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# Is localism delivering for climate change?

Emerging responses from local  
authorities, local enterprise  
partnerships and neighbourhood plans

# **Is localism delivering for climate change?**

## **Emerging responses from local authorities, local enterprise partnerships and neighbourhood plans**

by Faye Scott

### **Green Alliance**

Green Alliance is a charity and independent think tank focused on ambitious leadership for the environment. We have a track record of over 30 years, working with the most influential leaders from the NGO and business communities. Our work generates new thinking and dialogue, and has increased political action and support for environmental solutions in the UK.

36 Buckingham Palace Road, London, SW1W 0RE  
020 7233 7433  
ga@green-alliance.org.uk  
www.green-alliance.org.uk

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## Executive summary

The coalition agreement set out the government's localist intentions from day one when it stated that "The Government believes that it is time for a fundamental shift of power from Westminster to people. We will promote decentralisation and democratic engagement, and we will end the era of top-down government by giving new powers to local councils, communities, neighbourhoods and individuals."<sup>1</sup>

To this end many of the structures that shaped local authority activity have gone. The regional tier of government has been decisively swept away and many of the partnerships that tackle issues of local concern have changed significantly. The emphasis has been on freeing local authorities from central diktat and making them accountable to their citizens, alongside freeing communities to have more say in decisions that affect them.

These freedoms have come at the same time as radical budget cuts, leaving local authorities and communities with few resources to take advantage of them. And the freedom to determine priorities has come with very little clarity about the responsibilities that local areas should still have on issues of collective challenge, such as climate change.

### Climate change and localism

Local action remains central to tackling climate change. The Department of Energy and Climate Change (DECC) and the Local Government Group (LG Group) have jointly acknowledged that "policies set at a national level affect the ability of councils to act at a local level, and that local action affects the ability of national government to meet its targets."<sup>2</sup> The local level has a key role in helping to meet goals such as an 80 per cent reduction in emissions by 2050 and supplying 15 per cent of the UK's energy consumption from renewable energy by 2020. Local action also has a powerful role to play in engaging citizens and developing sustainable communities.

This makes climate change a unique challenge in the context of localism. Meeting national climate change targets relies on local action, but the government's localist agenda makes it reluctant to set targets. If we are to tackle climate change successfully it is essential that we understand the implications of localism for continued local action.

### Our research

We set out to answer some key questions: In the face of rapid, radical change are local authorities continuing to work on climate change and how is action being encouraged? Is the government's aspiration that a partnership approach will develop between the centre and the local realistic? And what potential do new avenues like local enterprise partnerships (LEPs), local nature partnerships (LNPs) and neighbourhood plans offer for strengthening local action on climate change?

We spoke to councillors, local authority officers, chief executives, civil society organisations, statutory bodies, central government departments, and representatives of LEPs, LNPs and neighbourhood plan 'front-runners'. We conducted a survey of local authorities on climate change and ran four focus groups to gather civil society views.

### Our findings

The survey revealed a three-way split between local authorities, which has been strongly borne out by interviews and wider research.

- 37 per cent are deprioritising climate change or state that it was never a priority. Starkly worded submissions such as, "the sustainability function within my local authority has been deleted and the climate change function has been discontinued" illustrate the scale of the loss in certain places.
- 35 per cent remain firm in their commitment to climate change and believe that action could even increase in the context of localism.
- 28 per cent are narrowing their ambitions to focus on reducing emissions from their estate and ceasing work on wider environmental issues.

Overall, the results suggest that climate change work has narrowed, is very weak or absent in 65 per cent of local authorities.

Local partnerships are clearly valued in tackling climate change but we found that many local authorities and civil society organisations are experiencing a partnership vacuum. Civil society perceptions that local authorities are turning inwards underline the evidence of local authorities narrowing their work on climate change to an internal focus or ceasing it altogether.

Responses to the question: “How (if at all) do you think the priority afforded to climate change by your local authority will change as a result of this new context?”:<sup>3</sup>

**“Barnsley’s work on climate change is now articulated in a way that makes the case for continued action even in tough economic times”**

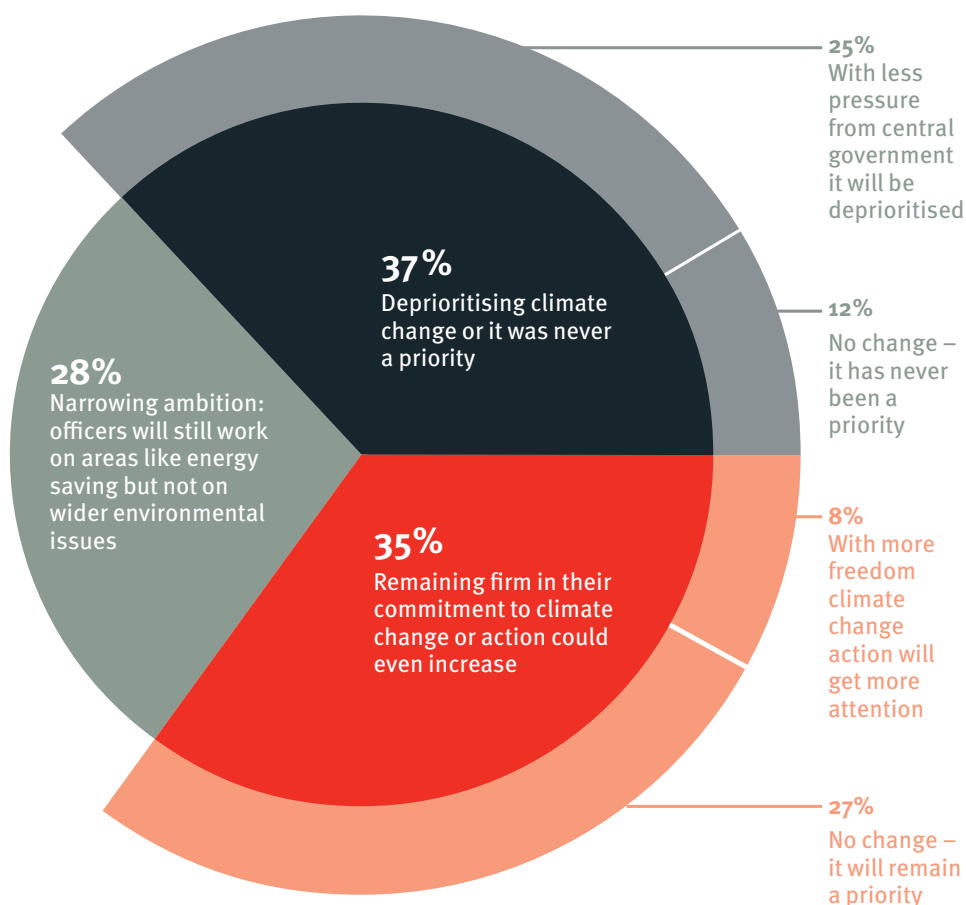
Local councillor

**“The post of corporate energy manager was created to reduce emissions from the local authority estate. An ex-member of the climate change team secured the post but it has no outward focus.”**

Local authority officer

**“Some services will be stopped completely, eg climate change work, work on renewable energy, natural environment policy and delivery.”**

Local authority officer



Finally, there was significant scepticism about the idea of citizens holding local authorities to account. Civil society organisations doubted whether the power dynamic can really shift and resources came up frequently. How can local citizens or civil society groups be expected to have the expert knowledge needed to assess data sets and decide whether progress is sufficient, assuming a local authority is still collecting data on the issues they care about.

**“Organisations I belong to do not have the time or expertise to hold local authorities to account. Local auditors, properly trained could make this ambition achievable. But I suspect this role will never be filled.”**

Civil society organisation

Taken together, these findings suggest that the foundations for a partnership approach to climate change are weak and raise serious questions about how the government’s localist approach can facilitate greater climate action.

### Encouraging local progress

Our evidence highlights the tension at the heart of the government’s approach to localism, which delegates new rights but not shared responsibilities. A range of measures aim to encourage and support local action on climate change but none of them are prescriptive. They include:

- **A revamped Nottingham Declaration**

This declaration provides a platform for local authorities and their partners to publicly declare their commitment to address climate change. Launched in 2000, it now has over 300 local authority signatories. The refreshed declaration will be “a mechanism for councils to demonstrate their commitment to continued action on climate change” and “enable them to sign up to locally appropriate targets and goals.”<sup>4</sup> Signing the new declaration will be voluntary and will enable benchmarking and the sharing of good practice.

- **Local carbon frameworks programme** This involved nine pilots and 30 local authorities. It explored how central government can support local authorities in optimising their carbon reduction strategies. Rather than informing a process of allocating local responsibility for emissions, as envisaged by the previous government when the programme was set up, the 43 projects will now be a “a portfolio of case studies”<sup>5</sup> for local authorities to draw on.

- **Revenue streams** Opportunities for local authorities to become Green Deal providers or to pursue revenue streams from renewables or decentralised energy are attractive in the current economic context. The government’s trailblazer scheme aims to demonstrate the Green Deal’s potential to local authorities and to resolve any obstacles they face in getting a scheme up and running. Local authorities that are already pushing ahead in these areas serve as useful exemplars.

- **The duty to cooperate** The localism bill will impose this duty on local authorities in the context of planning. They will have to collaborate around the strategic priorities set out in national planning guidance, one of which is to do with climate change. There is little clarity about what cooperation should entail or what its intended outcomes should be, so it is too early to tell what potential this offers as a platform for local authorities to work together effectively on climate change.

- **Permissive guidance on climate change**

Local authorities will receive this guidance from central government. Its scope is not yet clear but the emphasis will be on demonstrating to local authorities what they could do and how to go about it rather than telling them to act. It will be complemented by guidance to local authorities from the government’s Committee on Climate Change.

### **New foundations for partnership action on climate change**

Although older partnerships are falling away, a variety of new partnerships are in play at the local level and offer important new routes to strengthening local action on climate change.

#### **Local enterprise partnerships (LEPs)**

In contrast to regional development agencies (RDAs), which had clear responsibilities for regional action on climate change, LEPs bring local authority and private sector partners together with the exclusive aim of securing local growth. They have developed proposals for enterprise zones, which will benefit from business rate reductions and simplified planning to accelerate development. Thirty seven LEPs have been set up and 24 enterprise zones designated. LEP priorities and the focus of enterprise zones offer useful insight into their potential as routes to low carbon progress.

Twenty nine LEPs refer to the low carbon economy or climate change at some point in their top line information, with ten of them going into some detail (see table on p29). For example, setting emissions reduction targets or elaborating on how they plan to realise their low carbon ambitions. Among the enterprise zones, four have a very strong focus on renewable energy, for example the Humber enterprise zone is a renewable energy 'super cluster'. A further seven intend to attract low carbon businesses to their enterprise zones and three make some reference to ensuring that their developments will be sustainable.

LEPs are potentially useful new routes to low carbon progress. They can articulate and pursue the economic benefits of action, build wider business and local authority buy-in and bolster relevant work within their LEP boundaries. The challenges are ensuring that they are equipped with the resources they need to seize this opportunity and ensuring that low carbon ambitions are shared by all LEPs, not just in those that look likely to lead the field.

### **The low carbon potential of LEPs will only be realised if:**

- they are tasked with responsibility for acting on climate change and accounting for its impacts as they develop their plans for securing local growth;
- central government recognises their potential to help secure the transition to a low carbon economy and supports LEPs in building their:
  - knowledge of their locality's existing competitive advantages in clean technology;
  - understanding of environmental and low carbon markets and the policy drivers for pursuing low carbon infrastructure as a route to growth;
  - ability to address the financial needs of clean tech businesses and projects and to build the fragile supply chains needed to support them.

#### **Local nature partnerships (LNPs)**

LNPs were only announced in June 2011 and, as a result, have far less shape than LEPs. Their creation was informed by the idea that "effective action to benefit nature, people and the economy locally happens when the right people come together in partnership."<sup>6</sup> Suggested members include local authorities, local businesses, statutory authorities, civil society organisations and land managers. Defra's vision for LNPs includes them demonstrating leadership and raising awareness of the benefits of a healthy natural environment, contributing a natural environment perspective to local development plans and working to secure the benefits and services secured from the local natural environment. It is envisaged that around 50 will be set up.<sup>7</sup>



### For LNPs to be an assertive voice on local environmental and climate change issues they will need to:

- comprehensively assess climate change risks and avoid evolving too narrow a focus: conservation representation on LNPs should be balanced by broader environmental groups to enable this;
- influence LEP plans: their membership should be pitched at a level comparable with the seniority of LEP board members to facilitate reciprocal representation between LEPs and LNPs;
- influence the development of local strategic plans: to ensure they consider local natural environment and broader environmental challenges and facilitate the duty to cooperate on the natural environment and climate change;
- secure longer term support through innovative partnerships with local businesses and/or landowners.

As with LEPs, the key issue for LNPs will be resources. They are expected to become self-funding and have far fewer resources available to start them off than LEPs do. This will compound the challenges they face in becoming bodies with real influence on local development plans and LEP plans.

