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Royal Commission Study of Environmental Planning

A response by the Institution of Environmental Sciences

1. (a) The effects of the pursuit of sustainable development have generally been favourable, partly in focusing attention on important issues and partly in stimulating action to combat excesses or bad practice in the planning process. However, it is important to distinguish between 'sustainable development' and 'sustainability'. The latter requires a view in a wider context which includes the questioning of development per se rather than the mitigation of the effects of development (as an acceptable pre-requisite). There thus needs to be some shift in the policy approach to environmental planning (at all levels) and there are signs that this process is commencing.

(b) There are environmental imperatives, some of global importance such as climate change, others of more national significance such as waste disposal, agricultural and forestry policy relating to landscape and amenity and protection of natural habitats. All environmental planning should be related to these key issues the overall policies for which must be decided (and, where desirable, regulated) at national governmental level. Global issues will be further influenced by international debate and agreement, and trans-national issues (eg fishing) by trans-national negotiation.

(c) The present systems for regulatory control in environmental matters probably provides the right balance. Controls in the key areas of water, soil and air quality are largely EU driven and extensive. They are supplemented on a regular basis and include measures for integrated pollution control. It is unlikely that any more extensive or onerous control system could be effectively implemented.

Protection of landscape and amenity (which must also include species protection) is more difficult to legislate for. Opinions on key issues vary (eg the debate on GM crops and organic farming) and may well result in quite significant changes in policy from time to time. This requires a more flexible control system. Present arrangements for area designations are probably best for localised amenity protection though the system probably needs to be applied more dynamically. Farming (and forestry, with other related land use classifications) require nationally agreed policies dynamically applied through regional and local rural development policies.

(d)/(e) Current land use planning does still embody a presumption in favour of development and is also constrained by the limitations of geographical boundaries. The increasing emphasis on privately funded development in most sectors – housing, health, commerce, leisure – have largely moved planning regimes to a 'monitor and manage' role of direction rather than initiation. Unfortunately the resulting predominance of profit related development is not conducive to sustainability

objectives! We have thus created clear conflicts of interest, resolution of which poses a considerable problem. Far more prescriptive requirements on private development are needed based on carefully thought through environmental policies at local level.

2/3. The mismatch between administrative areas and environmental processes hinders effective and comprehensive planning. This is not a new problem but has existed in the planning system for decades. Early attempts by Government to resolve this problem saw the establishment of Regional Planning bodies and more recently a new pattern of Regional Committees has been set up.

The DETR and Environment Agency, who between them are responsible for the practical initiation and implementation of most environmental planning initiatives across the country as a whole, both have regional structures and developed regional contacts. A well organised and layered planning system, probably orchestrated by the DETR and establishing close communication between successive layers, should overcome the problem. Continuity of approach from national through regional, county and district levels down to local parish level is essential.

3. (a) (c) & 4. More importance should be given to practical and detailed input from local bodies at parish level where these relate to localised issues. Too frequently decisions are made at district council level which ignore local representation or feeling or which fail to take account of local knowledge.

Just as the planning control regime should be structured in layers or tiers, so the environmental planning and plans should be constructed in the same way. National policies are required for such issues as transport, energy, water supply, agriculture, pollution control, waste disposal, etc. These can then be interpreted on a regional basis (to reflect differences between requirements or characteristics in different parts of the country). Local decisions can then be made on the basis of better policy guidance and in the wider context as appropriate.

More use should be made in the planning system of environmental appraisals, both for ecological and amenity impact and for economic and sociological effect (i.e. sustainability). Development planning generally, both at county and district level, is still lacking in real environmental content.

5. Sustainability issues are now becoming of paramount importance and should be central to ALL development planning processes. All relevant forms of assessment methodology should be used including environmental sustainability, capital, footprint, space and health impact. Two significant areas commonly overlooked are the economic and sociological effects of development, most appraisals concentrating

on the physical effects. New approaches are needed in both areas as a part of cost benefit analysis techniques.

One drawback in the implementation of these approaches is a lack of information on the impacts of past development schemes – performance analysis is rarely carried out as a routine exercise and research projects after the event are expensive and time consuming. Examples of good practice are similarly lacking. The knowledge base on environmental and sustainability issues is very limited, including that of the very large number of professional and practitioners involved in both the planning and development processes. The deficiency has been recognised and efforts are being made to expand the training provisions for practitioners but the learning curve has a considerable time span. Feedback of performance data can only be achieved by a significant investment in research both of observed outcomes or of on-going situations. Few observable mechanisms exist for this at present.

A further drawback in the development of skills relates to the present situation in the job market. The rapid expansion in higher education courses in environmental subjects has failed to produce a corresponding provision of trained and experienced practitioners due to a much lower level of demand for their services. A very significant proportion of graduates from environmental courses fail to obtain employment and a career in the environmental field. This is a sad waste of resources and a hindrance to well implemented environmental programmes. A significant increase in investment in environmental consultancy, research and specialist training would go some way to redressing this deficiency.