

One or at most two respondents registered dissents from some of the recommendations:

- Stakeholders need not be represented on decision making bodies, because local government leaders are elected to represent the full range of public interests and should be free to decide how much weight to give sustainability compared to other objectives;
- Government will not support involving wider interests than local authority leaders and development agency nominees in regional strategy decisions;
- It would be better to 'mainstream sustainability into decision processes rather than set up elaborate procedures to try to enforce it from the outside;
- the recommendations on economic wellbeing and alternative economic pathways ignore the competitive advantage arguments for free trade and competition.

Reasons are given at appropriate points why the text has retained the overwhelming consensus majority view on these points.

More generally, most interviewees concurred with the clear message from the workshop that, since the purpose of the exercise is to influence decisions about implementation of the SNR, the report should make specific reasoned recommendations on points which are currently under debate, and should not wait for decisions to be made elsewhere, limit the recommendations to consistency with anticipated future decisions, or confine them to generalities.

CLG and BERR responses

From Eike Ndiweni-Muller, CLG, 27 April 2009:

Thank you for forwarding the proposals document for the East of England. I am indeed one of several people who can provide you with a CLG perspective which is essentially set out in our joint CLG/BERR 'Policy Document on Regional Strategies' (January 2009) which I notice that you quote. For example, as you know

- section 1 refers to the way in which Government understands sustainable economic growth and sustainable development

- paragraph 3.3 states that "It has always been the intention of these reforms to avoid being over-prescriptive about the detailed regional structures and working arrangements..."

- paragraphs 3.17-19 and part of section 4 refer to "other stakeholders" and emphasise both Government's commitment to "stakeholder engagement as a fundamental feature of the processes for developing and delivering the regional strategy" and that "It will be up to each region to decide how to engage with economic, environmental and social stakeholders...etc". This approach emphasises the extensive knowledge, skills and experience of different partners, the need to find arrangements which enable partners to make an effective input and the fact that there are a range of options which could be considered.

Clearly your work in preparing proposals - funded by Defra and EEDA - will help regional stakeholders and the RDA and Assembly to consider which arrangements would be workable and which they would prefer.

At this stage, I think I (or other CLG colleagues) could re-emphasise the principles but would not wish to give a CLG view on alternative options or detailed proposals. However, I can add that we are receiving (via my colleague Roger Chapman) outline change management plans from all regions and that we are engaged in an ongoing dialogue both with regional bodies and other Government departments (including Defra) about the emerging proposals.

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We anticipate visiting individual regions in the near future. It would be helpful in advance of any such meeting with the East of England region, to have an update of how your proposals have been received by the regional stakeholders and how they might be taken forward.

From Steve Michell, SNR Transition, BERR, 8 May 2009

Thanks for sending me your East of England Sustainable Development document. Your draft appears to be thorough and based on a good understanding of the relevant publications and clearly will help EEDA and others in their consideration of work relating to RS development.

I don't think that at this stage we are in a position to give a view on any particular option in your draft or to comment in detail while we are engaged in dialogue with regions and others. We will be visiting the East of England in the near future for broad discussion.

We would, in due course, be interesting to know how your proposals have been received by the various players in the regions.

Thanks again for contacting and best wishes for completion of your project.