### Neighbourhood planning

Neighbourhood plans are billed as giving communities “direct power” to plan their neighbourhoods.<sup>8</sup> Once adopted, they will be statutory planning documents. We looked at the front runners to understand their potential as new avenues for local action on climate change, while being mindful of the active debate about whether they represent a genuine handing down of power.

Neighbourhood plans won't be required to look at environmental sustainability, as they have to comply with strategic local plans, which already cover sustainability. But only 30 per cent of local authorities have a local plan.<sup>9</sup> Without one, neighbourhoods will only have broad and high

level national policy to refer to. Translating that into something relevant at the local level will be a challenge. It will also miss the opportunity for neighbourhoods to pursue sustainability far more creatively than a local plan process.

Neighbourhoods can look at meeting local energy needs through renewable energy projects, pursue sustainability by setting high environmental standards for new development and facilitate low carbon transport. Communities will need support to identify and take advantage of these opportunities, adding to the already significant questions about where the funding and expertise needed for successful neighbourhood plans will come from. The government has created a £3.2 million fund to support communities developing neighbourhood plans but it will not stretch to providing specialist support on issues like climate change.

It is also unclear how ambitious neighbourhoods can be on issues like climate change. There is a clear steer that communities can promote more development than their local plan, but not whether they can be more ambitious in other areas. The front runners are therefore important test beds for pushing boundaries on climate change within a planning context that is shaped around delivering economic growth and development.

Underlying all this is the question of whether neighbourhoods will see sustainability as important. Emerging evidence from front runners suggests that they will. Many have a strong advocate for environmental issues involved and are developing energy and sustainability plans.



### For neighbourhood plans to strengthen local action on climate change:

- local authorities must provide a steer about the need for neighbourhood plans to consider environmental issues and the long term resilience of their community in the face of risks like climate change;
- neighbourhood plans must be allowed to set out greater ambition than their local plan on tackling climate change, reducing emissions and securing low carbon development;
- local environmental groups should get involved in neighbourhood plans;
- neighbourhood planning forums must have their needs for resources and expertise met, either through dedicated support or by drawing on existing resources.

### Risks and opportunities

Having examined the implications of localism some clear opportunities are evident, but they come with risks. These are set out below. There are new routes for strengthening local action on climate change, but they rely on volunteerism, are under resourced and lack some of the key skills needed to fulfil their potential on climate change.

### Opportunities for strengthening local action

- Local authorities and LEPs leading the way on climate change and low carbon opportunities prompt increased action by those with an interest and, potentially, even among the laggards, especially if they demonstrate the economic benefits of action.
- New local authority business models and revenue streams incentivise local authorities to pursue sustainable energy.
- LEPs and LNPs provide positive local reinforcement of the low carbon transition;
- Communities build sustainability into their neighbourhood plans and use them to achieve ambitious sustainability outcomes.

### Risks to local action

- The partnership approach on climate change fails: poor performance on climate change at the local level ultimately leads to greater central government intervention to secure the local action that is needed to meet national climate change objectives.
- New partnerships fail to achieve their climate change and low carbon ambitions, or to develop them in the first place, because they represent business as usual interests, don't stimulate new activity, or lack the expertise needed.
- Lack of resources discredits localism, undermining opportunities like LEPs, LNPs and neighbourhood plans and preventing their low carbon potential being realised.

### The way ahead

Progress on climate change has always varied at the local level, even when structures were in place to drive action. Recent changes have significantly eroded the foundations of action. But localism's freedom to do more and the new partnerships it has created are opportunities that should be capitalised on.

Lack of resources has the potential to scupper the low carbon potential of all the new partnerships we discuss. The government has clearly stated ambitions for the transition to a low carbon economy and a partnership approach to climate change. It needs to recognise the potential of LEPs and LNPs to help with both these goals, and support them in playing their part. Without this, LEPs with low carbon ambitions will be hard pressed to realise them and the chance that the issue will rise up the agenda in other LEPs is slim. A central unit that provides support to maximise the effectiveness of LEPs is urgently needed. LNPs too will need support from the centre if they are to play an influential local role.

Communities will need significant support in developing neighbourhood plans, especially if they are to make the most of opportunities for tackling climate change. Many local authorities will need encouragement to engage meaningfully with neighbourhood plans at all, let alone with their potential to tackle climate change. But they are an interesting new route. Approaches that aim to support local authorities in acting on climate change should highlight neighbourhood plan opportunities and share resources that will help communities and local authorities to include climate change in them.

Local authorities cannot be allowed to opt out of tackling climate change and LEPs should not be able to pursue their ambitions with no recourse to environmental impacts. By not requiring local authorities or LEPs to 'do their bit' on climate change the government has created a huge diversity of approaches. Some of these will be powerful. But as long as opting out is possible, climate change will not be tackled with the consistency and level of ambition that is needed if national targets are to be met.

We conclude that the government needs to be clearer that greater local freedom still entails shared responsibility on collective problems like climate change. This does not have to involve centrally imposed targets. It can be a process of setting out the collective challenge and leaving local areas to decide how to interpret and deliver against their responsibilities. Such an approach will still provide huge freedom and result in the diversity and creativity that localism should unlock. But it will remove the freedom to opt out and minimise the risk of greater central intervention further down the line. Green Alliance will be focusing on developing a workable approach to securing local action on climate change along these lines.

# 1. Introduction



## Localism coalition-style

Both the Conservative and Liberal Democrat parties nurtured ambitions to decentralise Britain while in opposition. Since taking power, the coalition government has been implementing radical change at a rate that has left local authorities, civil society, the policy community and citizens themselves hard pressed to keep up.

The coalition agreement set out the government's localist intentions: "The Government believes that it is time for a fundamental shift of power from Westminster to people. We will promote decentralisation and democratic engagement, and we will end the era of top-down government by giving new powers to local councils, communities, neighbourhoods and individuals."<sup>10</sup>

To this end, the regional tier of government has been swept away. Many of the structures that shaped local authority activity, the guidance that informed their decisions and the processes by which they were held to account have also gone. In their place is the simple encouragement that local authorities should do things their own way and look to their citizens, not the centre, for direction.

The focus has been on freedom. Freeing local authorities from central targets, reporting systems and red tape so that they can do what is best for their community; and freeing communities so that they can deliver services in the way they think best and have more say in decisions that affect them. But because the localism agenda has been twinned with radical budget cuts, these freedoms have come with very few resources to support local authorities and communities in taking advantage of them. And the freedom to determine priorities has come with very little clarity about the responsibilities that local areas should still have on collective challenges, such as climate change.

### Climate change: the case for local action

The UK's Climate Change Act of 2008 introduced a national carbon budget and committed the UK to reducing carbon by 80 per cent by 2050 and at least 34 per cent by 2020. Central government action is essential if we are to meet these targets, but so is local action. The Department of Energy and Climate Change (DECC) and the Local Government Group (LG Group) have jointly acknowledged that "policies set at a national level affect the ability of councils to act at a local level, and that local action affects the ability of national government to meet its targets."<sup>11</sup>

Local authorities not only have a responsibility to contribute to a shared effort to tackle climate change, but a powerful role to play. They can tackle their own emissions, improve the energy efficiency of local housing, promote low carbon development and transport through planning, and help to secure low carbon jobs and opportunities for their citizens and the local economy. They can develop adaptation plans to ensure that their communities and local environment are resilient in the face of climate change and engage their citizens in the benefits of sustainable lifestyle choices, supporting them with trusted advice and practical projects. They are essential partners in the local roll-out of national schemes, such as the smart meter roll-out or the Green Deal. And they can work with local civil society to protect the natural environment.

In short, local action on climate change is critical to meeting local challenges, engaging citizens and building resilience, as well as to our overall ability to make the transition to a low carbon economy and society. Which makes climate change a unique challenge in the context of localism. Meeting national climate change targets relies on local action, but the government's localist agenda makes it reluctant to demand action or to set local targets. If national climate change targets are to be met it is therefore essential that we understand the implications of localism for continued local action on climate change.

### The scope of this report

This report explores the impacts of the coalition's localism agenda on climate change action. In particular it asks:

- In the face of rapid, radical change are local authorities continuing to work on climate change or opting out?
- Are partnerships intact or changing?
- What potential do the proposed new approaches to encouraging and supporting local authority action on climate change offer?
- What potential do new avenues like local enterprise partnerships (LEPs), local nature partnerships (LNPs) and neighbourhood plans have to strengthen local action on climate change?

We spoke to councillors, local authority officers and chief executives, civil society organisations, statutory bodies, central government departments, and representatives of LEPs, LNPs and neighbourhood plan front-runners. In total, we conducted 51 interviews. We conducted a survey of local authorities on climate change, which received 126 responses, a survey for civil society groups on localism and climate change, which received 66 responses, and ran four civil focus groups in which a total of 95 people took part.

### Local government and climate change: context to date

The past decade has seen a growing recognition of the role that local authorities can and should play in tackling climate change, both through their own actions and in partnership with others. The Local Government Association (LGA) has played an important role in encouraging local authorities to see climate change as a relevant issue and has supported them in understanding how they can take action. Exemplar local authorities have emerged, demonstrating to their peers what is possible and the benefits of action.

**The Nottingham Declaration** was launched in 2000 and now has over 300 local authority signatories. It provides a platform for local authorities and their partners to publicly declare their commitment to addressing the causes and impacts of climate change. The commitments have more to do with good intentions than hard pledges but the declaration remains an important milestone. Local authorities acknowledged climate change as a shared challenge, which they have a key role in addressing. As we discuss in chapter 3, the LG Group hopes that a refreshed version will ensure that it has continued relevance in today's very different context.

**The national indicator (NI) set**, now consigned to history, also played an important role in securing more action on climate change. The 152 top tier local authorities had to report back to central government against 198 indicators, which included four with clear links to climate change. Authorities also had to select 35 indicators as priorities and agree the targets they would work towards with central government. These were set out in an authority's local area agreement (LAA). Many local authorities chose to include climate change indicators, with two thirds including NI 186 on reducing local per capita carbon emissions.<sup>12</sup> Ambition against the indicators may have varied greatly across local authorities, and NIs were by no means unproblematic. But they were of great value in providing committed officers and members with a firmer base from which to push for more progress.

National indicators also prompted an evolution in local authority and civil society partnership working on climate change. **Local Strategic Partnerships (LSPs)** already existed in many local authorities but had historically focused on renewal and regeneration. In 2004, LSPs were given responsibility for delivering against an authority's LAA. As a result, issues like climate change became an additional focus for local partnership working. Many LSPs set up environment theme groups, which became valuable new forums for joint discussions

between local authorities, statutory and civil society partners about how to tackle climate change at the local level.

More recently, two other initiatives have driven greater local action on climate change. In early 2010, the Labour government announced the creation of nine **Local Carbon Framework (LCF) pilots**, involving 30 local authorities in total. The programme acknowledged the willingness of local authorities to play their part in meeting climate change targets and aimed to explore how central government could better support local authority action on climate change and how responsibility could be allocated for emissions. We explore what is being done with their learning in chapter 3.

#### Local government and climate change in numbers

##### Obligations

###### 354

local authorities – 100% – have to report on emissions to DECC

###### 156

of England's local authorities – 44% – are subject to the carbon reduction commitment (CRC)<sup>13</sup>

##### Voluntary

###### 300+

local authorities – 90% – are signatories to the Nottingham Declaration<sup>14</sup>

###### 40

local authorities – 11% – have signed a Friends of the Earth petition calling for local carbon budgets to be introduced<sup>15</sup>

###### 100

top tier local authorities – 66% – had adopted NI 186 on reducing per capita emissions as a priority indicator<sup>16</sup>

##### Targets

###### 89

local authorities – 25% – have a target for reducing local emissions that goes beyond 2020<sup>17</sup>

###### 22

local authorities – 6% – have an emissions reduction target equivalent to a 40% reduction that by 2020<sup>18</sup>



The **Carbon Reduction Commitment (CRC)** has become a significant driver for local authorities in reducing the emissions from their own estate. Forty four per cent of local authorities are subject to it and required to report on their emissions and purchase allowances to cover them.<sup>19</sup> Even without the CRC, the financial incentives for reducing emissions have become much clearer for local authorities in the face of a recession and budget cuts. But many officers mentioned that reputational concern about their local authority's ranking in the CRC league table has motivated their management and leadership to push for more progress.

Finally, the abolished regional tier of government underpinned much local action on climate change. **Regional development agencies (RDAs)** had a clear focus on tackling climate change and supporting the transition to a low carbon economy. "Contributing to sustainable development" was one of their statutory objectives and the importance of regional action was made clearer still when DECC and the RDAs signed a partnership agreement in 2009.

The agreement set out the ways in which RDAs provide regional leadership on climate change, including developing low carbon regional economies, supporting the achievement of national climate change targets through regional action and building the markets, supply chains and skills bases needed to deliver low carbon energy.<sup>20</sup> It added to the momentum of regional climate change activities and many of the initiatives that local authority officers referred to in interviews had been funded by RDAs.

