

**PLANNING ENVIRONMENTAL POLICY:**

**a case study of an emerging  
environmental policy community in Kent**

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## **ABSTRACT**

Policy makers are increasingly aware of the environmental challenge created by the link between the incremental effects of local activities and global environmental problems. In Britain, local government and a network of environmental organizations share an interest in developing environmental policy to control and manage these local impacts on the environment.

Some environmental organizations gain access to policy-making in local government because mutual benefits are gained by sharing opinion, expertise, information and resources. Since policy-making is a political, administrative and technical process, the effective influence of environmental organizations on the outcome of policy depends on their contacts and their contributions in each part of the process. There are limits on how far democratically accountable local government will permit environmental organizations to share in the power of policy-making. Equally, there are levels of compromise required of environmental organizations, for the privilege of insider status in a policy community, beyond which they are unwilling to go on account of their principles and the views of their membership.

This study formulates a new typology of interest groups as a means of classifying environmental organizations; four of which are studied in detail. Procedures of environmental policy-making, key actors involved and some recent initiatives are studied within local authorities in Kent. The analysis evaluates the extent to which the level and type of contact between environmental organizations and local government is creating a new environmental policy community.

Some existing policy communities are facing the environmental challenge but are too limited in scope for the development of integrated environmental policy. There is only limited accommodation of the more radical, broad-based environmental organizations, but there are signs of a convergence of their characteristics with insider groups as their potential role in a genuine environmental policy community emerges.

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## **CHAPTER ONE**

### **THE ENVIRONMENTAL CHALLENGE: THE LOCAL RESPONSE**

'Think globally, act locally', the widely used slogan of Friends of the Earth and the Greens (Irvine and Ponton, 1988; Porritt and Winner, 1988), has recently entered wider political parlance (Burstow, 1989). It highlights global environmental problems, uses holistic ecological reasoning, and places a duty of care at every local level. Issues included are the interdependence of rich and poor, north and south (Independent Commission on International Development Issues, 1980), man and the planet: global warming (Leggett, 1990), high level ozone depletion (National Research Council, 1989), persistent and transported pollution (Bridgman, 1990; Carson, 1965), species extinctions (McNieley *et al.*, 1990), desertification (Mainquet, 1991) and resource degradation (Brundtland, 1987; Elsworth, 1990). The gloomy message is that the consequences of environmental change could be catastrophic; the optimistic note is that the cumulative effects of responsible local action could solve the problems (International Union for Conservation of Nature and Natural Resources, 1991; Sarre, Smith and Morris, 1991, p. 169; Starke, 1990; Ward, 1988). This is the environmental challenge.

In the 'North' the environmental challenge is emphasized as scientists link widespread environmental changes to human activities, and as the medical profession finds environmental causes for new threats to health and safety (European Conference on Environment and Health, 1989). Increased media coverage and public concern, coupled with the growth of environmental pressure groups, have given the environment greater political prominence. In the 'South' the environmental challenge is often more imminent, being intertwined with survival issues for the poor or the problems of weak economies following the resource squandering route to short-term growth (South Commission, 1990).

Few would disagree that solutions to the environmental challenge must be found; but who should take responsibility for devising environmental policy to meet the challenge, and who has the ability to effectively implement the policy? Existing economic, social and political systems have become adjusted to the environment as a free good: for resource extraction and for dispersing the waste stream. Any policy which restrains the free use of the environment puts a cost on existing exploitative systems. This limits the likelihood of the voluntary adoption of environmentally-friendly policies. Government action is necessary to devise policies which equitably distribute costs towards mutually desired environmental outcomes and to ensure adherence through the regulatory powers of public authorities.

The environmental challenge necessitates new policy goals which may conflict with existing policy at international, national or local level in either the public or private sectors. Ideally, policy is co-ordinated across all levels and sectors with none escaping responsibility for externalities resulting from their actions which impact on the environment and on other sectors and levels of organization. On the other hand, new initiatives can be instigated at any point on the spectrum of environmental responsibility as a lead to others and with incremental but not decisive effects on global environmental problems and worldwide quality of life issues.

This thesis focuses on local government in Britain and its role in environmental policy-making. A case study in Kent explored the relationship between the policy-making procedures of local government and environmental organizations with an interest in environmental policy. The overarching question asked is whether local government in Britain is capable of providing public policy responses which lead to the sort of local action required to meet the environmental challenge.

## Environmental politics and environmental groups

As with many issues before they reach the agenda of public policy, the environment has had many advocates. They have argued that it is worthy of special consideration both in its own right because of the risk of damage to environmental values and its dependent wildlife, and because of the implications of environmental change for human populations with their reliance on a healthy and productive environment. Advocates include scientists, media commentators and members of environmental groups. Lowe and Goyder (1983) cite a growth in the formation and membership of environmental groups since the mid-1960s as evidence of a wider environmental movement. Its origins stretch back to the romantic rebellion against industrialization in the eighteenth and nineteenth centuries. The twentieth century saw the growth of the conservation movement and the social environmentalist tradition of small scale co-operative lifestyles. These strands have come together in the ecological environmentalism of the second half of the twentieth century, but with an horizon that is global (Yearly, 1991).

Late twentieth century environmentalism demands action from decision-makers to plan according to ecological principles. Dissatisfaction with traditional political parties as effective agents for ecological planning has produced a political vacuum which is filled by green politics in the multi-party constitutions of Europe, but only recently having any impact on traditional party loyalties in Britain (Burke, 1990). At the heart of green politics is the belief that, ultimately, a majority of society can be persuaded to adopt less materialistic values based on concern for people and for the environment. At its extreme, this belief envisages the evolution of society into a post-industrial, ecological age.

Not all environmentalists accept the philosophy of green politics despite some sympathy with the objectives. They either believe that existing avenues through which to influence policy-makers are sufficient to safeguard environmental values or take the pragmatic view that the balance of power in society is such that education of the public and decision-makers in environmental values is the most effective means of

achieving incremental improvements of environmental policy through democratic processes. This places some faith in consensus government in which the insights of environmental groups are taken into account in policy-making whose goal is the balancing of conflicting interests for the common good in a stable society. An alternative view is that power is vested in market-dominated materialism which spawns environmental groups from the well-off, well educated middle classes (Lowe, 1977) whose actual motivation is the protection of their own patch whilst easing their consciences by the "safe radicalism of environmentalism" (Weston, 1989, p.2). In this model there is no intention to transform society since the dominant ideology is ultimately a class-based, self-interest in the natural environment rather than any concern for the human or social environment.

### **Local government and partnerships in environmental policy-making**

The environmental challenge presents local government with a set of difficult problems. The problems and their solutions are, at least partly, novel and, therefore, require a re-evaluation of existing policy and, possibly, policy-making procedures. These problems stretch the existing knowledge, expertise and resources contained within local government, but many environmental organizations have much to contribute. They will be motivated to do so if, in return, they can further their interests by influencing public policy-making. The following hypothesis focuses on this dual perspective:

#### **HYPOTHESIS 1A**

**Local government will widen its contacts with environmental groups in order to overcome shortfalls in its environmental information base and in its expertise and resources for environmental management, and to boost its role in environmental policy-making.**

#### **HYPOTHESIS 1B**

**With high levels of public awareness of environmental issues, a wide range of interests will seek to influence the environmental policy-making of local government but the success of their representations will be determined either by their acknowledged expertise in the environmental arena or by their credentials as representatives of public opinion.**

A second hypothesis prescribes changes in policy-making procedures as a means of approaching the environment more holistically:

### HYPOTHESIS 2

**An effective response by local councils to the environmental challenge requires new committee and/or departmental aims and structures to deal with the environment in a more integrated way than is possible under the traditional structure of local government.**

### Policy communities and issue networks

The two concepts of policy communities and issue networks have been developed to describe the inter-linkages, and often inter-dependence, between the political power of decision-making and the organized interests that seek to influence policy-making. They are used here as an analytical framework for the empirical study of local government-based policy-making.

A policy community (Heclo and Wildavsky, 1981; Richardson and Jordan, 1979) is an alliance of 'insider' groups (Grant, 1978) which form an interest-centred power structure (Laffin, 1986) which controls the decision-making process in a particular public policy arena. This neo-pluralist concept (Grant, 1989b, p.25) was devised to explain how pluralistic influences are constrained by procedures of policy-making. Policy-making is often vertically segmented, with government departments attracting a network of client groups to form a policy community. The characteristic membership of a policy community consists of:

- a) politicians with a special interest in a policy area;
- b) bureaucrats from the department responsible for the policy area;
- c) interest groups representing the beneficiaries of policy outcomes.

