



Response to consultation on Shaping the IRS Project Plan

This document is a joint response from the Yorkshire and Humber Regional Environment Forum, a partnership organisation made up of regional bodies, local authorities and non-Governmental organisations.

Overall content

There is a real concern that there are no clear lines of responsibility to ensure that the environmental elements of this project plan are considered. Outside of the remit of climate change, there seems to be many gaps in the way in which environmental resources and biodiversity are covered and this could potentially lead to the failure of the process to significantly deliver on the region's commitments on biodiversity, including commitments to deliver PSA28 on securing a healthy natural environment for today and the future.

Specific comments

Is the timetable clear about what will happen when?

At stage 2 it is suggested that "thematic Boards and FSRs will be asked to provide their initial assessment of the evidence under each of the key lines of enquiry". Who will do this for those lines of enquiry which are not 'owned' by any thematic Board?

Does the timetable provide sufficient opportunity to contribute to, and comment on, the development of the IRS?

Two significant flaws with regard to Stage 1. Firstly that external consultation on this key element is restricted to eight working days, which is not sufficient for regional forums. Secondly, and perhaps more important, is the fact that this part of the IRS is being completed in the absence of an established Sustainable Development Board. For so long as this remains unresolved this inevitably undermines later stages of the process.

Stage 2 seems particularly crucial to setting the overall direction of IRS, addressing the region's Vision, and questions of 'what needs to be done' and 'how it can be done'. It is unclear what provision is being made at this point to bring in views from outside. If reliance is being placed wholly on thematic Boards and FSRs – then it is highly likely that environmental goals and environmentally-based solutions will be under-represented. This is exacerbated by the non-existence of the SD Board.

Stage 4 looks unfortunately timed. It is perhaps the most crucial stage of the IRS process but incorporates the summer holiday period when many external bodies will have reduced capacity, and the mid-financial year (end September) period when many organisations will be focussing on internal reviews etc. On the face of it extra time invested at this stage could reap significant time savings at Stages 7 (the EiP) and 8 (refinement and finalisation).

Are there any strategic issues you anticipated being included in the Key Lines of Enquiry that are missing?

Biodiversity, landscape, marine, green belt.

Otherwise some issues are addressed only in what might be termed their predictable silos, when we might expect that a wider consideration in other workstreams would be more likely to deliver sustainable economic growth within environmental limits.

Environmental Limits & Capacity; CCER

CC mitigation (incl. C storage); HR, ES, CCER, T,

CC adaptation; HR? CCER

biodiversity protection, opportunity, connectivity;

landscape;

Ecosystem services;

Minerals: SP

Green Infrastructure; SP

Food Security; CCER

Energy Security; SP (Renewables); CCER

Flood Risk & Water resource management; SP; CCER;

Interactions between lines of enquiry,

Health; QLE

role of green belt;

Tranquillity; QLE

Retrofitting: HR

Are the headline Key Lines of Enquiry, and the rationale for covering them, clear enough? Should any of them be expanded, further specified or merged?

Addressing these two questions together.

There are two basic ways in which the IRS can help create a region that exists within Environmental Limits. It can either reduce consumption of environmental resources or it can seek to invest in and expand environmental capacity. Each of the workstreams should be developing lines of enquiry which address these challenges (examples are given below). They should not be left exclusively to the CCER workstream or the integrated assessment process, as if so they will inevitably suffer from being marginalised.

The **Economy and Skills** work stream needs to expand its scope. At the moment, with the exception of the issue of CC, the KLEs only address the impacts of environmental pressures on economic opportunity (as reflected in the final bullet point). The Economy and Skills KLEs need to be asking how economic activity and investment can itself alleviate these pressures, for instance: deliver an expansion in environmental capacity (for example by contributing to green infrastructure, enhancing habitat connectivity, enhancing landscape character); reduce pressures on environmental resources/ecosystem services; widen its own energy base; create the high quality settings that are themselves drivers of economic growth; contribute to the goals of green belts.