### Life under localism

Despite these drivers, progress across local authorities has never been consistent. Exemplars are well known, but many local authorities were still in the early stages of developing climate change strategies, and performance remained poor in some areas. As a result, many stakeholders concerned with tackling climate change responded to the localism agenda with more alarm than excitement in the first instance. Where local authorities have not made any meaningful progress in tackling climate change a localist approach might let them off the hook. And where work on climate change is still relatively new, the slackening of imperatives to work on it could be met with a degree of relief, causing fragile initiatives to lose momentum.

It was therefore significant that DECC and the LG Group proactively began exploring how local and central government could work together in meeting national climate change targets in a localist context. The LG Group's comprehensive *Offer on climate change* in July 2010 was a timely and important restatement of local government's critical role in tackling climate change and led to the production of a March 2011 *Memorandum of understanding (MOU)* between the LG Group and DECC.

The MOU was "created in acknowledgement of the pivotal role that councils have in tackling climate change". It sets out a partnership approach to meeting key climate change objectives, such as the 80 per cent reduction in emissions by 2050 set out in the Climate Change Act and the target to supply 15 per cent of the UK's energy consumption from renewable energy by 2020.

It commits DECC and the LG Group to working together to “help and encourage all councils to take firm action – underpinned by locally ambitious targets and indicators” to:

- reduce carbon emissions from their own estate and operations;
- reduce carbon emissions from homes, businesses and transport infrastructure, creating more appropriate renewable energy generation, using council influence and powers; and
- participate in national carbon reduction initiatives at the local level, particularly the roll-out of the Green Deal, smart metering and renewable energy deployment.<sup>21</sup>

Aside from setting out the intention to refresh the Nottingham Declaration (see chapter 3), the MOU does not include any real detail on how these aspirations will be met. Beyond the MOU there have been no indications of how local action on climate change will be supported and encouraged, let alone strengthened. Climate change and sustainability have been notable by their absence in announcements on local enterprise partnerships or neighbourhood plans, and debates about the impact of budget cuts have inevitably focused on more tangible losses like youth centres or libraries. Local nature partnerships have been announced but, at first glance, seem to be a rather hasty attempt to ensure that LEP growth agendas don't run roughshod over local environments. Planning reforms have thrown the environmental debate into relief, but it has been unhelpfully cast in opposition to growth, rather than as part of a positive discussion about how the planning system can deliver multiple objectives. Overall, there has been very little consideration of what localism means for action on climate change.

The landscape explored in this report is an uncertain one and many of the new entities that we spoke to are fast changing.

Localism is a work in progress and it is essential that tackling climate change is part of its progress. This report highlights the opportunities that localism presents to strengthen local action on climate change, but also the risks that need to be addressed if that potential is to be realised.



## 2. Narrowing local authority ambition



Local authority action on climate change is critical to building local resilience, as well as to our overall ability to make the transition to a low carbon economy and society. Central government and the LG Group acknowledged this in their *Memorandum of understanding* and hope that a partnership approach between the centre and local evolves. But the combined pressure of losing familiar structures and making choices between competing priorities has had unavoidable impacts on local authority commitment to climate change.

Our local authority survey on climate change indicates a three way split between local authorities, which has been strongly borne out by additional interviews and wider research.

- 37 per cent of local authorities are deprioritising climate change or state that it was never a priority. Starkly worded submissions such as, “the sustainability function within my local authority has been deleted and the climate change function has been discontinued” illustrate the scale of the loss in certain places.
- 35 per cent remain firm in their commitment to climate change and believe that action could even increase in the context of localism.
- 28 per cent are narrowing their ambitions to focus on reducing emissions from their estate and are ceasing work on wider environmental issues.

Overall, the results suggest that climate change work has narrowed, is very weak or absent in 65 per cent of local authorities. Below we explore the realities and implications of these numbers.

### Standing firm

With the majority of local authorities narrowing or deprioritising their work on climate change, examples of local authorities maintaining their ambitions in this area are encouraging.

With a committed Liberal Democrat leadership, Cambridge City Council continues to see climate change as central to what it does. It doesn't feel that central direction has ever driven its work, but welcomes the tools that central government can put in place to help Cambridge

City realise its ambitions, such as the renewable heat incentive and the Green Deal. It is making a £900,000 investment in reducing its environmental impact as a local authority because of the twin cost and carbon savings it can deliver. It works extensively with local civil society groups and its leader is incorporating her commitment and expertise on sustainability into her role as a board member on the Greater Cambridge Greater Peterborough enterprise partnership.

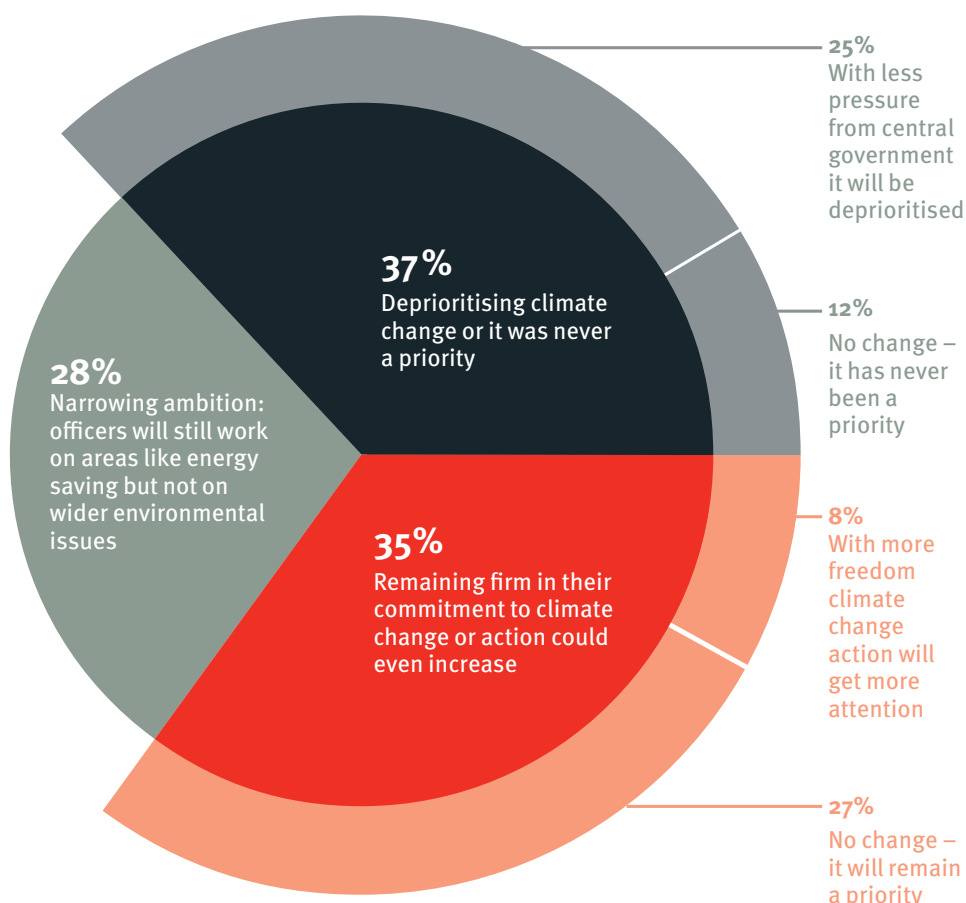
Barnsley Metropolitan Borough Council (MBC) recognised the need to reframe its climate change work in economic terms if it was to survive in straightened economic times. It has a

strong track record on climate change: retrofitting buildings to high sustainability specifications; working effectively with civil society; and integrating climate change and sustainability into projects. But the selling points for green projects have changed from reputational and practical to money-saving and investment in a growth sector. Its work on climate change is now articulated in a way that makes the case for continued action even in tough economic times, and climate change is one of the four key themes underpinning Barnsley MBC's overarching aim of growing the local economy.

### Narrowing ambition

Narrowing local authority ambition on climate change is reflected in the survey results and was continually reinforced across the majority of local authorities we spoke to.

**Responses to the question: “How (if at all) do you think the priority afforded to climate change by your local authority will change as a result of this new context?”:<sup>22</sup>**



Wider work with communities to engage them in reducing their impacts, or to work on adaptation and the natural environment, used to sit alongside efforts to tackle local authority emissions. But it was frequently referenced in interviews and survey responses as having been lost, as no longer being measured, as being significantly deprioritised or as at risk. In contrast, reducing emissions from their own estates remains a priority for many local authorities and was frequently cited as having grown in prominence. This shift is partly a result of the tough financial situation and increased interest in the cost savings that reduced emissions can deliver. Uniquely, it also still has reporting requirements. Local authorities have to report on their greenhouse gas emissions to DECC each year and 156 of England's local authorities, 44 per cent, are also subject to the CRC.<sup>23</sup>

Staff changes and restructuring illustrate the narrowing of focus. One local authority reported that "in the wake of cuts the post of corporate energy manager was created to reduce emissions from the local authority estate. An ex-member of the climate change team secured the post but it has no outward focus." Another officer talked about the broad climate change strategy she had been developing, which was ambitiously planning to tackle consumption based emissions. Finalising that is now on hold, as she has been asked to develop a corporate emissions reduction strategy.

Tackling local authority carbon emissions is an important activity. Many see it as essential to building legitimacy on climate change. And there were some examples where the potential to save money from reducing emissions had led to greater action. But most officers see an exclusive focus on carbon management as a disappointing retreat when set alongside the loss of broad programmes of sustainability work. In many cases, carbon management programmes are not steps forward, but simply what officers have managed to salvage from significant cuts to their activities.

If nothing else, the focus on financial savings can be used by officers to cement an understanding of the reinforcing benefits of cutting carbon and saving money among local authority managers and members. In the longer term, an appreciation of these links could help secure buy-in and investment for more ambitious climate change strategies. For many though, even this relatively straightforward case is a hard one to make. As one councillor reported, "my fellow members have no real recognition that taking environmental action can have economic benefits"

**"If an invest to save argument can be made for addressing climate change then things look more rosy, otherwise the council can hide behind not having the money."**

**"Hopefully climate change will not be deprioritised in the coming years in favour of carbon management alone."**

**"Fiscal austerity has focused the council's attention on carbon because of the links with saving money. Beforehand the focus was on the wider sustainability debates."**

**"There is no money saving potential, so adaptation work is out the window."**

Local authority officers

### Deleting the sustainability function

The vision of local authorities as partners in tackling climate change, each acting locally to address a national challenge, is a clear reality in some local authorities. But many are simply opting out of taking action on climate change.

The most totemic example of this can be found in Somerset County Council. In 2007 it made the historic decision to become a Transition Council, working very closely with transition town representatives to put ambitious plans in place. In contrast to that ambition, the revised medium term financial plan it adopted in early 2011 states that “some services will be stopped completely, eg climate change work, work on renewable energy, natural environment policy and delivery.”<sup>24</sup>

We found that 30 per cent of local authorities are deprioritising climate change. Numerous reports of posts or entire teams being cut, officers being urged to scale back activity, a loss of impetus and lack of confidence that climate change work will be taken forward sit behind that stark statistic. One county councillor painted an incredibly bleak picture of the situation in his local authority. The climate change team has been cut completely, the local authority’s strategic priorities did feature climate change but they have been superseded by budget priorities that do not. The codicil that requires the carbon impacts of any policy to be considered as part of the decision-making process has been deleted and decisions across policy areas are having adverse impacts on people’s ability to make low carbon choices.

In other local authorities we see councillors eagerly demonstrating their willingness to relax efforts to pursue sustainability objectives. Although somewhat contrite after his comments received national press coverage, the Fenland District Council leader’s comments about “relax(ing) conservation rules, particularly around sustainability” in order to be “practical” because “polar bears won’t be floating down the Nene in my lifetime”<sup>25</sup> are indications of the direction of travel in a significant number of

local authorities. Emboldened by localism’s promise of greater influence, many councillors are giving greater reign to such sceptical views.

### Tackling a collective challenge

Local authorities opting out of climate change will miss out on low carbon economic opportunities and undermine the shared effort that is needed to successfully mitigate and adapt to climate change. In failing to consider climate change impacts, they will be storing up problems for the longer term. Such a situation is anything but the partnership approach envisaged by DECC and the LG Group in their MOU.

Addressing issues of collective responsibility is a complex challenge. With a government that has made local freedom one of its headline offers, it is also an incredibly delicate one. They are resistant to the idea of telling local authorities to pull their weight.

The remainder of this report examines the different avenues that exist for supporting and encouraging action on climate change in a localist context. All of them will have the best chance of success if the local authorities involved are strong advocates for low carbon outcomes and are equipped with the resources needed to achieve them. So their potential must be assessed in light of evidence that the foundations of local authority action have weakened. Opportunities explored include the development of new frameworks for local authority action on climate change and new approaches and entities, like neighbourhood planning, LEPs and LNPs.