Membership is generally small and closed to other groups and public gaze, at least until well-developed policy initiatives are made public. They operate at a technical and routine level without query from formal political channels, to the extent that Britain has been described as a 'post-parliamentary democracy' (Richardson &

Jordan, 1979). Rhodes (1986, 1988) extends the concept to consider the relationship between central government, intermediary institutions (Grant, 1989a) and local government.

The power of the policy community through the mutual benefits of agreed compromise is often hard won and, thus, defended for its own sake and for the sake of future benefits from continuing membership of the policy-determining body. The autonomy of the policy community may be fragile in the face of claims from other potential participants, or of rivalries for resources from other policy areas. The relative political importance accorded to different policy areas will influence, as well as be influenced by, the power of a particular policy community. Some British policy communities, such as agriculture (Holbeche, 1986; M. Smith, 1990), are "small, tightly-knit and corporatist" whereas others, such as rural conservation are "large, diverse and pluralistic" (Cox, Lowe & Winter, 1986 p.16 and ch. 11). The identification of a policy community does not depend on its harmony, rather a common involvement in a particular policy arena. Unity may be precarious because of divided loyalties: for politicians, the power base of the policy community versus the democratic accountability of the council to local constituents; for officers, the status of the policy community versus the wider departmental brief and the needs of clients; and for interest groups, the influential benefits of 'insider' treatment versus the sometimes conflicting demands of their grass-roots membership.

The notion of an issue network has been proposed by Hecló (1978) as a more realistic description of the dispersal of power in policy-making activities. He claims that dominant actors (that is, key individuals (Blowers, 1984) or the leaders of organized groups) and policy communities are difficult to isolate because "webs of influence provoke and guide the exercise of power" (p.102) and that power is not vested in policy makers but is a quality of the "configurations through which leading policy makers move and do business with each other" (p.88). Table 1.1 summarizes the contrasts between the two concepts.

A policy community can be the empowered core of an issue network. In other cases, an issue network may either represent the emergence of concern in a particular

policy area for which no policy-making forum yet exists, or be a rival forum for discussing alternative policies. Heclo regards an issue network normatively as an open, policy-making medium which should operate without the constraints implied by a closed policy community. Some policy communities may have effectively cornered the technical argument to the confounding of any potential issue network, or may operate discreetly as part of the Secret State (Dearlove & Saunders, 1984, ch.5).

**Table 1.1 Characteristics of Policy Communities and Issue Networks**

<b>POLICY COMMUNITIES</b>	<b>ISSUE NETWORKS</b>
Clear and confined policy area	Often broad but identifiable policy area
Existing governmental policy arena	May be new policy area
Incremental policy change	May seek radical policy change
High degree of value consensus	Diversity of values
Procedural convention	Loose procedures
Small membership: includes politicians and officials	Wide membership: may include (target) politicians and officials
Concentrated power	Dispersed power: uneven relations
Discourage wider participation	Seek to widen policy debate
Stringent entry criteria: expert knowledge senior position soundness reputation for effective action	Low entry barriers: information, involvement or influence valued
Stability as policy issues evolve	Tendency to re-group or disband

## Is there an emerging environmental policy community?

The re-emergence at the end of the 1980s of the environment as an issue for which members of the public, politicians and a range of interest groups sought a policy response satisfied two requirements for the formation of an issue network:

- (1) the failure of existing policy in a distinctive policy area;
- (2) the existence of interest groups wishing and/or able to contribute to debate about public policy-making in that policy area.

At a time of intense public and political debate, there is an apparent openness in policy discussion: issues are discussed in the press, and between policy-makers and interested organizations. At this point, the discussion focuses as much on the problems and general solutions as on policy innovations leading to practical solutions. Substantial policy changes, especially those with resource implications, require a lengthy programme of information gathering, evaluation of alternative policy options and the passage of policy proposals through decision-taking procedures. This provides conditions in which a new policy community could emerge from the issue network:

- a) the search by government for reliable sources of information on the environment;
- b) the selection from the issue network by government of organizations which are likely to provide informed advice to government confidentially and without compromising other policy positions;
- c) the willingness of organizations to work with government in developing environmental policy without recourse to campaigning publicity that would embarrass the government.

A hypothesis which suggests that these circumstances currently apply to local government is postulated to guide the current study:

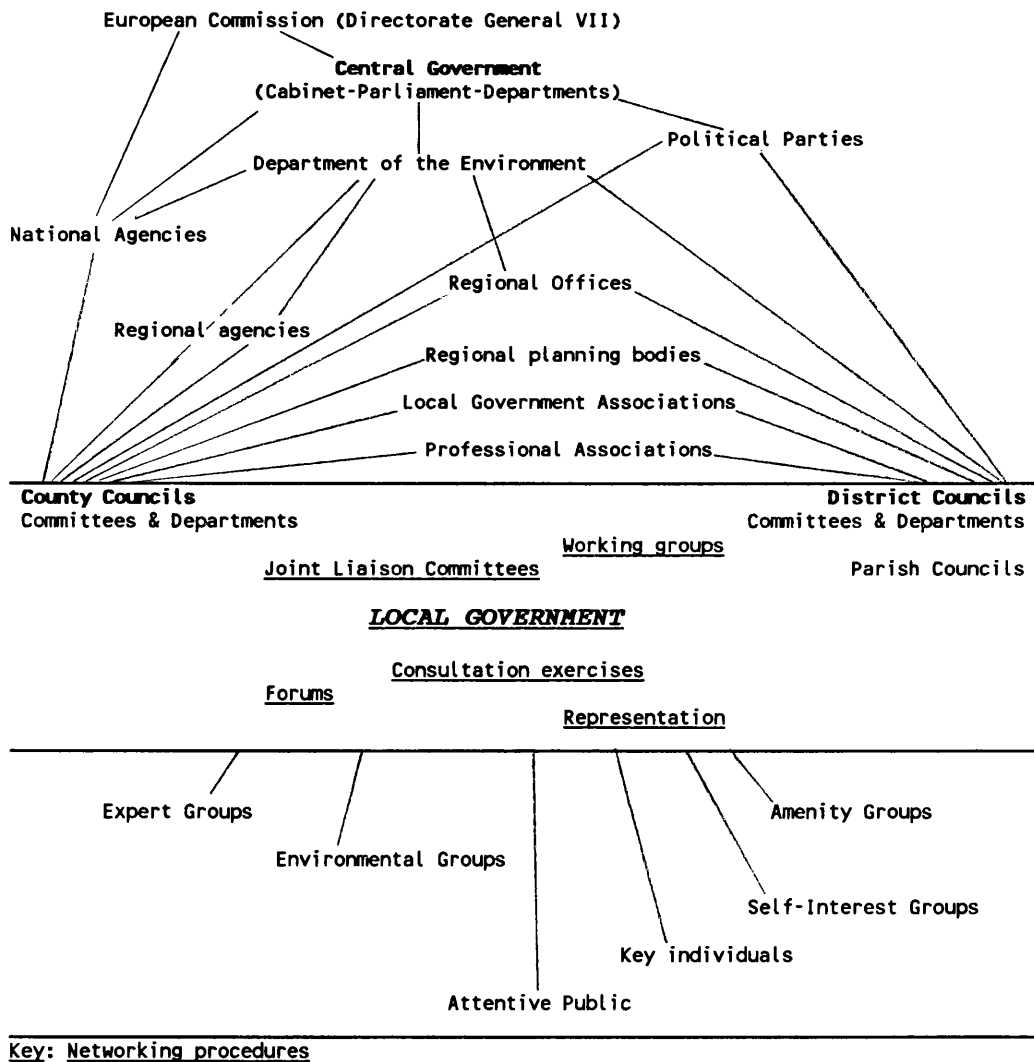
### HYPOTHESIS 3

**Growing public concern for the environment has led to dissatisfaction with existing environmental policy and created the conditions in which local government and a network of environmental organizations are discovering mutual benefits in the formation of a new policy community.**



Figure 1.1 explores the components of the broad environmental issue network from which an environmental policy community might emerge through the intermediary of local government.

Fig. 1.1 General components of an environmental issue network



## The study of environmental policy-making

This study focused on the development of environmental policy through local government, statutory agencies and environmental groups which were involved in various ways in the formulation and/or implementation of environmental policy. It studied the motives for involvement in environmental policy-making, the loci for the policy-making and the working relationships achieved by the participants and their effect on environmental policy. Comprehensive coverage was not possible given time, resource and access constraints. Recent environmental initiatives by local government are geographically patchy (Little and Peattie, 1991; Raemakers, 1990; Raemakers, Cowie and Wilson, 1991) and the study concentrated on lead initiatives rather than on embryonic policy-making.