Again the **Housing and Regeneration** work stream, fails to adequately address its own role in delivering Sustainable Economic Growth. Some issues are picked up, such as ‘quality places’ (incidentally thereby serving to underline its absence from the Economy and Skills workstream), ‘low carbon’, ‘addressing climate change’. But clearly if the IRS is to get to grips with Sustainable Economic Growth, then the scope/role of Housing and Regeneration in reducing demand for environmental resources (water, land, raw materials, fossil fuels); contributing to environmental goals (investing in enhanced green infrastructure; improving landscape quality; strengthening habitat connectivity), need to be explored.

The **Spatial Planning** workstream does address many more issues relevant to environmental capacity (E.g. water resource management, minerals provision, renewable energy etc.), but again the criticism is that in addressing questions such as “What type, location, quantity and quality of employment land and approach to town centres is needed for our future competitive and sustainable economy” – there is no explicit or implicit questioning of how this can be best delivered to respect environmental limits and expand capacity. The line of enquiry around waste infrastructure is better in this respect, but limits environmental considerations to “effects on climate” – what about biodiversity, landscape etc?

Only two significant criticisms of the **CCER workstream**. First is that it makes no specific mention of **biodiversity, landscape, green infrastructure**, or softer

ecosystem services such as quality of place or cultural values. More specifically, the workstream needs to consider the need to protect existing semi-natural habitats (particularly irreplaceable ones), restore those which have become degraded, improve habitat connectivity and shift to landscape scale thinking to help enable wildlife to adapt to the impact of climate change. Secondly, with respect to environmental limits the KLE limits itself to a consideration of how IRS can sustain growth within these, rather than asking how can IRS contribute to the expansion of environmental capacity.

Although CCER is intended to be a cross-cutting theme which impacts on each of the other workstreams, it should be explicit in each of the workstreams as to the likely impacts of these on carbon emissions and biodiversity.

The **transport** workstream can be criticised on similar grounds to ER, SP, HR etc.

With respect to the **Quality of Life and Equalities workstream**, the scope should be expanded to include 'environment', as environmental quality is deeply relevant to at least 5 of the KLEs. There should also be recognition of how natural greenspace contributes to people's quality of life, health and wellbeing.

The KLEs are in general pretty clear and specific; there are though a few examples of non-specific terminology, which will be interpreted differently by different audiences:

'resilience' – in terms of safeguarding the economy from future down turns.

'address climate change' – in the context of housing and regeneration.

'key physical assets' – in the context of Spatial Planning.

Do the key tasks identified for each group provide the correct focus for their work? Are there any significant tasks missing from the key tasks?

The Evidence Task & Finish Group looks fine although there may be an over-emphasis on "consistency across all thematic areas and spatial levels".

With respect to Integrated IRS Appraisal Task & Finish Group we would prefer to see the ultimate aim (last bullet point) as being "creating a strategy that delivers SEG within EL etc..." (see CLG/BIS guidance).

Consultation and Engagement Group looks fine.

Implementation and Delivery Group. This group's role seems rather vague. Perhaps they might be rephrased as: Establish where and why implementation is failing; can things be done differently to address this, or do we need to simply exclude some issues from IRS for which policy levers are ineffective. (the role about involving bodies in the plan making process looks like it should be delivered by the Consultation and Engagement group); propose how to involve individuals and

institutions in plan delivery; consider the timescales within which IRS should be delivered – are some policy areas time-focussed within the lifetime of the plan.

Monitoring and Evaluation Group looks fine.

Community Involvement

Finally, a few words about the range of stakeholders. Although it is positive that the role of the Regional Environment Forum has been recognised, it should be noted that in previous strategy consultations the Forum's constituent groups, including the non-governmental sector, have also contributed significantly to the evidence base and strategic development. It would be good to see a mechanism set up whereby these groups would be kept updated and have a route to influence the IRS.

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