### An exemplar in detail

#### Tackling climate change in Manchester

In Manchester, nothing was safe when it came to budget cuts. But the council leader successfully argued that pursuing a low carbon vision will make the city more attractive to investors in future, help it to compete on the international stage and deliver social, economic and environmental benefits for residents. Its 'mini-Stern' report in 2008 identified a potential loss of £20 billion up until 2020 if it failed to prepare for climate change and the potential for action to support 68,000 jobs, generate £1.4 billion in economic activity and reduce CO<sub>2</sub> emissions by 6.1 million tonnes.<sup>26</sup>

In July 2011 the Greater Manchester Combined Authority (made up of the ten local authorities in greater Manchester) launched its ambitious climate change strategy. It commits the city to four key objectives to be achieved by 2020:

- rapid transition to a low carbon economy
- 48 per cent reduction in carbon emissions
- being prepared for and actively adapting to a rapidly changing climate
- 'carbon literacy' will have become embedded into the culture of organisations, lifestyles and behaviours<sup>27</sup>

The 48 per cent target is an ambitious one and a significant commitment by a local authority to push itself further than the national government commitment. The strategy also goes beyond emissions reductions to acknowledge the importance of adaptation, behaviour change among residents and the compelling economic case for the transition to a low carbon economy. In the longer term it aims to pioneer an understanding of how consumption based emissions can be accounted for and tackled.





### 3. The changing context of local authority action



If national climate change targets are to be met in a localist context, new freedoms must be matched with shared responsibility. At present, the government's approach to localism, coupled with budget cuts, has created a context in which the majority of local authorities are retreating to focus solely on their own emissions, or are significantly deprioritising climate change. Even though joint statements at the national level emphasise the important role of local authorities in tackling climate change, there are no strong mechanisms in place for securing their participation.

Perversely, despite the clear financial incentives to focus on local authority emissions, they are the only aspect of climate change activity that has retained central reporting requirements. Local authorities have to report annually to DECC on their emissions. But there is no sign that the process will involve any challenge to poorly performing local authorities and DECC acknowledges that direct comparisons between local authority emissions will not be possible, hampering the ability to share best practice. There is also no statutory requirement to report to DECC and the department states that the only

sanction for failing to do so "is likely to be reputational."<sup>28</sup> The 44 per cent of local authorities subject to the CRC have a heightened financial incentive for reducing emissions, as they have to purchase carbon allowances to cover their emissions in addition to paying their rising energy bills.

But, as set out in our introduction, local authorities can do so much more than reducing their own emissions. Top down targets are at odds with the government's localist vision, so we explore here what mechanisms are in place to encourage and support greater local authority action on climate change.

#### **Redirecting accountability**

Eric Pickles, secretary of state for communities and local government, has heralded a new era of accountability for local government. Instead of reporting back to central government against a list of top down targets, local authorities will be accountable to local people. As part of this drive, local authorities are encouraged to make as much of their performance data as possible accessible to citizens.

This has been hampered by the fact that many local authorities are abandoning measurement against the range of issues they are no longer required to report on. Local authority officers repeatedly expressed frustration that abandoned monitoring leaves them without a means to measure progress. More significantly, there was a lot of scepticism from civil society organisations about whether the power dynamic can really shift.

Resources came up frequently. How can local citizens or civil society groups be expected to have the expert knowledge needed to assess extensive data sets and form a view on whether progress is sufficient, especially on complex issues like climate change? And where data is no longer being collected, the idea of holding their local authority to account in a total vacuum of knowledge seems impossible.

### **A new Nottingham Declaration**

Perhaps foreseeing a gap in local action on climate change, the DECC/LG Group MOU set out the intention to “develop a mechanism for councils to demonstrate their commitment to continued action on climate change.” This will be in the form of a new Nottingham Declaration. To avoid any doubt that this will be centrally imposed it is also referred to as a sector-led approach to climate change.

This is part of an overall ‘self-regulation and improvement’ approach being developed by the LG Group.<sup>29</sup> Local authorities may have been happy to see the back of national indicators but many acknowledge the value of reporting frameworks and the ability to compare data and approaches with their peers. Setting out what a local authority plans to do in different areas and agreeing relevant targets is also central to accountability. In response to this feedback the LG Group is developing tools for local accountability across a range of issues. Climate change is currently leading the way due to the presence of an existing voluntary framework to build on.

**“What power do we have to hold local authorities to account? We can critique what they’re doing, but there is nothing in place to make them listen to what we’re saying. There’s a lot of complex data that needs to be collected and analysed and without targets a lot of this data will not be collected, so we won’t even know what’s going on. So I remain unconvinced about the effectiveness of local accountability.”**

Civil society organisation

**“Civil society groups have failed to date to hold the council to account re its climate change performance, so I don’t expect that to change. Arguably this reflects the electorate’s priorities, but also the capacity and skills of groups.”**

Local authority officer

**“If the community asks us to do something more and there isn’t any money for it then I just don’t see it happening.”**

Local authority officer

**“I don’t think the concept of civil society holding us to account will have much impact on our day to day activities.”**

Local authority officer



When it was launched in 2000, signing the Nottingham Declaration was an important first step for local authorities that signalled their willingness to work on climate change. Since then, local authorities leading on climate change have gone far beyond it in scope and ambition. Others have been able to point to the fact they've signed the declaration as evidence of their commitment without being challenged to do more.

The revamp pitches the absence of the old performance framework as an opportunity for local authorities to demonstrate that they recognise the importance of acting on climate change by setting "locally appropriate actions and targets."<sup>30</sup> A consultation is exploring the appetite for a voluntary process, the issues that local authorities would feel comfortable agreeing targets on and what benchmarking and opportunities to share good practice would be useful. The hope is that some signatories will go further faster and provide powerful examples of what can be achieved. The new declaration should be agreed and available for signing from November 2011.

### **Local carbon framework programme**

The learning from the Local Carbon Framework (LCF) pilots will be an important part of the support offered by the new Nottingham Declaration. The LCF programme had nine pilots involving 30 local authorities and aimed to:

- mainstream measures to combat climate change into the core business of local authorities;
- align carbon reduction to the growth of the green economy and public sector efficiency;
- optimise local authority contributions to the national carbon budget and secure local carbon accountability.<sup>31</sup>

The programme was set up under the previous government, but retained its funding under the new government, although it was reduced from two years to one. The original intention had been to better understand how government can allocate responsibility for emissions at the local level in a way that takes the particular context of a local authority into account, what spatial scale works best for targets and what a stretching target looks like.

In its original form, it may have led to a top down process of setting informed and nuanced local targets for tackling emissions. That would be against the grain of the coalition's localism, so the programme's focus became one of exploring how central government can support local authorities in optimising their carbon reduction strategies. Chris Huhne, DECC's secretary of state, describes the results of the programme and its 43 projects as "a portfolio of case studies" from which "any local authority can begin to plan how it can optimise its contribution."<sup>32</sup>

This portfolio will be shared as widely as possible with local authorities and will be valuable material. But a programme with the vital aim of better understanding how we can develop locally appropriate targets that help to meet shared challenges has been reduced to guidance.

### **Duty to cooperate**

RDAs and the regional spatial strategies that they developed were a valuable means of developing a shared, strategic approach to tackling climate change at the regional level. With RDAs now abolished, many stakeholders are concerned about how 'larger than local' issues like climate change will be effectively addressed. The duty to cooperate, which the draft localism bill places on local authorities, is an effort to address this. The duty will see local authorities "work together on planning issues in ways that reflect genuine shared interests and opportunities to make common cause."<sup>33</sup> The draft national planning policy framework (NPPF) sets out the strategic priorities that a local plan should cover

and indicates that they expect local authorities to work collaboratively on them. One of the strategic priorities is: “climate change mitigation and adaptation, protection and enhancement of the natural and historic environment, including landscape, and where relevant coastal management.”<sup>34</sup>

This is a useful prompt to local authorities to work collaboratively on tackling climate change. But it is too early to say how effective an avenue it will be for securing meaningful action. There is little clarity on what the expected outcomes of cooperation are or what it should entail. Efforts will vary considerably and could range from a simple exchange of information to the development of shared evidence bases, joint monitoring and the preparation of joint plans. The delivery of low carbon energy infrastructure will also depend on cross-boundary working, but it is not yet being actively promoted as a useful area for local authority cooperation.

As the localism bill has not yet become law there are no practical examples of the duty to cooperate to examine. But we highlight it here as a means through which local authorities could be encouraged to develop shared approaches to tackling climate change in the context of their development documents. Where local authorities have different levels of commitment this could be a useful route for those making more progress to encourage their neighbours to go further.

### **Revenue streams from tackling climate change**

Local authorities leading the field in climate change are increasingly driven by an economic imperative that's stronger than their environmental motives. Practical approaches to tackling climate change can offer job creation and financial benefits, which progressive local authorities like Manchester or Birmingham have been taking advantage of.

In the current economic context, opportunities for local authorities to become Green Deal

providers or to pursue revenue streams from renewables or decentralised energy are attractive. The feed-in tariff (FiT) offers a return for local authorities that invest in the provision of renewable energy on their own estate and more widely. Similarly, the renewable heat incentive (RHI) and its precursor, the renewable heat payment (RHP), will incentivise renewable heat installation and can also provide an income stream.

The barrier to local authorities taking up such opportunities continues to be the upfront investment needed. The government encourages local authorities to seek part of the cost from energy companies, who can contribute as a way of meeting the various energy reduction obligations they face. But they do acknowledge that a funding gap is still likely and suggest that it could be filled from reserves, prudential borrowing or private investment. Where a local authority can see the long term economic benefits, and is committed to meeting ambitious climate change objectives, then the borrowing can be justified on the basis of projected future income, potential job creation and support for local business. But many local authorities will see it as too big a commitment to take on in the face of budgetary pressures across the board.

The government is hoping that local authorities leading the way will demonstrate the “vast potential” of the Green Deal. Although it is not yet set out in legislation, the government announced that Greater Manchester will be testing Green Deal implementation by retrofitting 2,500 properties.<sup>35</sup> This will help to identify any obstacles that local authorities face in getting a scheme up and running, provide insight into how local authorities can borrow against the future income they can recoup from incentives like the RHI, and increase understanding of the economic stimulus and level of job creation that the Green Deal offers a local area. Other local authorities are being encouraged to join Manchester and become Green Deal ‘trailblazers’.

Birmingham City Council has announced its intention to become the first local authority Green Deal provider, and tendered for a delivery partner in July 2011. The Birmingham Energy Savers programme is already a highly regarded model for local authority delivery of energy efficiency and microgeneration through loans and in partnership with energy companies and banks. This model will be refined so that it includes all measures covered by the Green Deal, as well as continuing to offer measures that will be funded by income from the FiT. In total, up to £1.3 billion could get spent on retrofitting 200,000 homes by 2026. Birmingham Energy Savers also aims to create 270 jobs and make a key contribution to Birmingham City Council's aim of reducing emissions by 60 per cent by 2026.<sup>36</sup>

### Will more be needed?

Sustainable energy opportunities with revenue streams, twinned with the supportive and hopefully stretching framework of the Nottingham Declaration are two important avenues for securing continued local action on climate change. But neither are a certainty. Sustainable energy projects require significant commitment, vision and leadership, and the declaration will be voluntary, with no guarantee that it will help local authorities set ambitious goals. Both are powerless in the face of authorities that are opting out on climate change.

Such variety and uncertainty comes with the territory of localism and government officials are realistic that the package of measures on offer will only attract and support the progressive and the willing. The government has stated that centrally imposed emissions targets "would place significant new burdens on local authorities contrary to the government's policy of removing burdens and top down targets."<sup>37</sup> But climate change presents it with a unique challenge, as local freedom abuts national commitments that rely on local action.

Discussion in government of the tensions inherent in securing local action on climate change has led to the idea of 'permissive

guidance' on climate change and cutting carbon emissions that will go to local authorities. The scope of such guidance is not yet clear, but the firm message is that it will not tell local authorities what to do, it will set out what they can do and how to go about it. This will be complemented by guidance for local authorities from the Climate Change Commission, which will feed in to the permissive guidance.<sup>38</sup>

This approach acknowledges that a localist context presents challenges for collective issues like climate change. The guidance, however permissive, will be a clear message from the centre to the local that will underpin the measures discussed above. But the challenge of how to engage local authorities that are opting out remains unaddressed. Ultimately, a more significant intervention may be required.

Developing a solution that goes with the grain of localism but sees all local authorities taking responsibility on climate change will only be possible if there is a negotiated agreement between the centre and the local that sets out shared responsibilities. Green Alliance will be working on what this could like.

**"Localism is a good thing but local authorities should still be given clear direction from central government. Climate change is regarded as one of the biggest threats to society and it is a national problem, so we need more direction from central government to ensure we meet climate change targets."**

Local authority officer

## Local partnerships old and new

What do they offer  
for progress on  
climate change?