The study was approached from two directions: from the perspectives of local government and of environmental organizations. Chapter Two discusses the role and powers of local government in environmental policy-making and summarizes the results of a sample postal questionnaire sent to authorities throughout Britain. Chapter Three develops a new typology of interest groups and introduces a classification based on the tactics of groups and their access to public policy-making. Chapters Four and Five present case studies from Kent. Chapter Four summarizes the results of a postal and follow-up telephone questionnaire on environmental policy initiatives in all local authorities in Kent, followed by more detailed case studies of three lead initiatives through personal interviews and visits to council offices to study committee minutes and other documents. Chapter Five explains how four environmental organizations were selected to represent the environmental network. They were studied through personal interviews with staff from national headquarters and subsequently from regional offices or local groups, as appropriate. Postal questionnaires were sent and group meetings were attended. Chapter Six draws together the information to evaluate the hypotheses presented in Chapter One and to discuss the nature of policy communities with an interest in environmental policy. The role of local government and its relationship with environmental organizations is discussed. The extent to which an environmental policy community is emerging is evaluated by considering the balance of favourable and opposing factors.

## **CHAPTER TWO**

### **LOCAL GOVERNMENT AND ENVIRONMENTAL POLICY-MAKING**

#### **The environmental challenge and governmental responsibilities**

Environmental issues have reached the political agenda of local government from a number of sources, including national and international government, party political networks, professional associations, public awareness, the media, environmental education and environmental interest groups. Some environmental issues fall within local government's mandatory duties and permissive powers for service delivery and regulation as delegated by central government. Others are the responsibility of central government, regional or other agencies (Table 2.1). The integrated and holistic management of the environment is complicated by these dispersed responsibilities. Consultative links between these bodies assist in co-ordinating an environmental policy response to particular environmental issues; the private sector relies on this network of interlinked responsibilities for gaining the necessary permission for development and other activities with impacts on the environment; and a variety of voluntary, environmental and amenity groups share an interest in the environmental policies followed by the public and private sector. All are potential members of an environmental policy community aiming for an integrated response to the environmental challenge.

Responses to the environmental challenge by local government will be determined, in part, by national and European Community legislation (Haigh, 1987) and grant provision (Forrester, 1989), but also through local authorities developing policies which implement their regulative, enabling, educative and service-providing roles in environmentally-sensitive ways. Their traditional role of protecting and managing the local environment in the public interest is propitious to such policy development.

**Table 2.1 Government and other agencies responsible for the environment**

<b><u>BODY</u></b>	<b><u>SELECTED RESPONSIBILITIES</u></b>
<b>CENTRAL GOVERNMENT</b>	Environmental legislation; Grant aid; Agricultural policy; Energy policy; Marine resources; Transport policy and trunk routes; vehicle emissions; Land use; Industrial and Trade policy
<b>COUNTY COUNCILS and METROPOLITAN DISTRICTS</b>	Highways; Footpaths; Waste disposal; Mineral workings; Structure Plans; Environmental education; Strategic Countryside and Recreational Planning
<b>DISTRICT COUNCILS</b>	Local Plans and Development control; Waste collection; Environmental Health, Leisure services; Country parks; Tree preservation; Conservation Areas; Local nature Reserves
<b>NATIONAL RIVERS AUTHORITY</b>	River and Ground Water Quality; Fisheries; Abstraction and discharge licences; Flood defence
<b>INLAND DRAINAGE BOARDS</b>	Land drainage
<b>HER MAJESTY'S INSPECTORATE OF POLLUTION</b>	Industrial pollution control
<b>AGRICULTURAL DEVELOPMENT ADVISORY SERVICE</b>	Advice to farmers on land management
<b>FORESTRY COMMISSION</b>	Forest management; Forest recreation
<b>ENGLISH NATURE</b>	Notification of National Nature Reserves and Sites of Special Scientific Interest; Management agreements with land owners
<b>COUNTRYSIDE COMMISSION</b>	Notification of Areas of Outstanding Natural Beauty, Heritage Coasts and Long Distance Footpaths; Countryside grants
<b>DEVELOPMENT CORPORATIONS</b>	Urban regeneration; Rehabilitation of derelict land
<b>RURAL DEVELOPMENT COMMISSION</b>	Rural services; rural development grants
<b>ENGLISH HERITAGE</b>	Preservation of Historic Buildings, Parks and Gardens
<b>NATIONAL TRUST</b>	Ownership and management of places of historic interest and natural beauty
<b>SOIL SURVEY</b>	Soil Survey; Land quality mapping
<b>GEOLOGICAL SURVEY</b>	Survey of underground resources
<b>METEOROLOGICAL OFFICE</b>	Weather forecasting
<b>PUBLIC UTILITY COMPANIES</b>	Water supply; Sewerage; Energy supplies
<b>DRINKING WATER INSPECTORATE</b>	Water supply quality
<b>NATURAL ENVIRONMENT RESEARCH COUNCIL</b>	Environmental research

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Sources: Department of the Environment (1986, 1990, 1991); Derbyshire (1979)

The rise of the 'environment' on the political agenda (Lowe, 1990; Lowe and Flynn, 1989a; Richardson, 1977; Solesbury, 1976) placed novel demands on the policy-making and policy-delivery functions of local government (Brooke, 1990). The breadth of the environmental challenge extended across the traditional committee and departmental structure of local government where responsibility for the environment was often fragmented and peripheral to service-provision functions. New budgetary allocation for environmental initiatives could merely accentuate a competitive, incremental approach to policy initiatives through existing departments and committees, with the environment becoming a finance-attracting, bolt-on-extra to existing policies. The demand for more integrated environmental policy coincided with pressures for internal reform towards more corporate policy-making with centralized budgetary control (Stoker, 1988; Stewart and Stoker, 1989). There is, thus, possible synergy between the establishment of corporate goals and the introduction of holistic environmental policy into local government. There are, however, a number of constraints operating on local government which may limit its capabilities, including limited powers, fiscal limits and structural weaknesses.

### **The role and powers of local government**

Local government has possessed a fair degree of autonomy in devising local policies for implementing its objectives (Goldsmith, 1990) but this has recently been eroded by central government (Goldsmith and Newton, 1984; Griffiths, 1986; Lowe and Flynn, 1989b; Thornley, 1991). Local government, as currently constituted is a means of:

- a) moderating and adapting central government policy intentions; and
- b) forming alternative policy communities to devise locally-appropriate policies.

Some local authorities have used local policy-making to oppose central government intentions (Goodwin and Duncan, 1989; Colenutt, 1990), whilst others have developed radical policies within central government guidelines, particularly through mobilizing the private and voluntary sectors (Thompson, 1990).

Budgetary constraints have limited the policy options available to local government: "Public-expenditure constraints have now killed off public-investment planning" (Brindley, Rydin & Stoker, 1989, p. 176). Legislative changes have also been important in re-defining the role and powers of local government and its relation with public and private agencies (Stewart and Stoker, 1989). New Right philosophy (Ridley, 1988) has emphasized the strategic enabling role of local government (Audit Commission, 1988; Brooke, 1989; Carter, Brown, Abbott and Robson, 1991; Clarke and Stewart, 1990), encouraging privatization and discouraging direct service provision by local authorities. The fear that local government will be reduced to committees on contract tendering may be overstated; but the power to materially influence the desired functioning of society is now more dependent on novel partnerships with government agencies, the private sector, and voluntary interest groups.

Partnerships are a means of negotiating mutual advantage through the pooling or exchange of resources such as expertise, capital and land holdings. The negotiating position (Barrett and Hill, 1984) of local authorities is based on their physical and technical resources, and their control over policy-making. Conflicts of interest between the profitability of capital or land holdings and the preferences of local authorities may be overcome through 'joint ventures' which release profitable initiatives within the framework of local authority policy. In land use planning, 'planning gain' obligations are a means of persuading developers to meet public sector objectives, including community or environmental benefits, in return for the grant of planning permission (Healey, McNamara, Elson and Doak, 1988). In other situations, partnerships are voluntary and co-operation in public policy goals is likely to be contingent on involvement in a relevant policy community.