## 4. The loosening of old ties



**“We have climate change action plans for all local authorities in the region, which are the result of effective collaboration between local authorities.”**

Local authority officer

**“Local authorities deliver many services that have a direct link with climate change. So it’s crucial that we work together to get sustainable outcomes.”**

Civil society organisation

Partnerships at the local level have been central to progress on climate change. They have enabled local authorities to benefit from each other’s best practice, expertise and capacity, achieving more together than they would alone. They have also been an important opportunity for civil society to challenge local authorities to go further, to benefit from a local authority’s knowledge base and resources, and for both parties to gain new support in delivering their ambitions.

Despite the clear value placed on them, partnerships are being lost or are breaking apart around the country. Local authority officers repeatedly highlighted the challenges of maintaining action without them, and civil society organisations are feeling cut adrift from opportunities to work with their local authorities. Taken together, this constitutes a significant erosion of local capacity on climate change.

### **Evolving relationships**

Partnership approaches to climate change have often been driven by a collective effort to deliver progress against climate change national



indicators (NIs), especially those set out as priorities in the local area agreement (LAA). Local authorities worked together, and partnerships with civil society tended to sit within local strategic partnerships (LSP).

Partnerships have always varied significantly in the level and quality of progress that they delivered. Civil society organisations are trusted and essential partners in tackling climate change in some local authorities, while officers in others acknowledge that their civil society engagement has always been poor and will not get any better in the current context. But with LAAs and NIs now abolished, the drivers for maintaining LSPs and other partnerships are gone, prompting one local authority chief executive to say that “their days are numbered.”

An LG Group briefing on partnerships reports that many are refocusing on the delivery of best value, joint strategic commissioning and service

redesign. There are moves in some local authorities to create area or neighbourhood based partnerships that will bring decision-making closer to communities, in line with the localism agenda.<sup>39</sup> New partnerships like LEPs are also getting a lot of attention, as we explore in the next chapter.

But when it comes to climate change, many local authorities and civil society organisations are experiencing a partnership vacuum. Civil society perceptions that their local authorities are turning inwards clearly matches the evidence of local authorities narrowing their work on climate change to an internal focus on reducing emissions, or ceasing it altogether.

Civil society views	Local authority views
<p>“There is a real weakening of partnership structures. The county level community partnership is being changed beyond recognition and funding for district level partnerships has decreased. So it’s less clear where civil society can fit in and have an influence.”</p> <p>“The local authority is turning more inward, previous partnership arrangements like LSPs and the associated housing, transport and environment groups are loosening and drifting.”</p> <p>“A lot of partnerships that were in place to progress environmental policy decisions are no longer in place, so there is no arena to explore these issues in, and membership is falling off from the few partnerships still remaining.”</p> <p>“The LSP is winding down. Many of the meetings I previously attended and got useful information from are not happening anymore. There was a great deal of work on the city’s climate change action plan, but it has been harder to keep this collaboration going.”</p>	<p>“Since the removal of NIs and the loss of climate change staff in some member local authorities, the meetings of our district and borough partnership group on climate change have been disbanded until further notice.”</p> <p>“Until last year we were working with the county and the other districts on climate change actions. This has now ceased due to financial cutbacks and the removal of NIs.”</p> <p>“We work with the boroughs and districts on a range of NI indicators, but the incentive to do so is declining with their demise.”</p> <p>“Until April 2011 the county council led the five districts strongly on climate change. However, budget cuts, redundancies and changes of priorities have led to climate change becoming a lower priority for many of the districts and especially the county council. Prior to that we had a lot of shared working and best practice via bi-monthly meetings.”</p> <p>“Our outreach and community liaison resources are being phased out.”</p> <p>“While localism allows more flexibility it also removes the focus for local authorities and partners, so it may be more difficult to get multi-agency commitments in future.”</p>

### **The challenge ahead**

Many officers are making valiant efforts to maintain their ties with civil society groups even though they have no formal or financial means of doing so. But the risks of partnership approaches to climate change being lost without anything viable taking their place are real and damaging, particularly in the shorter term. They raise serious questions about how the government's localist approach can facilitate greater climate action, if the very mechanisms for strengthening such efforts are being lost.

New approaches to partnership do not evolve quickly. Resources are a constraint and relationships of trust and effective ways of working are developed over time. The patterns of partnership are also changing, with more of a focus on public-private partnerships centred around the growth agenda, or neighbourhood level approaches. With partnerships so evidently central to strong and successful local action on climate change and a number of new entities on the scene, we turn now to examining what potential they offer for strengthening local action on climate change.

**“We are working as creatively as we can with our local communities with fresh air as our only resource. The only thing we can really do though is join groups up.”**

Local authority officer

**“I have no budget for outreach, but at the very least I can continue doing the photocopying for the groups I used to support, especially as they act as valuable communication outlets for council messages.”**

Local authority officer



## 5. New foundations for partnership action



The impact of losing partnerships is contributing to the evident loss of local momentum on climate change in many local authorities. But partnership is still very much in fashion, just in different guises. Local enterprise partnerships (LEPs) featured in the coalition government's plans right from the start. The intention to support them was set out in the May 2010 coalition agreement along with the clear expectation that they operate as jointly led business and local authority partnerships. The intention to support local nature partnerships (LNPs) was set out in the June 2011 natural environment white paper.<sup>40</sup>

### Local Enterprise Partnerships

LEPs were created to deliver local economic growth and to speed up economic recovery. They bring together local business and local authorities in partnership and are expected to "provide the clear vision and strategic leadership needed to drive sustainable private-sector led job creation and growth in their area."<sup>41</sup>

Their creation was linked with the abolition of the regional tier of government, which the

coalition saw as lacking in democratic accountability, responsible for duplication and unrepresentative of "functional economic areas."<sup>42</sup> In contrast, LEPs are expected to reflect more "natural" economic areas.<sup>43</sup> The timescale for their development was very rapid and, for many, their first task was drafting ambitious enterprise zone bids in an effort to secure the simplified planning and business rate discounts that such a designation offers.

Thirty seven LEPs have now been agreed, covering 97 per cent of local authorities.<sup>44</sup> They are evolving fast and many have announced their boards and set out their visions and priorities. As entities tasked with delivering local growth in order to ensure national economic recovery, will they also offer new opportunities for acting locally to tackle the national challenge of climate change?

### An enterprising approach to climate change?

In contrast to the RDA's agreed focus on developing low carbon, energy efficient regional economies and helping to address national climate change targets, LEPs have only been tasked with a focus on growth. This

inevitably raised concern that their attitudes to considering climate change or natural environment impacts will be lax.

The government's June 2010 letter to local authority and business leaders, which invited them to form LEPs, mentioned the transition to a low carbon economy as an issue that LEPs may want to tackle.<sup>45</sup> Chris Huhne, DECC secretary of state, followed this up with a letter to all local authority leaders and chief executives in August 2010. He stressed the "vast potential" that local authorities have to drive the green agenda and noted that he is "particularly keen to see how these partnerships [LEPs] could help capitalise on the business opportunities from low carbon energy and energy efficiency."<sup>46</sup> Beyond that, LEPs have received no steers that they need to focus on climate change and the enterprise zone application process did not require proposals to indicate the environmental or climate change impacts of their plans.

In an effort to understand the degree to which environmental considerations are informing LEP plans, we have surveyed their proposals and websites. Given the focus of LEPs, the most relevant and frequent references are to the low carbon economy, rather than to climate change. But 29 out of 37 LEPs refer to it at some point in the top line information on their websites or in their proposal. Such references are absent in eight of the LEPs.

There is noticeable variation among the 29 LEPs that do make reference to low carbon. In a number of cases, the phrase 'transition to the low carbon economy' seems to be thrown in for good measure. For example, 'securing the transition to a low carbon economy' might be tacked on to the end of a detailed list of objectives with no additional material or evidence that its local relevance or achievability has been thought through in depth. But ten LEPs have made references or commitments worth noting. These are set out in the table below.

#### LEP references to climate change and/or the low carbon economy:

LEP	Their plans and climate change
<b>Dorset</b> 9 local authorities	<ul style="list-style-type: none"> <li>• Their 'green knowledge economy' model takes an integrated approach to the economy and the environment and provides the LEP with an "inspirational and coherent focus for investment of resources and alignment of effort"</li> <li>• One of their 5 performance indicators is a 30 per cent reduction in CO<sub>2</sub> emissions by 2020, relative to 2005</li> <li>• They aim to maximise the economic potential of offshore renewables<sup>47</sup></li> </ul>
<b>Swindon and Wiltshire</b> 2 local authorities	<p>Their nine 2015 objectives include:</p> <ul style="list-style-type: none"> <li>• Reduction of CO<sub>2</sub> Emissions per capita, as they note that Swindon currently has the 6<sup>th</sup> highest rate in the UK on the city's index</li> <li>• Sustainable transport for rural communities, noting that 66 per cent of the LEP population live within 5km kilometres of a railway station</li> <li>• They also list low carbon renewable energy as a business strength<sup>48</sup></li> </ul>
<b>Cheshire and Warrington (C&amp;W)</b> 3 local authorities	<ul style="list-style-type: none"> <li>• Their proposal has a dedicated section on the low carbon challenge, which notes that C&amp;W's footprint is too high, but that they have exemplars like the village of Ashton Hayes in their area. They commit to monitoring achievement against the local climate change action plan and encouraging the adoption of new technologies to help businesses and individuals adapt their behaviours.</li> <li>• Reducing carbon emissions is one of their 11 principles</li> <li>• One of their 5 principal functions is: "promoting and supporting the transition to a low carbon economy, assisting businesses to reduce their costs, take advantage of new commercial opportunities and adapt to climate change"<sup>49</sup></li> </ul>

<b>South East Midlands</b> 12 local authorities	<ul style="list-style-type: none"> <li>• Part of the partnership's "transformational role" will be: encouraging cross-boundary green infrastructure development, climate change adaptation, carbon reductions and health and well being</li> <li>• Supporting the transition to a low carbon economy is one of 7 key activities</li> <li>• Their proposal also has a dedicated section on the transition to a low carbon economy, which is "particularly important as climate change will impact on essential locally delivered services including transport, hospitals, water and energy." The LEP commits to: <ul style="list-style-type: none"> <li>• agreeing common environmental standards in planning, aspiring to build on the best local practice and support local development frameworks;</li> <li>• encouraging locally-owned 'green business plans' that offer a better environment, jobs and sustainable enterprises;</li> <li>• extending and rolling-out the existing low emission vehicles programme;</li> <li>• promoting a low carbon living programme to promote health and well being, economic uplift and biodiversity, and cutting CO2 emissions;</li> <li>• using Eco Bicester (a designated national eco town) as a focus for testing the transition to low carbon living.<sup>50</sup></li> </ul> </li> </ul>
<b>Sheffield City Region</b> 7 local authorities	<ul style="list-style-type: none"> <li>• Their vision includes the ambition to give the nation its "prime centre for advanced manufacturing and materials, and low carbon industries"</li> <li>• One of the 8 themes of their proposal states that "addressing the need to provide a sustainable economy is essential to overcome the negative consequences of growth as we strive to create cleaner energy generation in the face of inflated fuel prices, reduce waste and greenhouse gas emission, and increase recycling through the better management of resources"</li> <li>• Their aim is for the city to become more energy self-sufficient and they see the LEP having a key role in energy master planning for the city region. This will help reduce the cost and carbon footprint of industry, shops, offices and homes and contribute to the national shift to a low carbon economy<sup>51</sup></li> </ul>
<b>Leicester and Leicestershire</b> 9 local authorities	<ul style="list-style-type: none"> <li>• Their 5 point vision includes the intention to: plan for a low carbon economy where jobs and homes are aligned; where there is a balanced supply of housing, employment land and premises, infrastructure, housing and skills; with businesses operating in low energy buildings, greater local sourcing of products and services; and people able to travel to work by sustainable modes of transport</li> <li>• One of their 7 objectives is: "promote sustainable communities and environmental sustainability"<sup>52</sup></li> </ul>
<b>Greater Birmingham and Solihull</b> 9 local authorities	<ul style="list-style-type: none"> <li>• They will take a lead in low carbon R&amp;D and environmental technologies and services</li> <li>• One of the 7 things they aim to "make easy" is delivering the green new deal, which will "build on the area's pioneering national investment in low carbon infrastructure by developing a low carbon, energy efficient economy through 'green' technologies, job and entrepreneurial opportunities"<sup>53</sup></li> </ul>
<b>Cornwall and Isles of Scilly</b> 2 local authorities	<ul style="list-style-type: none"> <li>• They identify the low carbon sector as one of 7 key areas to develop "building on the fact that our area is at the forefront of the implementation of marine, solar and geothermal renewable energy. Examples are the development of Wavehub, the Peninsula Research Institute for Marine and Renewable Energy (PRIMARE) and the Environmental Sustainability Institute (ESI)." They also hope to work closely with the West of England LEP as it has expertise in tidal power</li> <li>• As they will be unique in having wave, solar, wind and geothermal applications they aim to develop exemplar projects that will contribute to the wider UK economy<sup>54</sup></li> </ul>

<b>London</b> 33 local authorities	<ul style="list-style-type: none"> <li>• The proposal mentions the Mayor's target to reduce CO<sub>2</sub> emissions by 60 per cent by 2025 and the aim of "positioning London as a leading low carbon capital for the provision of finance, business services and innovation within the low carbon economy"<sup>55</sup></li> </ul>
<b>Greater Lincolnshire</b> 10 local authorities	<ul style="list-style-type: none"> <li>• One of their 3 priority areas includes the need to make the county more resilient in the face of the challenges from climate change<sup>56</sup></li> <li>• They see a competitive advantage in marine energy</li> <li>• They note that their agricultural strength offers an opportunity for the sector to work together to reduce the industry's carbon footprint across the supply chain<sup>57</sup></li> </ul>

Board members committed to action will also be important to strengthening a LEP's consideration of climate change. The Greater Manchester LEP board includes Peter Marks, chief executive of the Co-operative Group, the Cornwall and Isles of Scilly LEP has a board member from the Eden Project and the Stoke-on-Trent and Staffordshire LEP includes an ecotourism consultant. Committed local authority representatives will be equally valuable. The Greater Cambridge Greater Peterborough LEP will benefit from having Councillor Sian Reid, Liberal Democrat leader of Cambridge City Council, on their board, and the Greater Lincolnshire LEP has an Environment Agency representative. Board members of this type, that bring strong environmental awareness

and commitment from their own organisations, have a vital role in keeping such issues front of mind among their fellow board members.