## Policy-making processes in local government

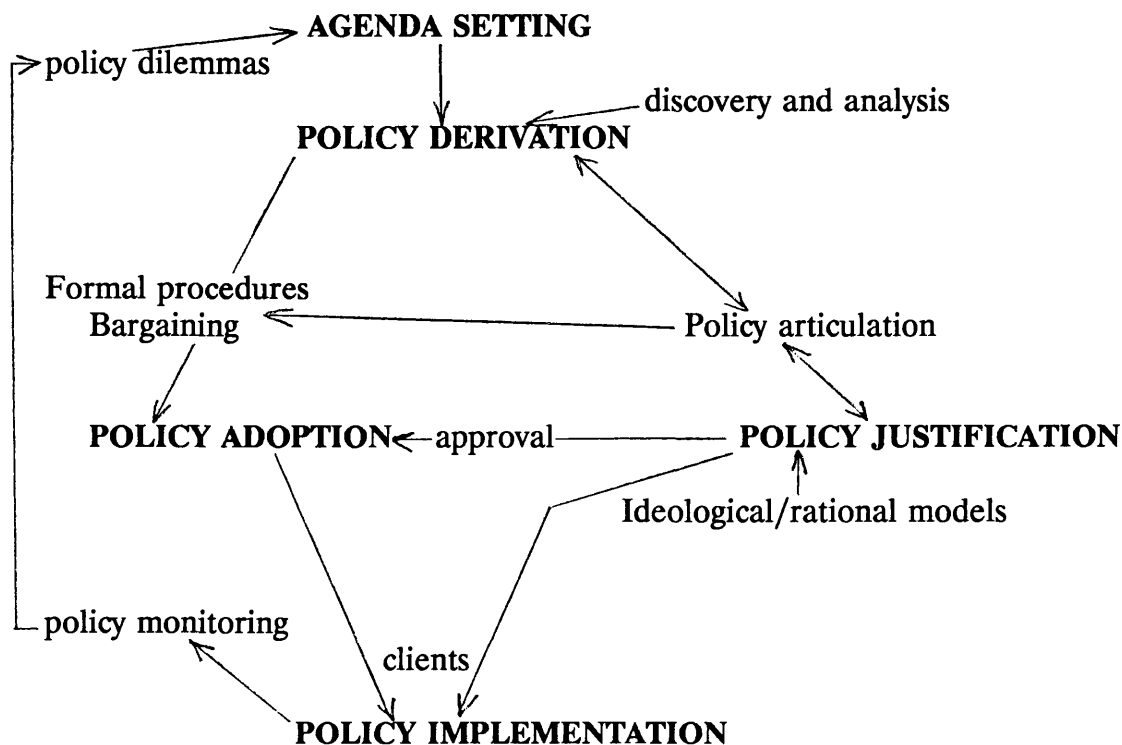
Local council policy is rarely explicit as a consolidated written code and evolves through committee decisions, the actions of Members and the operation of departments: "Policy is what the council does" [Bowers/9/90]. The minutes of committees and especially of full council meetings are the publicly available record of a council's policy, but are a broad account rather than a detailed rule book. This allows flexibility to take account of local circumstances and discretion on a case by case basis, but can hide less acceptable elements of policy such as inequitable distribution (Healey, 1990) and bias towards certain interests (Dearlove, 1973; Saunders, 1975, 1984).

Policy-making is not simply administrative procedures, although these can fashion the relative influence of the potential actors in policy-making (Newton, 1976; Saunders, 1984). Policy-making is usefully considered as a series of policy domains (Fig. 2.1). Each domain is a phased process involving: the setting of objectives, the analysis of alternatives, and the monitoring of results, but is interdependent with the other policy domains. The relative power of politicians, bureaucrats and interest groups will depend on their access to, and influence in, each of the policy domains.

"Policy choice normally lies in balance, for government has to weigh both values and interest" (Stewart, 1988, p. 100). The choices made by the actors in each policy domain are influenced by the political philosophy of the majority group and the professional (Laffin, 1986) and often class-based values (Davies, 1972) of officers. Interest groups add their own perspective, but access to the policy community may depend on political or professional screening by local government members and so reinforce their values and interests.

Not all actors have equal access, either to policy makers or to the various domains of policy-making. Neither do they have equal influence (Fig. 2.2) at the points where access has been gained. The situation is, however, dynamic with actors jostling for power to influence policy (Lukes, 1974; M. Smith, 1990).

**Fig. 2.1** Interrelations between policy domains



Policy phases: Set objectives - analyze alternatives - monitor results

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**Key: POLICY DOMAIN**

Source: Author, using categories from Leach and Stewart, 1982

**Table 2.2** Differential influences on local government

**SOME FACTORS DETERMINING THE INFLUENCE OF A CONTACT WITH LOCAL GOVERNMENT**

- . The importance attached by the contacted representative of local government to the route of access chosen by the person approaching the council
- . The position and effectiveness of the representative as a conveyer of information and opinion from the public into the policy-making arena
- . The status of the person approaching the council
- . The articulation and weight of the argument presented
- . The extent to which the argument is consistent with the ideology of the representative or the council more generally
- . The extent to which the argument is convergent with that received through other channels of communication to the representative or to the council



## **Taking the lead in the 'greening' of local government**

The Local Authority Associations took an early lead in exploring the environmental role of local government (Local Government Training Board, 1990). The Association of Metropolitan Authorities published *Action for the Future* (1989) consisting of an inventory of issues and possible solutions along with 180 recommendations under the headings: air pollution; water pollution; environmental noise pollution; waste management; energy; land; wildlife; built environment and environmental education. The document is critical of national government's environmental policy with its "poorly co-ordinated mess of policy development....with no clear lead or co-ordinating centre" (p.85). The document promotes local authorities as environmental protection agencies but rues "the squeeze on local authority budgets by central government" (p.85) and tends to favour enforcement and 'pollution taxes' rather than reliance on market forces to solve environmental problems. The Association of District Councils (1988) and the Association of County Councils (1990) also published general policy statements which emphasized their distinctive roles. The three Local Authority Associations joined forces in producing a consultative submission (1990a) for the Government's White Paper on the Environment and an extensive best practice guide (1990b).

In an attempt to assess the type of environmental policy followed by local councils in Britain, a questionnaire was mailed to sixty-four local authorities, partly selected by initiatives reported in the literature (for example: Allen, 1990a,b; Bennett, 1990; Davis and Dudley, 1989; London Borough of Sutton, 1989; Peterborough City Council, 1990; South East Economic Development Strategy, 1990; The Planner, 1990) and otherwise selected at random from a set of broad categories of authority (Rusbridge, 1992). The returned questionnaires (67% response rate) and the public and internal documents supplied by these authorities exhibited diverse responses to environmental policy-making and in the routes chosen to devise policy.

The responses distinguished several factors operating in lead rather than lag local authorities: immediate, significant environmental pressures; the motivation and ability

to make a strong political point out of the environment (especially where the majority party was not the same as that in central government); action by environmentally-conscious and motivated politicians and chief officers; and/or effective pressure on environmental issues from public opinion or organized groups. Several constraints operating were identified: *ultra vires* limits imposed by Parliament; budgetary limitations; the demands of rival policy heads; and the availability of in-house expertise in environmental matters.

Councils chose different routes by which to establish and promote their environmental policy but seven key methods were identified:

- (1) Adoption of an Environmental Charter or statement of commitment, containing publicly declared environmental goals for council policy.
- (2) Assessment of the environmental impact of council policies, such as an internal audit of resource consumption or a review of service delivery costs and benefits.
- (3) Preparation of a 'State of the Environment' report to assess local environmental problems and to provide a base-line for subsequent monitoring.
- (4) Launching of a number of discreet environmental projects as an Environmental Action Programme.
- (5) Preparation of a 'Green' Plan for the co-ordination of policy and as a guide to implementation.
- (6) Reliance on existing mechanisms such as service committee decisions and the production of Development Plans (sometimes with a leading environment section).
- (7) Establishment of an environmental forum or community network/ newsletter for consultation and/or implementation partnerships.

Councils often combined approaches in sequential stratagems, often from different starting points with subsequent stages in different orders. Comparison is complicated by confusion in the terminology used: for example, the term environmental audit has been used for what is better described as a State of the Environment report or for an audit of council policies; the term environmental strategy is widely used to cover

a public charter, or an action programme, or a council's committee-based statement of its policy.

Two departments of local government (Planning and Environmental Health) and one environmental organization (Friends of the Earth) were identified in the initial survey as having an important, though not exclusive, lead role in the development of environmental policy. The town planning and environmental health professions both have their origins in the public health movement (Holloday, 1987) of the nineteenth century. They have developed strong interests in the environment but from different perspectives relating to their specific powers and duties within local government. Inevitably, they introduce their own expertise into the initiatives which they promulgate.

The town planning profession has experienced difficulty in broadening its statutory role which is restricted to development and land use (Healey, 1989). More ambitious titles such as urban and regional planning (Hall, 1985), community planning (Nicholson, 1990) or environmental planning (Welbank, 1992) have not achieved widespread acceptance or legislative support. By contrast, the public health profession changed its name to Environmental Health at the re-organization of local government in 1974. As a result this profession gained a higher profile as environmental issues came to the fore and it astutely met new opportunities by providing a publicly visible and popular service. Environmental health professionals have traditionally had a regulatory and enforcement role regarding standards of workplace health and safety, domestic cleanliness and public protection from pollution (Bassett, 1987). They have been analysts and public health policemen. Their remedial role has expanded into preventative consultation with other professionals involved in the construction and uses of buildings, and development generally. Following stronger legislation on chemical emissions, discharges into waterways and the conditions of food preparation, the profession has been at the forefront of environmental measurement and monitoring. Armed with this information the profession is in a strong position to enter debates on the quality of the environment and the measures available to prevent environmental deterioration and to clean up degraded environments.

## Friends of the Earth and local government responses

Friends of the Earth were alerted to the growing interest of local government in environmental policy-making through:

- a) interest shown in their 'Recycling City' initiative (Friends of the Earth, 1989b);
- b) their employment as consultants for the pioneering *Kirklees State of the Environment Report* (1989);
- c) the growing number of requests for advice on environmental issues through their national office or local groups.

Friends of the Earth recognized the value of courting local authorities, especially at a time when central government resisted their lobbying (Friends of the Earth, 1990a). Though their resources were stretched by demand, they focused their research expertise on local authorities in order "to provide a bench-mark against which a council's policies could be compared" [Duncan/10/90]. They sought examples of 'Good Practice': relying on hearsay and the trumpeting of lead councils rather than on systematic survey. Their assessment was that local government had a range of policy statements on the environment but "not the breadth and depth of experience of Friends of the Earth for devising integrated policy" [Bosworth/7/90]. They combined expertise in research and campaigning with an appreciation of the agenda of local government in *The Environmental Charter for Local Government* (Friends of the Earth, 1989a).

The stated goal of *The Environmental Charter* is environmentally-responsible policies which derive from four underlying principles:

- (1) freedom of information on the environment;
- (2) prevention is better than cure;
- (3) the polluter pays principle;
- (4) the precautionary approach (that is, the presumption that an activity is environmentally damaging unless proven otherwise).

The summary version of *The Charter* lists six areas of environmental policy development and nine implementation mechanisms. An executive summary links

them by number references to the 193 recommendations listed in 'The Guide to Action'. This guide is divided by council functions for ease of dissemination to relevant implementing departments. Each section of the report outlines the environmental issues, the recommendations with explanations, inventories of benefits and good practice, contacts and relevant publications. This resource book pre-empted the developing policy of the Local Authority Associations and set a framework for action on environmental policy by local government. This coup was achieved through adept responsiveness to a ground-swell of interest in environmental policy innovations, ahead of local government's collective ability to agree strategy and devise integrated environmental policy.

Friends of the Earth exploited their lead by sending *The Charter* to Chief Executives of every council in England and Wales. Local groups were encouraged to follow up the initiative or, where there was no local group, the newly recruited Local Government Campaigner from central office sent a follow-up letter. Within a year close to a score of councils had adopted *The Environmental Charter for Local Government* by signing the Declaration of Commitment:

The authority will seek to promote the conservation and sustainable use of natural resources and to minimise environmental pollution in all of its own activities, and through its influence over others. This authority will review all of its policies, programmes and service and undertakes to act wherever necessary to meet the standards set in the charter.

Different local authorities rose to the environmental challenge in different ways, but many were prepared to accept the broadening of their agenda and the review of existing structures and procedures for the sake of delivering co-ordinated environmental policy. These new, integrated approaches do tend to aggregate the costs of environmental policy with some risk of dampening the enthusiasm of financially-pressed local authorities.

On the other hand, in a climate of public interest in the environment (Milne, 1990), pro-active policy responses and the championing of environmental initiatives at local level enabled councils to boost their popular standing. In the process of exploring the role of local government, new links were created with environmental organizations and through private sector partnerships, both of which increased the scope for local government to influence other agents of environmental change and to incorporate them into local environmental policy-making.

## **CHAPTER THREE**

### **INFLUENCING PUBLIC POLICY:**

#### **TYPES OF INTEREST GROUPS AND THEIR STATUS**

##### **Interest groups and their political status**

Political science from the early 1960's began to doubt the credibility of the liberal-democratic view of British politics based on the notion of the informed citizen and representative political parties leading to balanced and consensus decision-taking. It turned to interest group theory, which had developed in America in the previous decade (Dearlove & Saunders, 1984), to explain the balance of power in decision-making. Interest groups were seen, firstly, as a reaction to the strongly interventionist post-war state which had disturbed the previous equilibrium and, secondly, as a means of representing the complexities of power relations in the social, political and economic cross-fabric of society. Interest group theory states that groups gain their influence by articulating a single interest or policy in ways that exert pressure on government to shape public policy to the group's advantage. This is more aptly described by the term pressure group (Alderman, 1984; Bull and Millward, 1986; Davies, 1985; Grant, 1989b; Marsh, 1983). This leaves room for a wider definition of interest groups as:

'voluntary groups organized for political, social or economic reasons, each catering for a more or less limited set of interests or aspirations capable of attracting a group of people together'.

Some interest groups are organized for political motives; many are service organizations for members' needs; some combine both functions. Voluntary groups have the virtue of representing a specific group of people and are convenient points of contact for policy makers seeking advice or opinion in that area. The representative nature of many groups can be queried on account of their undemocratic organization and dependence on an activist core or a salaried staff

(Weston, 1989). However, the larger and more organized groups become, the more likely they are to adopt a democratic route for electing an executive (Lowe and Goyder, 1983, p.55).

Unlike political parties who must seek legitimation through election to government, interest groups need not be concerned with the whole gamut of public policy (Moran, 1989, p. 121). They are a means of organizing mutual interests with sufficient expertise and clout to tackle public policy-forming bodies. Some interest groups will target central government legislation as the single most important impact on their members' interest, whilst others with more local constituencies will seek to influence the service delivery functions of local government. There is no automatic link between the geographical spread of an interest group and the level of government that it will seek to influence. Local issues may sometimes only be resolved through national decisions, and many nationally organized interest groups will target international as well as national government with attention given to local government through regional or local members' groups.

### Types of interest group

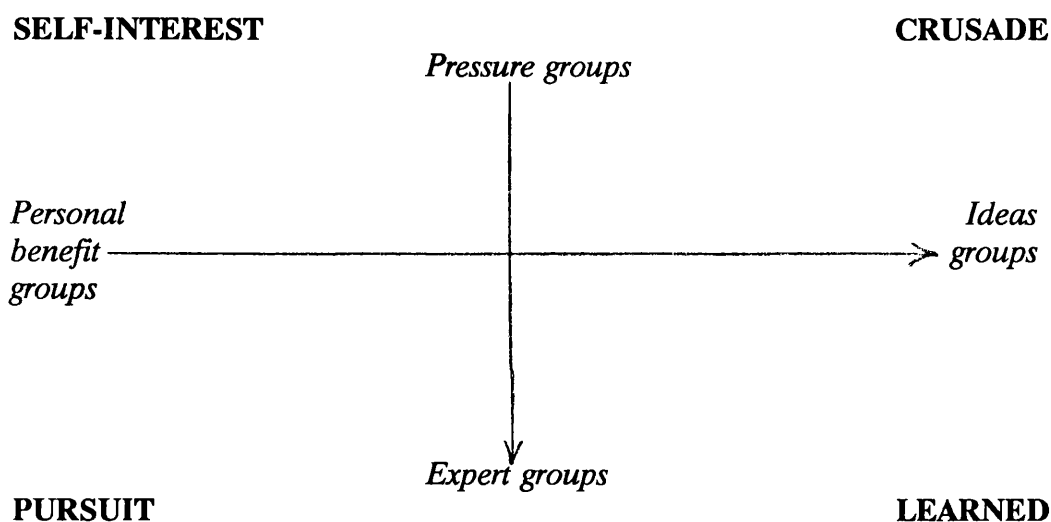
With a growing literature on interest and pressure groups, there has been a burgeoning of descriptive terminology. Unfortunately this is not applied consistently and no consensus or agreed analytical framework has been reached. One problem has arisen from using the term 'interest group' as a sub-category. Thus, Interest Groups which represent the common interest of their members are separated from Ideas Groups (Stacey, 1968), or Principle Groups (Lowe & Goyder, 1983, p.33), which champion a set of values without a shared self-interest to bolster. This is unsatisfactory because of ambiguity in the term 'interest' which can refer to personal benefit, especially of financial gain, or to the wider connotation of involvement in a pursuit or adherence to a philosophy. Neither of these necessarily lead to personal gains, although there is clearly a self-satisfaction in the involvement. A second problem arises because the term pressure group is "a misnomer, as it characterises a type of activity rather than a type of association" where pressure group activity is



"the efforts of organised groups to influence the decisions of public authorities" (Lowe & Goyder, 1983 p. 2). The term may be broadened to encompass influence on private corporations or even powerful individuals.