The enterprise zone proposals put forward by LEPs are another useful way of gaining insight into the spread of low carbon ambition. Twenty four zones have been designated and over half of them have some mention of low carbon or sustainability. Among them:

- 4 focus entirely or have a very strong focus on renewable energy;
- 7 mention their intention to attract low carbon businesses to their enterprise zone;
- 3 make some reference to ensuring that the zone's development will be sustainable.

### Renewable energy enterprise zones:

<b>Humber renewable energy supercluster</b>	<p>This enterprise zone is the largest to be announced. It aims to attract manufacturers of renewable energy equipment which should, in turn, attract their supply chains to nearby sites. This will lead to "development of a renewable energy super cluster unique in the UK and with international scale."</p> <p>Humber's advantages for the renewable energy sector include port and transport infrastructure, relevant skills and experience sites big enough for the assembly of large structures, such as wind turbines and the shortest sailing time to the east coast offshore wind sites.<sup>58</sup></p> <p>The zone is expected to create 4,850 jobs by 2015.<sup>59</sup></p>
<b>North Eastern low carbon enterprise zone</b>	<p>This zone is expected to create 1,000 jobs by 2015 and aims to make the north east a major global player in renewable industries and technologies. It will include electric vehicles and offshore wind and the emerging market for low carbon research and development, manufacturing, installation and maintenance of low carbon technologies.<sup>60</sup></p>
<b>Tees Valley enterprise zone</b>	<p>26 per cent of the new businesses and 55 per cent of the new jobs created by this enterprise zone will be in renewable energy.<sup>61</sup></p>
<b>New Anglia enterprise zone</b>	<p>This zone will be supporting the North Sea energy sector and will include a focus on offshore wind.<sup>62</sup></p>

In the absence of steers on climate change, it is positive to see that some LEPs were motivated to develop relevant commitments or performance indicators. As local businesses and authorities came together to develop LEP proposals there will have been a lot of competing interests at play. To see climate change featured in some proposals suggests that it is of tangible enough local concern or has local business leader and/or local authority buy-in to action.

With over half the successful enterprise zones focusing on the environment in some way, they also offer a valuable route for accelerating the growth of low carbon business. As with local authorities pursuing the Green Deal, the motivation in these cases is clearly economic, but it is valuable to see the economic benefits of low carbon business being recognised and pursued.

In most cases these will not be brand new ambitions. Many enterprise zone proposals packaged up existing local ambitions, rather than starting from scratch. In the Humber and in Cumbria, for example, there are well established partnerships that aim to attract renewable and low carbon energy business to the area. LEPs and enterprise zones became natural vehicles for progressing those ambitions, especially in the absence of RDAs, which were key partners beforehand. Existing initiatives with broad ambitions and economic potential are a natural fit for LEPs. They are far less likely to focus on supporting the very small-scale businesses that are essential to the low carbon transition, eg the plumbers and builders that will be retrofitting homes and currently depend on very fragile supply chains which need to be strengthened.

Enterprise zones have also thrown up some potential tensions for LEPs with low carbon ambitions. In Cornwall and the Isles of Scilly, for example, they prominently feature low carbon in their LEP proposal and have a board member from the Eden Project. But their successful enterprise zone bid centres on the development of Newquay airport. In Manchester, their

ambitious climate change strategy sits alongside enterprise zone plans to build a 'mini-city' at Manchester airport that can compete with airports like Amsterdam and can build a network of direct air routes, along with leisure and office provision and an expanded world freight terminal.<sup>63</sup> With the potential for ambitions to clash in this way, enterprise zone bids should have been asked to set out their projected environmental impacts so that different priorities could have been considered, balanced and mitigated where necessary.

### Ability to deliver

Whatever benefits or tensions they create, enterprise zones are one-offs. Ultimately, the spread and quality of low carbon progress over time will depend on LEPs. They have the potential to be important new routes to low carbon progress. They can provide local climate action with a valuable economic framing, identify and pursue tangible benefits of action, build wider business and local authority buy-in and bolster relevant work within their LEP boundaries. The question is whether they will be able to realise this potential.

The issue of capacity and resources has real potential to undermine them. RDAs were working to secure economic growth with teams of experts and significant resources, as well as using a formal partnership approach that ensured low carbon progress and climate change featured in their plans. LEPs are lacking in expert input and resources to sustain their activity.

The intention is for them to become self funding over time. At the moment they have access to a £5 million start-up fund in 2011-12, to support LEPs in getting core operational capacity in place, and a £4 million capacity fund available over four years, to support LEPs in understanding the issues facing their area and to develop action plans.<sup>64</sup> Spread between 37 LEPs this does not go far, particularly when it comes to exploring the local potential of specific sectors in detail, such as low carbon.

### The low carbon potential of LEPs will only be realised if:

- they are tasked with responsibility for acting on climate change and accounting for its impacts as they develop their plans for securing local growth;
- central government recognises their potential to help secure the transition to a low carbon economy and supports LEPs in building their:
  - knowledge of their locality's existing competitive advantages in clean tech;
  - understanding of environmental and low carbon markets and the policy drivers for pursuing low carbon infrastructure as a route to growth;
  - ability to address the financial needs of clean tech businesses and projects and to build the fragile supply chains needed to support them.

Without this, even LEPs with low carbon ambitions will find it hard to realise them and such ambitions are unlikely to rise up the priority list of LEPs across the board.

### Local Nature Partnerships

In contrast to the surge of activity around LEPs, LNPs have had less attention and were only announced in June 2011. With many partnership approaches to the environment loosening, LNPs are the clearest new opportunity for addressing environmental issues at the local level.

As with LEPs, partnership is central. The Department for Environment, Food and Rural Affairs (Defra) states that “effective action to benefit nature, people and the economy locally happens when the right people come together in partnership.”<sup>65</sup> They invited proposals for LNPs from around the country and envisage 50 being set up. The tight timescale for accessing support funding has created the risk that proposed LNPs will just be rebadged existing partnerships, instead of the broader and more creative approaches to delivering local

environmental progress that were hoped for. The creation of a second round deadline to access support has helped to mitigate this risk, but timing remains a factor in their likely influence and effectiveness.

Suggested members include local authorities, local businesses, statutory authorities, civil society organisations, land managers and community groups. Defra's vision for LNPs includes them demonstrating leadership and raising awareness of the benefits of a healthy natural environment; contributing a natural environment perspective to local development plans and working to secure the benefits and services secured from the local natural environment.<sup>66</sup> They also specify that they expect LEPs and LNPs “to work in a cooperative and constructive fashion to drive forward green growth locally”, recognising that local enterprise can “benefit from and contribute to a better natural environment.”<sup>67</sup>

No guidance has been given on what LNP boundaries should be but three models are emerging. The most popular is LNPs based on administrative boundaries at the county or strategic level. Other emerging ones are based on a landscape scale, such as a river catchment area, and a few are matching the boundaries of their local LEP.

Natural environment stakeholders have expressed various hopes about how LNPs will take shape and would like their activities to include:

- establishing a vision for their area's natural environment;
- embedding landscape scale thinking in local development documents;
- identifying local priorities for action, for example through opportunity maps or green infrastructure maps;
- identifying how those priorities can be secured or better reflected through local policy, with innovative new partnerships emerging to work on different aspects;
- an integrated approach to environmental, social and economic land functions, based on wise use of assets, goods and services.



Many see LNPs as an evolution of biodiversity partnerships and action plans (BAPs). To date, they have been the main forums through which local natural environment objectives have been pursued. But the system had become overly bureaucratic and there was a sense of fatigue in many BAPs, coupled more recently with serious cuts in central funding and support. LNPs come at a time when there is a desire to challenge the way that natural environment objectives are pursued locally, to re-examine their scope and make-up and to overcome the rigidity that prevented many BAPs working together effectively. The focus of LNPs will clearly be on natural environment objectives, but there is scope for them to pick up some of the broader environmental work of dissolving local strategic partnerships.

### **Harnessing LNP opportunities**

As with LEPs, resources will inevitably be a challenge for LNPs. Embryonic LNPs are either being initiated by local authorities, or civil society groups are turning to the local authority for support in the form of officer time. The intention is for them to become self-sustaining, with a £1 million fund available to start them off on a secure footing. But given that the £8 million available to 37 LEPs is heavily oversubscribed, it is hard to see how £1 million will be sufficient in helping 50 LNPs establish themselves on a sustainable footing capable of significant local influence in the long term.

### **For LNPs to be an assertive voice on local environmental and climate change issues they will need to:**

- comprehensively assess climate change risks and avoid evolving too narrow a focus: conservation representation on LNPs should be balanced by broader environmental groups to enable this;
- influence LEP plans: their membership should be pitched at a level comparable with the seniority of LEP board members to facilitate reciprocal representation between LEPs and LNPs;
- influence the development of local strategic plans: to ensure they consider local natural

environment and broader environmental challenges and facilitate the duty to cooperate on the natural environment and climate change;

- secure longer term support through innovative partnerships with local businesses and/or landowners, for example, a local environmental group, the Environment Agency and the local water company working together on water quality and wetland restoration.

### **Partnerships as the route to progress?**

Partnerships are central to the government's localism agenda. This creates a range of new routes for local responses to climate change, some of which are promising. But they are all under resourced and lack some of the key skills needed to fulfil or to develop climate change ambitions. This is the logical consequence of the government's approach to localism and its cuts to local funding. It is too early to know whether the gains made by the most committed will outweigh the losses of those who are dragging their heels on climate activity. This will become evident as LEPs and LNPs evolve and interact. But their potential to strengthen local action on climate change will remain in question as long as the serious resource challenges they face, in terms of finances and expertise, remain unaddressed.



## 6. Localism at the neighbourhood level



Neighbourhood plans that give communities “direct power” are one of the key offerings of the 2010 draft localism bill.<sup>68</sup> Parish councils or neighbourhood forums can develop plans that indicate “where they think new houses, businesses and shops should go – and what they think they should look like.”<sup>69</sup> Communities can also create neighbourhood development orders which define types of development that get automatic planning permission.

The plans must have regard to national planning policy and conform with strategic local plans, for example a local development framework (LDF) or a core strategy. An independent examiner will assess whether a neighbourhood plan meets these conditions and residents then vote on it in a local referendum. If 50 per cent or more of those that vote support the plan it will be adopted. Following adoption, the plans become statutory documents to be taken into account in planning decisions.

Even as their workability was interrogated by bill committees and experts, progress was quickly made on setting up 17 neighbourhood

planning front runners to test the concept. Each received a cash injection of £20,000 to get them moving. Further ‘waves’ of front runners have since been announced and there are now a total of 126.

### Real influence?

Neighbourhood plans have been the subject of extensive debate, with questions about resources, capacity, expertise and representation looming large. The question of their likely influence has become uppermost, as the growth agenda shaping the new national planning policy framework (NPPF) has become more apparent. The draft NPPF states that neighbourhood plans will be able to “shape and direct development in their area, subject to the presumption in favour of sustainable development.”<sup>70</sup> Communities may want to use neighbourhood plans to require higher sustainability standards in new development, to protect important green spaces or to limit the size or nature of development, all of which may be at odds with the government’s expressed desire for the default answer to development to be “yes”.<sup>71</sup> So the promise of greater decision-

making power has started to seem empty, rather than a ground breaking new opportunity.

The concept of business led neighbourhood plans has also undermined enthusiasm. They were announced in May 2011 with the statement that “the ambitions of local people and their local firms and shops are often one and the same and much needed growth can be achieved quicker by using the expertise and resources of local business people to spearhead the right development swiftly.”<sup>72</sup> Many civil society groups would agree that local businesses and communities share aims and have welcomed neighbourhood plans as an opportunity to consider their community’s economic, social and environmental priorities alongside each other. The perception that one set of interests has now been prioritised above others risks interest groups entrenching themselves in opposition rather than working collaboratively.