A new typology is presented here which recognizes two dichotomies and suggests a typology of groups as those occupying extreme points on two transverse axes (Fig. 3.1).

Fig. 3.1 A new typology of interest groups



The first axis describes a continuum from Personal Benefit Groups to Ideas Groups and the second axis a continuum from Pressure Groups to Expert Groups. The first axis represents a trend from self-centred to selfless, and the second from politicized to internalized activity. A four-class typology occupies the four points where the extremes of these axes intersect. Thus, Self-Interest Groups seek member's personal benefits through exerting political pressure. Such benefits may be material in Stacey's sense of Interest Groups or embrace Lowe and Goyder's distinction of sharing a common interest. Hirsch (1977) introduces the term 'positional goods' in a way that removes any distinction between material or non-material benefits, as does the Self-

Interest categorization. The term Interest Group is only retained as a broad generic term. Crusade Groups are those groups that promote an idea politically, often based on a set of principles which may be ethical or conceptual but which are motivated altruistically. Learned Groups are based on an academic or professional discipline without political motivation. Pursuit Groups relate to non-political activities followed for shared personal benefit such as leisure and hobbies.

This typology teases out some of the confusions in simpler classifications and provides a contextualizing matrix in which to locate groups which combine features of the extreme types. It particularly allows for the concurrent recognition of levels of political activity and types of association. Since these are explicit they are less likely to be confused. The position of a group within the matrix may be dynamic; for example, a group founded solely around an esoteric interest or a shared pursuit may reach a point where the development of the group's collective identity touches on politically expressed issues. If the group should enter into pressure politics, it may inadvertently create beneficiaries from the ideas and principles being proselytized. Unless membership is closed, through qualification or other quality unobtainable by the beneficiaries, the group will tend towards a membership of potential beneficiaries even though the stated aims of the group are quite unconnected to the self-interest of members. The converse is also true that Self-Interest Groups are capable of altruistic motives in the pressure they apply, though probably not where this demonstrably harms a significant number of members. These caveats are important as politicians and officers may apply filters in evaluating representations from different interest groups according to an assessment of the motivating forces behind their existence. To be regarded as a pressure group may carry disadvantageous overtones compared to a group representing a body of expertise and reasoned opinion. Politicians are likely to look for, and perhaps magnify, the covert reasons for the attentions of any group suspected of exerting political pressure rather than providing dispassionate advice (Fujishin, 1975).

Lowe and Goyder (*op. cit.*) discriminate between Emphasis and Promotional types of Principle Groups, the former being concerned with the protection of values and

latter with the promotion of value change. In the typology described above the terms protectionist and promotional are applied as sub-categories to either Self-Interest or Crusade Groups. Thus, Crusade Groups may be promoting a value change not based on self-interest or they may be defending values either in the face of threatened value change or in a watchdog role protecting previous reforms. Causes such as the environment or the countryside may become crusading banners for groups that are more appropriately classified as Self-Interest Groups if the majority of members are likely to be personal beneficiaries of the crusade (McNab, 1991; Portman, 1991). Motivations may be obscured, even within the membership of a group, so that a certain amount of value judgement was required in placing groups within the matrix (see Fig. 6.2).

The classification was extended to include agencies with appointed members, such as the statutory agents of government or non-government organizations (Newman, 1981) as these can have comparable characteristics, though without subscribing members. Voluntary environmental groups and environmental agencies were considered together as environmental organizations in this study.

#### Access by pressure groups and expert groups to policy-making

The subdivision into expert and pressure groups is not water-tight: many expert groups will at times exert pressure on government outside of customary consultation and many pressure groups have, or seek to establish, an expertise which helps their case and may incidentally, or eventually even routinely, assist in government. Nonetheless, at the extremes there is likely to be some resistance to overt pressure groups entering into policy-making whereas relevant expert groups are likely to be encouraged. This receptiveness of government to particular groups has been used to classify groups as insider or outsider groups (Grant, 1978, 1989b; Hatch, 1980) and whose strategies in influencing public policy range along a continuum from institutionalized insiders to rank outsiders (Pross, 1986) and from persuasion to protest (Table 3.1).

Table 3.1 Types of insider and outsider groups

Class	Relation with policy-makers	Use of media	Tactics
<b>INSIDER</b>			
<b>Prisoner</b>	Dependent, persuasive	Avoid controversy	Work within guidelines
<b>Low profile</b>	Intimate consultation	Rare	Frequent meetings
<b>High profile</b>	Round table (discussion)	Occasional; (focused)	Occasional <i>meetings</i>
<b>OUTSIDER</b>			
<b>Potential insider</b>	Distant consultation	Cautious but persistent	Cultivate contacts
<b>By necessity</b>	Public (consultation)	Frequent (often naive)	Seek public <i>support</i>
<b>Ideological</b>	Protest letters	Media attracting	Public spectacle campaigns

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Derived from: Pross (1986) and classes of Grant (1989b)

Prisoner insider groups are those in, or closely linked to, the public sector such as grant-aided Commissions and Local Authority Associations (Isaac-Henry, 1984) which, although working at arms length and in an advisory capacity, are limited in the extent to which they can publicly, or even internally, oppose government policy. Low profile insider groups are publicly secretive in return for close consultation with government, whereas high profile groups trade a degree of restraint on their power for entry into policy-making discussions. Outsider groups are excluded from most policy discussing forums, especially the informal contacts which favour many insiders. At the extreme, ideological outsider groups reject the legitimacy or efficacy of normal channels of political debate. Others are outsiders 'by necessity' because of a lack of sophistication in presenting their case to policy-makers or because their perspective is not considered significant by policy makers. Potential insider groups have more developed political skills, and may put much effort into available channels of consultation, but have not yet attracted sufficient interest from policy makers to be invited to participate in internal meetings.

Weston (1989) has suggested that groups which began as outsider pressure groups evolve over time from radical to conformist to conservative. This results from their original message becoming generally accepted by society and from their incorporation into government decision-making. Such a transition from outsider to insider groups may be over-simplistic. Some groups oscillate around a threshold between insider and outsider. Sometimes and on some issues, they are intimately involved in policy-making, otherwise, they are excluded from key policy decisions, maybe because of publicly-stated policy disagreements, or because of the prerogative of the decision-makers (Stoker and Wilson, 1991). For the group there is a tension between seeking the benefits of the insider, as against following outsider tactics that exploit external channels of influence, thus risking the trust on which the insider relationship depends. While there are undoubted links between the tactical strategies employed by interest groups and the status which they enjoy within policy-making procedures, these are not deterministic (Whiteley & Winyard, 1987). An organization's status is linked to many other factors such as its economic, statutory or political power, its political acceptability or attractiveness, and the historical precedents for its consultation on particular policy matters. An organization's tactics are linked to specific circumstances including the stance of the leadership, the perceived effectiveness of a particular approach in a given situation, and presumptions about the security of tenure of any insider status.

## **CHAPTER FOUR**

### **KENT: ITS ENVIRONMENT AND LOCAL GOVERNMENT**

Kent is an ancient county being the earliest recorded place name in England. The historical split between the Men of Kent centred on Maidstone in the West and the Kentish Men, originally of Cantii then of Jutish stock, centred on Canterbury to the East is still present as an undercurrent in relationships between the fourteen Districts of Kent. Maidstone was chosen as County town in 1814 owing to its geographical centrality in spite of rival claims from the two cities: Canterbury and Rochester. Kent is known as the Garden of England on account of its mild climate which supports orchards and hop fields amidst more widespread types of agriculture. Only medium-sized towns have developed although the outer suburbs of London spread into north west Kent which lost territory to the metropolis in 1889 and 1965. Metropolitan Green Belt now protects much of west Kent from the extension of development. Coastal towns have developed as seaside resorts or as industrial centres around dockyards, many of which have closed. New motorways and the expected Channel Tunnel Rail Link make Kent an important transport corridor to Europe and London with strong development pressures (Buckley, 1989; Kent County Council, 1991).