**“Residents have felt forced into opposition and we’ve been told that we are against jobs and progress. Our neighbourhood plan is a great opportunity to identify what we do want and to develop a positive, resilient vision for our area.”**  
Balsall Heath front runner representative

Despite these concerns, the most striking thing about neighbourhood plan front runners is their optimism. The groups involved see neighbourhood plans as a welcome opportunity to develop a positive vision for their neighbourhood that moves them away from an oppositional role in planning. Rather than having to respond to specific applications, neighbourhood plans allow for a broader conversation about the kind of development a community feels would improve their area and how sites can be used for mutual commercial and community benefit.

Those involved are aware of the limits to what they can influence. But they are also acutely aware of small alterations that would make their neighbourhood a better place to live, which they now have the opportunity to address. For example, the placement of street furniture, or decisions about where footpaths run through a park. More broadly, the front runners see scope to protect the character of their local high streets and to influence decisions about sites within their boundaries that are designated for development. They are quick to point out that they want growth as much as their local authority does and are open to development but seek decisions that work better from a neighbourhood perspective.

### Sustainability

Our focus has been the degree to which neighbourhood plans can be new avenues for local action on climate change. When a diverse group of residents come together to plan for the future of their area, will ambitions to improve their local environment, to mitigate and adapt to climate change and to push boundaries on the sustainability of local housing and facilities feature in their plans in the face of other pressing concerns?

Neighbourhood plan front runners are in their early stages, but evidence suggests that sustainability will feature. Many of them have a strong advocate for environmental issues involved and some feel that communities are likely to produce a greener plan than a local authority would. In Balsall Heath, Birmingham, the neighbourhood plan is being used as an opportunity to think about how they can meet more of their energy needs within their neighbourhood. Balsall Heath Is Our Planet is represented in the neighbourhood plan process and lends it an environmental perspective. Environmental groups in other areas should make a similar effort to be part of any neighbourhood plan opportunities.

Neighbourhood plans are not required to look at environmental sustainability and will receive no steer that they should do so. The government

argues that sustainability will be accounted for because neighbourhood plans must comply with local plans, which will set out strategic priorities on climate change and protection of the natural environment. But only 30 per cent of local authorities have a local plan.<sup>73</sup> In the absence of such a document, the proposed NPPF is the only thing that neighbourhood plans will have to reference. Its statements are inevitably high level, which leaves a significant gap between the granular detail of developing a neighbourhood plan and the broad guidance available for shaping it.

Leaving sustainability to local plans will also miss the opportunity for communities to be far more creative and ambitious than a local authority or local plan might be.

Neighbourhoods can look at meeting local energy needs through renewable energy projects, pursue sustainability by setting higher environmental standards for new development, facilitate low carbon transport and become exemplars that demonstrate what is possible at the very local level.

Communities have been given a clear message that they can promote more development than is set out in their local plan. It is important that they can also go further than their local plan in other areas that matter to them, such as sustainability. The front runners are useful test beds for seeing how community ambitions on climate change can be maximised within a potentially constraining local development context that is wholly shaped around delivering economic growth and development.

The fact that Natural England and the Environment Agency are sitting on the government's neighbourhood planning steering group is a welcome sign of proactive efforts to ensure that the environmental opportunities of neighbourhood planning are identified and pursued. But such bodies are partly there for statutory reasons and are very sensitive about any action by the centre that could be perceived as too directive.

## Resources

The issues of resources and capacity are unavoidable caveats to front runner optimism. Communities will need significant expertise to engage with the planning system and to develop a holistic neighbourhood plan. And they will need additional expertise to identify opportunities related to sustainability or climate change. This expertise won't be on tap in every community and, even where it is, not everyone will have the time to get involved.

Civil society groups made this point strongly in our Kent and Manchester focus groups. They highlighted the technical planning expertise, legal support, issue specific expertise and professional facilitation that will be needed to ensure an open and inclusive process and to effectively resolve the inevitable disputes that will arise.

**“It’s a big ask. Developing a neighbourhood plan will demand a lot of civil society groups and volunteers and are they then expected to sustain that over time and to monitor the plan’s implementation?”**  
Kent civil society group

The government has acknowledged this to a degree and created a £3.2 million fund to support communities developing neighbourhood plans. But this will not stretch far, especially if the take up of neighbourhood plans is as high as the government hopes. Much of the money is being spent on general awareness raising and will make little contribution to the practical support communities will need when they embark on a neighbourhood planning process. Communities will also need the resources to build evidence bases on key issues to inform their plan making.





The issue of financial cost is even harder to ignore. The front runners are depending heavily on volunteers, and many local authorities see the £20,000 that front runners received as necessary to cover their costs in supporting neighbourhood plans and running the associated referendum. With no funding on offer for subsequent neighbourhood plans there are real question marks about how they will be developed.

One way around these challenges is for local authorities to re-imagine their planning departments, putting their staff time and expertise at the disposal of communities and assisting them in developing neighbourhood plans. Forward thinking local authorities may do so and some already are. But concerns about resources, lack of staff capacity to work effectively with communities or a simple lack of buy-in to such a different approach will hold many back.

**“You need a local authority that accepts that their planners are essentially working for the community when developing a neighbourhood plan, sharing their time and expertise without being the ones in charge.”**  
Bermondsey neighbourhood forum representative

**“This approach shouldn’t be a luxury – it’s what localism is about, putting planners back in the community where they can work with residents to bring about positive changes for the future.”**  
Local authority officer

### Neighbourhood action on climate change

It is too early to tell what real potential neighbourhood plans offer climate change. It should feature in a process that's looking at the future of a community and evidence suggests that it will come up in neighbourhood plan processes. But dedicated support or guidance will be essential to maximising the potential for neighbourhood plans to initiate new local conversations about sustainability.

### For neighbourhood plans to strengthen local action on climate change:

- local authorities must provide a steer about the need for neighbourhood plans to consider environmental issues and the long term resilience of their community in the face of risks like climate change;
- neighbourhood plans must be allowed to set out greater ambition on tackling climate change, reducing emissions and securing low carbon development than their local plan does;
- local environmental groups should get involved in neighbourhood plans;
- neighbourhood planning forums must have their needs for resources and expertise met, either through dedicated support or by drawing on existing resources.

The strength of neighbourhood plans in the face of competing priorities and their ability to shape the neighbourhoods that communities want will be the true test of localism. Some feel that this battle has already been lost because of other interests being favoured or lack of resources. But the optimism that still exists at the local level is important. In the face of very valid concerns and doubts, neighbourhood plans still have the potential to be new routes to strengthening local action on climate change.

**“This process is definitely an enrichment of civil society engagement in the area that addresses our consultation deficit.”**  
Bermondsey neighbourhood forum representative

### A neighbourhood plan front runner Bermondsey, London

Bermondsey community groups welcomed neighbourhood plans as an opportunity to create a positive vision for their area and address a consultation deficit. They pushed for a community-led process and existing groups overcame differences to form a representative neighbourhood forum, providing an insight into how they will emerge in other urban areas.

The forum hopes to create a vision, a development control and a detailed delivery document that pushes boundaries, creates affordable homes, influences the nature of their high street and protects local businesses. They plan to work with developers to secure more meaningful consultation and to ensure that plans work for the community. There are environmental advocates involved in the forum and their views are widely supported. The forum feels they are likely to go further than their local authority would but acknowledge that they may not identify all sustainable opportunities without expert support.

Their challenges are getting and keeping people engaged and finding the necessary time, money and expertise. Bermondsey has many professional people involved, but they are not necessarily planning experts, and the time they spend on the process is traded with their leisure time. They have few retirees that could fill support roles and are starting their plan from scratch. The neighbourhood forum lobbied hard to secure £18,000 to spend on support costs and professional facilitation out of the £20,000 that Southwark council received as a front runner. Even so, the costs will be hard to cover.



## 7. Can localism deliver?



Localism offers clear opportunities for tackling climate change. It has created new avenues through which climate change and low carbon objectives can be pursued, new partnerships that bring different perspectives together and greater freedom, which should allow for more creative and ambitious approaches to sustainability. But our evidence highlights the risks of these opportunities not being realised. They rely on volunteerism, allow for opting out, are under resourced and lack some of the key skills needed to fulfil their potential on climate change. Overall, we have identified the following opportunities and risks that localism presents to strengthening local action on climate change.

### Opportunities for strengthening local action

- Local authorities and LEPs leading the way on climate change and low carbon opportunities prompt increased action by those with an interest and, potentially, even among the laggards, especially if they demonstrate the economic benefits of action.
- New local authority business models and revenue streams incentivise local authorities to pursue sustainable energy.
- LEPs and LNPs provide positive local reinforcement of the low carbon transition.
- Communities build sustainability into their neighbourhood plans and use them to achieve ambitious sustainability outcomes.

### Risks to local action

- The partnership approach on climate change fails: poor performance on climate change at the local level ultimately leads to greater central government intervention to secure the local action that is needed to meet national climate change objectives.
- New partnerships fail to achieve their climate change and low carbon ambitions, or to develop them in the first place, because they represent business as usual interests, don't stimulate new activity, or lack the expertise needed.
- Lack of resources discredits localism, undermining opportunities like LEPs, LNPs and neighbourhood plans and preventing their low carbon potential being realised.



### The way ahead

Progress on climate change has always varied at the local level, even when structures were in place to drive action. Recent changes have significantly eroded the foundations of that action. But localism's opportunities should be capitalised on.

Lack of resources has the potential to scupper the low carbon potential of all the new partnerships we have discussed in this report. The government has clearly stated ambitions for the transition to a low carbon economy and a partnership approach to climate change. They need to recognise the potential of LEPs and LNPs to help with both these goals, and support them in playing their part. Without this, LEPs with low carbon ambitions will be hard pressed to realise them and the chance that the issue will rise up the agenda in other LEPs is slim. A central unit that provides support to maximise the effectiveness of LEPs is urgently needed. LNPs too will need support from the centre if they are to play an influential local role.

Communities will need significant support in developing neighbourhood plans, especially if they are to make the most of opportunities for tackling climate change. Many local authorities will need encouragement to engage meaningfully with neighbourhood plans at all, let alone with their potential to tackle climate change. Approaches that aim to encourage and support local authorities to act on climate change should highlight neighbourhood plan opportunities and share resources that will help communities and local authorities to include climate change in them.

Local authorities cannot be allowed to opt out of tackling climate change and LEPs should not be able to pursue their ambitions with no recourse to environmental impacts. By not requiring local authorities or LEPs to 'do their bit' on climate change the government has created a huge diversity of approaches. Some of these will be powerful. But as long as opting out is possible, climate change will not be tackled with the consistency and level of ambition that is needed if national targets are to be met. As the impacts of differential effort become clear over time the pressure for stronger action from the centre will increase, potentially forcing the government into a response wholly at odds with its localist ambitions.

We conclude that the government needs to be clearer that greater local freedom still entails shared responsibility on collective problems like climate change. This does not have to involve centrally imposed targets. It can be a process of setting out the collective challenge and leaving local areas to decide how to interpret and deliver against their responsibilities. Such an approach will still provide huge freedom and result in the diversity and creativity that localism should unlock. But it will remove the freedom to opt out and minimise the risk of greater central intervention further down the line. Green Alliance will be focusing on developing a workable approach to securing local action on climate change along these lines.