## **A summary of environmental initiatives in Kent**

Generally, councils in Kent that took significant initiatives in the development of environmental policy late in the 1980's have continued the momentum with genuine but modest resource shifts to environmental programmes. Later initiatives in other councils have stalled and may flounder. The threat of charge-capping to several in East Kent has precipitated staff cuts and the postponement of 'non-essential' projects in both Environmental Health and Planning. To date all adopted Charters and Audits have been championed by Environmental Health Departments. Some Planning Departments have initiated moves in this direction, others have preferred 'green' Action Plans applicable to small areas. Most of these initiatives (Table 5.1) are council-led with public participation, wider consultation and implementation partnerships being developed at later stages. Countryside Forums are at the early stages of development and Maidstone's Quality of Life Forum is a recent, politically-significant move to encourage local involvement in the environmental planning of the Borough. Recent Development Plans strengthen protective environmental policies but more radical 'greening' influences may enter the Local Plan agenda through the Third Review of the Structure Plan and the adoption of environmental policy statements by District Councils.

These initiatives do not amount to a cross-County co-ordination of response to the environmental challenge but they do exhibit a will to tackle environmental issues at local level. Three case studies were followed up: Kent County Council with its potentially integrating role, and two Borough Councils which took a lead role and had achieved a clear policy goal by Spring 1991 (Tonbridge and Malling, and Swale).

**Table 4.1 Examples of public policy initiatives in the local authorities of Kent, with special reference to the environment**

<b>AUTHORITY</b>	<b>INITIATIVE</b>	<b>LEAD DEPARTMENT</b>
Ashford BC	<u>Green Corridor Action Plan</u> (River Stour Valley) - recreation, landscaping and protection	Planning
Canterbury City C	Internal audit (external consultants) proposals suspended with Council change Countryside Officer. ( <u>Customer Care Charter</u> )	Planning (Chief Executive)
Dartford DC	<u>Environmental Protection Policy Statement</u> : Sept 1990 - response to FoE Charter Active in pollution control	Environmental Services
Dover DC	<u>Internal policy audit</u> : 1990: no resources to extend. Health Charter proposals dropped: resource constraints <u>Dover Strategy</u> to promote industry and tourism: has little regard to the environment	Environmental Health Health Promotion Unit All
Gillingham BC	Working committee on the environment; Countryside Forum	Planning
Gravesham DC	<u>Environmental Issues</u> : position statement - existing policies & response to legislation IMPACT project completed	Environmental Health County Planning
Maidstone BC	<u>Annual Report on the Environment</u> <u>Draft Environmental Charter</u> ; possible Internal Audit Participation in SEEDS Green Plan workshops Quality of Life Forum	All Environmental Health
Rochester upon Medway City C	State of the Environment Report (committee stage)	Environmental Health
Sevenoaks DC	Council Statement and Activity Review: <u>Taking Action to Protect the Environment</u>	Environmental Health All: implement/review
Shepway DC	Environment Working Group: Audit & Charter planned	Planning
Swale DC	<u>Environmental Audit</u> (external consultants:8/90) Environmental Strategy Committee <u>Environmental Strategy</u> : April 1991	Environmental Health
Thanet DC	Environment working party: preparation of a <u>Charter</u> - produced 1990 but not released as cost implications IMPACT project completed	Technical Services (Engineer) County planning
Tonbridge & Malling BC	<u>Environmental Charter</u> : May 1991 Environmental Strategy Sub-Committee Recycling Officer and <u>Recycling Directory</u>	Environmental Health Engineering Services
Royal Tunbridge Wells BC	Environment-led <u>Local Plans</u> : 1991	Planning
Kent County C	Environment Programme; Environment Team; Environment section: <u>Draft Third Review Structure Plan</u> Countryside Forum Transport Action Forum	Corporate Planning Highways & Transport

Key: C - Council; B - Borough; D - District; Documents produced

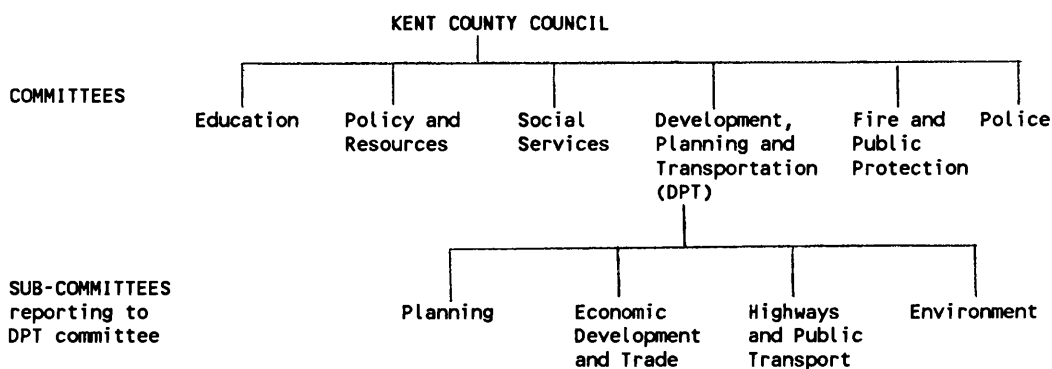


## Kent County Council's role in environmental policy

Kent County Council has its main offices in the County town. Kent is the third most populated 'shire' county in England with 1.5 million residents. Politically the Conservatives have a clear majority (54, Labour 25, Liberal Democrats 20) although strong minority representation is returned from several urban wards. The Council has taken the lead in co-ordinating multi-agency responses on environmental issues through its review of the Kent Structure Plan, through its Countryside Strategy and Countryside Forum, through its Kent Transport Action Forum, and through its Environment Programme.

An Environment Sub-Committee was inaugurated in June 1989 via a change in name for the Amenities Sub-Committee which had been established ten years previously when the Amenities and Countryside Committee was absorbed into the Development, Planning and Transportation Committee. The re-organization into a few large main committees (Fig. 4.1) was designed to strengthen the corporate management of the County Council and to create more integration between departments with overlapping responsibilities, in this case Highways and Transportation, Planning and Economic Development. The founder chairperson of the Environment Sub-Committee stated that "the change of name was a response to the growing interest in environmental matters but, in fact, more accurately reflected what the Sub-Committee was already doing" [Trench/7/91].

Fig. 4.1 The committee structure of Kent County Council



Although the Environment Programme was a corporate initiative the parent Committee was "not given the status of a main committee; its aim was to become the conscience of the County Council so that the environment should be taken into account by other committees through suggestion, not by compulsion, nor with monitoring powers" [Trench/7/91]. The founder chairperson exercised tight control over the committee with Members needing to raise issues outside of committee with the Chair, who sought officers advice on feasibility and budgetary implications before raising an agenda item. As a result, broader and contentious issues such as supporting public transport, and more radical environmental issues such as sustainability, were excluded. The chairperson advocated representative politics through political links with town and parish councils as the most effective consultation over environmental initiatives.

The Environment Programme was initiated in September 1990 to develop a high profile corporate strategy on the environment through a team of two, based in the Planning Department. The Environment Programme Co-ordinator was seconded for six months from the Chief Executives's Department whose policy review section leads new corporate projects. The Clean Kent Campaign Co-ordinator, who was recruited in 1989 to promote a corporate Keep Britain Tidy initiative, became Campaign Co-ordinator. The Team reported to the County Planning Officer in his corporate role of co-ordinating environmental policy. An Environment Programme Manager was appointed from a similar post in Humberside to replace the Environment Programme Co-ordinator and a third post has been established.

The Team report to an Environmental Planning Team comprising senior officers from departments across the Authority to provide cross-department commitment to The Programme. Servicing this rather cumbersome officer's group proved onerous at the outset when it met so frequently that there were insufficient agenda items. Diminishing attendance posed a dilemma with the risk that The Programme would become associated with the Heads of Departments who report to the Development, Planning and Transportation Committee rather than with the whole authority.