## Notes and references

- 1 HM Government, May 2011, *The coalition - our programme for government*
- 2 Department of Energy and Climate Change and the Local Government Group, 9 March 2011, *Memorandum of understanding between the LG Group and the Department of Energy and Climate Change*
- 3 Out of the 126 responses to the survey, 67 responded to this question. 12 respondents were from county councils, two from a metropolitan, 1 from a unitary, 41 from borough or district councils, 9 from town or parish councils, 1 from a membership body covering 22 local authorities (this was only recorded as a single response) and 1 anonymous response. Responses were collected between 6 May and 24 June 2011
- 4 Department of Energy and Climate Change and the Local Government Group, 9 March 2011, *Memorandum of understanding between the LG Group and the Department of Energy and Climate Change*
- 5 2 August 2011 letter from the Rt Hon Chris Huhne MP, Secretary of State for Energy and Climate Change to Andy Atkins, chief executive of Friends of the Earth [www.foe.co.uk/resource/briefing\\_notes/huhne\\_petition\\_response.pdf](http://www.foe.co.uk/resource/briefing_notes/huhne_petition_response.pdf)
- 6 HM Government, June 2011, *The natural choice: securing the value of nature*
- 7 Department for Environment, Food and Rural Affairs webpage on Local Nature Partnerships [www.defra.gov.uk/environment/natural/whitepaper/local-nature-partnerships](http://www.defra.gov.uk/environment/natural/whitepaper/local-nature-partnerships) last viewed and updated on 26 September 2011
- 8 Department for Communities and Local Government, July 2011, *Draft National Planning Policy Framework*
- 9 Department for Communities and Local Government, August 2011, *Database on Local Development Frameworks: closure report – end December 2010*
- 10 HM Government, May 2011, *The coalition - our programme for government*
- 11 Department of Energy and Climate Change and the Local Government Group, 9 March 2011, *Memorandum of understanding between the LG Group and the Department of Energy and Climate Change*
- 12 Wade J and Jones E, 2010, *Local area agreements: progress towards local leadership on climate change mitigation*, Impetus Consulting
- 13 Out of a total of 354 English local authorities, 156 are registered participants in the CRC scheme (full participant list available from [www.environment-agency.gov.uk/business/topics/pollution/127775.aspx](http://www.environment-agency.gov.uk/business/topics/pollution/127775.aspx))
- 14 The Local Government Group in partnership with the Nottingham Declaration Partnership, 5 August 2011, *A new sector-led approach to tackling climate change – consultation on the Nottingham Declaration*
- 15 Friends of the Earth, March 2011, Local Government offer on climate change to Secretary of State for Energy and Climate Change Rt Hon Chris Huhne MP, letter signed by representatives of 40 local authorities [www.foe.co.uk/resource/briefings/council\\_offer\\_government.pdf](http://www.foe.co.uk/resource/briefings/council_offer_government.pdf)
- 16 Wade J and Jones E, 2010, *Local area agreements: progress towards local leadership on climate change mitigation*, Impetus Consulting
- 17 Friends of the Earth, April 2011, *Survey of carbon reduction targets of councils in England*
- 18 Ibid.
- 19 Out of a total of 354 English local authorities, 156 are registered participants in the CRC scheme (full participant list available from [www.environment-agency.gov.uk/business/topics/pollution/127775.aspx](http://www.environment-agency.gov.uk/business/topics/pollution/127775.aspx))
- 20 Department of Energy and Climate Change and England's Regional Development Agencies, 1 July 2009, *Strategic Partnership Agreement between the Department of Energy and Climate Change and England's Regional Development Agencies*
- 21 Department of Energy and Climate Change and the Local Government Group, 9 March 2011, *Memorandum of understanding between the LG Group and the Department of Energy and Climate Change*
- 22 Out of the 126 responses to the survey, 67 responded to this question. 12 respondents were from county councils, two from a metropolitan, 1 from a unitary authority, 41 from borough or district councils, 9 from town or parish councils, 1 from a membership body covering 22 local authorities (this was only recorded as a single response) and 1 anonymous response. Responses were collected between 6 May and 24 June 2011
- 23 Out of a total of 354 English local authorities, 156 are registered participants in the CRC scheme (full participant list available from [www.environment-agency.gov.uk/business/topics/pollution/127775.aspx](http://www.environment-agency.gov.uk/business/topics/pollution/127775.aspx))
- 24 The 16 February meeting of Somerset County Council resolved to approve the proposed savings identified in the medium term financial plan. Full details and papers from these meetings can be accessed via the Council's website [www1.somerset.gov.uk/council/board1/2011%20February%2016%20Item%205%20Council%20Minutes.pdf](http://www1.somerset.gov.uk/council/board1/2011%20February%2016%20Item%205%20Council%20Minutes.pdf)
- 25 Quoted from a speech given by Alan Melton, leader of Fenland District Council, on 22 June at the *Cambs Times/Wisbech Standard*/Fenland District Council Building and Design Awards
- 26 The Association of Greater Manchester Authorities, 22 August 2011, *The Greater Manchester climate strategy 2011-2020*
- 27 Ibid.
- 28 Department of Energy and Climate Change, *Sharing information on greenhouse gas emissions from council own estate and operations: Frequently asked questions*
- 29 LG Group webpage [www.local.gov.uk/taking-the-lead](http://www.local.gov.uk/taking-the-lead) last viewed 26 September 2011
- 30 Department of Energy and Climate Change and the Local Government Group, 9 March 2011, *Memorandum of understanding between the LG Group and the Department of Energy and Climate Change*
- 31 Department of Energy and climate change webpage [www.decc.gov.uk/en/content/cms/tackling/saving\\_energy/what\\_doing/local\\_councils/carbon\\_frames/carbon\\_frames.aspx](http://www.decc.gov.uk/en/content/cms/tackling/saving_energy/what_doing/local_councils/carbon_frames/carbon_frames.aspx) last viewed 26 September 2011
- 32 2 August 2011 letter from the Rt Hon Chris Huhne MP, Secretary of State for Energy and Climate Change to Andy Atkins, chief executive of Friends of the Earth [www.foe.co.uk/resource/briefing\\_notes/huhne\\_petition\\_response.pdf](http://www.foe.co.uk/resource/briefing_notes/huhne_petition_response.pdf)
- 33 Department for Communities and Local Government, June 2011, *A plain English guide to the localism bill*
- 34 Department for Communities and Local Government, July 2011, *Draft National Planning Policy Framework*
- 35 Department for Communities and Local Government, 9 March 2011, Rt Hon Grant Shapps MP: 'Manchester to kickstart green homes revolution' press release

- 36 *Green Deal guide*, 6 July 2011, 'Birmingham to become first Local Authority Green Deal provider' [www.greendealguide.co.uk](http://www.greendealguide.co.uk) Birmingham Energy Savers [www.birminghamenergysavers.org.uk](http://www.birminghamenergysavers.org.uk) and Birmingham City Council [www.birmingham.gov.uk/sustainability](http://www.birmingham.gov.uk/sustainability) all were last viewed on 27 September 2011
- 37 2 August 2011 letter from the Rt Hon Chris Huhne MP, Secretary of State for Energy and Climate Change to Andy Atkins, chief executive of Friends of the Earth [www.foe.co.uk/resource/briefing\\_notes/huhne\\_petition\\_response.pdf](http://www.foe.co.uk/resource/briefing_notes/huhne_petition_response.pdf)
- 38 *Hansard* House of Commons debate, 14 September 2011, column 1124
- 39 Local Government Improvement and Development, October 2010, *Reshaping the partnership landscape – briefing note 1*
- 40 HM Government, June 2011, *The natural choice: securing the value of nature*
- 41 HM Government, 28 October 2010, *Local growth: realising every place's potential*
- 42 Ibid.
- 43 Department for Business Innovation and skills [www.bis.gov.uk/policies/economic-development/leps](http://www.bis.gov.uk/policies/economic-development/leps)
- 44 Department for Business Innovation and skills [www.bis.gov.uk/policies/economic-development/leps/statistics](http://www.bis.gov.uk/policies/economic-development/leps/statistics), last viewed 27 September 2011
- 45 29 June 2010 letter from the Rt Hon Vince Cable MP, Secretary of State for Business, Innovation and Skills and the Rt Hon Eric Pickles MP, Secretary of State for Communities and Local Government to all local authority leaders, business leaders and local authority chief executives on the creation of Local Enterprise Partnerships [www.bis.gov.uk/assets/biscore/economic-development/docs/10-1026-final-letter-local-enterprise-partnerships.pdf](http://www.bis.gov.uk/assets/biscore/economic-development/docs/10-1026-final-letter-local-enterprise-partnerships.pdf)
- 46 9 August 2010 letter from the Rt Hon Chris Huhne, Secretary of State for Energy and Climate Change to all leaders and chief executives of local authorities on the changes to local authority rights to sell renewable energy [www.decc.gov.uk/assets/decc/News/376-unlocking-local-power-huhne-letter.pdf](http://www.decc.gov.uk/assets/decc/News/376-unlocking-local-power-huhne-letter.pdf)
- 47 Dorset LEP, June 2011, *Dorset Local Enterprise Partnership prospectus*
- 48 Swindon and Wiltshire Strategic Economic Partnerships, 15 July 2011, *The Swindon and Wiltshire Local Enterprise Partnership proposal*
- 49 Cheshire and Warrington Enterprise Commission, September 2010, *Cheshire and Warrington means business - a prospectus for a Cheshire and Warrington Local Enterprise Partnership*
- 50 South East Midlands LEP, 8 September 2010, *South East Midlands LEP proposal submission*
- 51 Sheffield City Region LEP, September 2010, *Proposal for a Sheffield City Region Local Enterprise Partnership*
- 52 Leicester and Leicestershire LEP, September 2010, *Leicester and Leicestershire LEP proposal*
- 53 Greater Birmingham and Solihull LEP, September 2010, *The Local Enterprise Partnership for Birmingham and Solihull with East Staffordshire, Lichfield and Tamworth proposal*
- 54 Cornwall and Isles of Scilly LEP, August 2010, *The case for a Cornwall and Isles of Scilly Enterprise Partnership*
- 55 London Enterprise Partnership, December 2010, *The London Enterprise Partnership proposal*
- 56 Lincolnshire County Council website [www.lincolnshire.gov.uk/business/lcc-services-for-business/economic-regeneration/enterprise-development/local-enterprise-partnership-lep/](http://www.lincolnshire.gov.uk/business/lcc-services-for-business/economic-regeneration/enterprise-development/local-enterprise-partnership-lep/) last viewed on 27 September 2011
- 57 Greater Lincolnshire LEP, 3 September 2010, *The prospectus for a Local Enterprise Partnership for Greater Lincolnshire*
- 58 Hull and Humber Chamber of Commerce, 17 August 2011, 'Humber Enterprise Zone bid successful', [www.hull-humber-chamber.co.uk/1120/news/2011/08/humber-enterprise-zone-bid-successful.aspx](http://www.hull-humber-chamber.co.uk/1120/news/2011/08/humber-enterprise-zone-bid-successful.aspx)
- 59 Central Office of Information, 17 August 2011, 'The Government announces 11 new Enterprise Zones to accelerate local growth, as part of the plan for growth' [nds.coi.gov.uk/content/detail.aspx?NewsAreaId=2&ReleaseId=420820&SubjectId=2](http://nds.coi.gov.uk/content/detail.aspx?NewsAreaId=2&ReleaseId=420820&SubjectId=2)
- 60 Ibid. and A Pearson, 17 August 2011, 'North East enterprise zone approved', [www.journallive.co.uk/north-east-news/breaking-news/2011/08/17/north-east-enterprise-zone-approved-61634-29251488/](http://www.journallive.co.uk/north-east-news/breaking-news/2011/08/17/north-east-enterprise-zone-approved-61634-29251488/)
- 61 Details of the Tees Valley enterprise zone from the Stockton-on-Tees Borough Council website [www.stockton.gov.uk/business/businessproinitatives/enterprisezone/](http://www.stockton.gov.uk/business/businessproinitatives/enterprisezone/), last viewed 27 September 2011
- 62 Central Office of Information, 17 August 2011, 'The Government announces 11 new Enterprise Zones to accelerate local growth, as part of the plan for growth' [nds.coi.gov.uk/content/detail.aspx?NewsAreaId=2&ReleaseId=420820&SubjectId=2](http://nds.coi.gov.uk/content/detail.aspx?NewsAreaId=2&ReleaseId=420820&SubjectId=2)
- 63 Manchester Airport, 7 April 2011, 'Airport City to commence at Manchester Airport in 2012' [www.manchesterairport.co.uk/manweb.nsf/Content/airportcitystart](http://www.manchesterairport.co.uk/manweb.nsf/Content/airportcitystart)
- 64 Department for Business Innovation and Skills on LEP start up fund and LEP capacity fund [www.bis.gov.uk/policies/economic-development/leps/lep-start-up-fund](http://www.bis.gov.uk/policies/economic-development/leps/lep-start-up-fund) and [www.bis.gov.uk/policies/economic-development/leps/lep-start-up-fund](http://www.bis.gov.uk/policies/economic-development/leps/lep-start-up-fund), both last viewed on 27 September 2011
- 65 HM Government, June 2011, *The natural choice: securing the value of nature*
- 66 Department for Environment, Food and Rural Affairs on Local Nature Partnerships [www.defra.gov.uk/environment/natural/whitepaper/local-nature-partnerships](http://www.defra.gov.uk/environment/natural/whitepaper/local-nature-partnerships), last viewed and updated on 26 September 2011
- 67 HM Government, June 2011, *The natural choice: securing the value of nature*
- 68 Department for Communities and Local Government, July 2011, *Draft National Planning Policy Framework*
- 69 Department for Communities and Local Government, June 2011, *A plain English guide to the localism bill*
- 70 Department for Communities and Local Government, July 2011, *Draft National Planning Policy Framework*
- 71 HM Treasury and the Department for Business, Innovation and Skills, March 2011, *The plan for growth*
- 72 Department for Communities and Local Government, 17 May 2011, 'Business and Communities to unite in driving neighbourhood growth', press release
- 73 Department for Communities and Local Government, August 2011, *Database on Local Development Frameworks: closure report – end December 2010*





Green Alliance  
36 Buckingham Palace Road  
London SW1W 0RE  
T 020 7233 7433  
F 020 7233 9033  
[ga@green-alliance.org.uk](mailto:ga@green-alliance.org.uk)  
[www.green-alliance.org.uk](http://www.green-alliance.org.uk)

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