An early campaign to be incorporated in the Environment Programme was the Industry in Kent Environment Award scheme which had been established in 1986 by the County Planning Department under the sponsorship of Kimberly-Clark: a Maidstone soft-tissue manufacturer. The awards were designed to promote a better image for industry which had reacted negatively to local authorities' environmental protection policies without appreciating their own role and the mutual benefits in environmental enhancement initiatives. The awards encouraged landscaping and structural improvements and provided valuable public relations for industries based in Kent and, at the same time, established a nucleus of sponsors for County initiatives and, later, partners in the Environment Programme. Under The Programme, the awards were broadened to include the manufacture of environmentally-acceptable products, land reclamation, pollution abatement technology, community support by industry, the design of new developments, energy conservation and site management. From 1990, there were eight categories of award, with an overall winner as the firm which embraced the largest range of environmental issues within a corporate strategy: the intention being to encourage companies to adopt 'cradle to grave' environmental auditing (Chambers, 1990; Elkington and Burke, 1989; Van Pollen, 1989; World Wide Fund for Nature, 1990).

'Promotion' and 'Partnership' were key words in the planning of the Environment Programme. A twice-yearly, glossy tabloid *Elements* publicized the environmental achievements of the County Council and its partners. Although time-consuming to produce, *Elements* was a tangible tribute to the Team's achievements that would otherwise only be credited to the implementing departments rather than to the corporate catalyst. Contributions to *Elements* from departments and partners helped the Team to discern their corporate role amongst a rich variety of perspectives on environmental issues. For example, the Police stressed safety rather than aesthetic issues as the core of people's perception of environmental quality; whilst Arts & Libraries stressed the role of art in environmental design and urban regeneration. Not surprisingly, the Team balked at defining the environment, though rejecting too wide a brief: "taking everyone with you gets nowhere, whereas a narrower focus provides a driving force for setting targets and achievable goals" [Rees/7/91].

Departments were not easily persuaded that the internal policies of the authority, rather than the 'external and green', were legitimately part of the Environment Programme. Only the Police and County Secretary's Departments possessed their own environmental policy on energy and water conservation and waste recycling. A natural association of the environment with countryside matters was more readily overcome as the Environment Branch of the Planning Department included a countryside section and a building conservation team, and County Members were motivated by urban environmental issues. The Planning Department produced the *Kent Environmental Assessment Handbook* (1991) for major highways and planning applications, but Environmental Appraisal to evaluate policies adopted through all committees of the Council has not yet achieved widespread support. Nonetheless, initiatives have the weight of corporate policy, with rights of appeal through the County Planning Officer to the Chief Executive. This has been important in persuading Departments to include environmental policy statements in published Strategy documents, such as the Economic Development Strategy.

Certain areas of Council policy were poorly integrated into the Environment Programme: the link with waste disposal was tenuous, and environmental education had low priority. This is changing: the Recycling and Anti-Litter campaigns include County staff as well as the public in their awareness targets; the newly appointed Environmental Education Co-ordinator has established information and support services for schools and an Environmental Education Forum. The Environment Team had difficulty in objectively evaluating departmental responses to the corporate initiative, but reported limited success in negotiating departures from established policies. Departments were prepared to consider where the Environment Programme might fit into their programmes; questions of where departmental priorities fit in relation to the Environment Programme were not yet on the agenda. Land and property holdings posed a dilemma for the Council: their primary purpose had been for service delivery functions but fiscal constraint and tight financial management put a premium on their market value rather than their contribution to public service goals, including environmental enhancement.

A project-led approach (Table 4.2) characterizes the Kent Environment Programme, encouraged by the backgrounds of the founder team, the corporate management strategy applied and the political stance of the majority party epitomized by the enabling philosophy: "Our role is to co-ordinate; there is no point spraying around resources with modest effect, so we concentrate on a few projects where the effects can be shown" [Trench/7/91]. Some senior officers pressed for a County Council policy statement on the environment but were resisted by the Team and Committee: "You can do little within broad policy statements but the precise objectives sought by a project management approach provide a kick start to a programme using only existing staff and a limited budget with a simple mission statement to guide them" [Bateman/7/91]. Projects were mostly 'seed-corn' exercises to lever funds from partners and other sources and proved easier to launch than internal initiatives.

The Environment Team sent a questionnaire to other County Councils on their environmental policy, enclosing a copy of *Elements* to broadcast the Kent approach. Of the returns received, the Lancashire Forum involving district councils and voluntary groups was applauded, whereas extant environmental strategy statements were regarded as light weight and lacking in visible results. Forums were favoured for raising issues for debate rather than for achieving policy agreement; policy responses being decentralized to the participants' own organizations.

The partnership status of the organizations involved in the Environment Programme varied. Some organizations are statutory consultees and agencies, others are voluntary groups, whilst companies are either sponsors or have an interest through their products or through promotion of an environmentally-friendly image. Several initiatives are managed and funded jointly with District Councils. Members of the Team referred to networking and synergy as tactics followed:

- a) to raise the profile of the environment within the authority and publicly;
- b) to increase the information flow about environmentally-acceptable activities;
- c) to increase co-operation and the pooling of resources in environmental projects.

**Table 4.2 Kent County Council initiatives and partnerships**

<u>INITIATIVES</u>	<u>FEATURES</u>	<u>PARTNERS WITH KENT COUNTY COUNCIL</u>
<b>POLICY INITIATIVES</b>		
Structure Plan	Third Review: environment-led	Wide consultation
Kent Transport Plan	Environmental impact assessed	
Kent Impact Study	Channel Tunnel and High Speed Link	Interest groups, farmers, landowners, community groups
Kent Countryside Strategy	Tree planting & improvement	Kent FWAG, CC, MAFF, KTNC, KCC
Landscape rehabilitation	Three demonstration farms	Landowners: FA, KTNC, EN
Links Farm Project	Bryn Green idea: Wye College	
Regional Park Links	Statutory responsibility	Enforcement agencies: NRA, HMIP, DC's
Waste disposal Plan	(Environment Protection Act)	
Waste regulation Plan	Countryside/development appraisal	
North Kent Marshes	Sculptures and murals	
Art and the Environment		
<b>FORUMS</b>		
Kent Countryside Forum	May 1991 (Chair of Environment Sub)	KPOG, CC, EN, RDC, FA, FE, NT, KFAS, KRCC, APC, KALO, KTNC, BTCV, RSPB, RA, CLA, ADAS, NRA, NFU, FWAG, CBI, BHS, SEETB, KRV, CPRE
Kent Transport Action Forum	Information & teacher support	Transport 2000, CPRE, KTNC, DCs, Community groups
Environmental Education Forum		Schools, Curriculum Support Services, Woolwich BS.
<b>URBAN PROJECTS</b>		
<b>IMPACT = IMPROVEMENT ACTION</b>	Gravesend & Regency Ramsgate	GR, TH, planners, architects, public & private sector
Whitstable Improvement Trust	Extended: DO	Civic Trust, Business in the Community
Town Centre Management	Independent	CA, KCC Economic Development
Town Scheme programme	Maidstone, Herne Bay, Gravesend	Private sector
	Underground cables in	Public utilities: 12 towns
	Conservation Areas	
Building Conservation Centre	West Kent College TW	
Kentish Peg Tile Initiative	Grant aid	Private sector
Vinters Valley Park	Management	Community Trust
Traffic calming	Six schemes	KCC Highways
<b>RURAL PROJECTS</b>		
Countryside Management	Conservation, enhancement	DC's, CC, statutory, voluntary agencies,
	Local project officers	local businesses, farmers, landowners, local communities
	Urban fringe	CC; LB Bexley, DA, GR, SE
	Linked with CAPS 1993	DO, SH; CC, EN, KTNC; NT: Eurotunnel, volunteers & schools
- North West Kent	Planning stage	CC, TW (& SE, AS)
- White Cliffs	Improve urban fringe areas	AS, CA, TH
- North Downs Way	Greenlink: greening of major routes	Sponsor: Woolwich BS
- High Weald	Allington to Tonbridge	Groundwork, Department of Transport
- Stour River Valley	After 1987 Great Storm	CC, NRA, MA, TM (& RO)
Kent Thames-side Groundwork	Advice, clearance & replanting	Replant the Garden of England Trust
Trust	Volunteer Parish Tree Wardens	MA, SE, TM, BTCV, KTNC, EN, Task Force Trees (CC);
Medway River Project		
Replant the Garden of England		
Trees for Kent		
<b>Recreational paths:</b>		
- Parish Paths & Adopt a path	Local stewardship: 15 parishes	CARE - Community Action for the Rural Environment
- KCC centenary Paths Project		CA, MA, RO, Tonbridge Civic Society & Sevenoaks Society
- Saxon Shore & Greensand Ways	Reinstate all damaged bridges	RA
- Darent Valley Path etc.	on Rights of Way network	NW Kent Countryside Project, Times/RICS award.
Bridge kits project		KCC Direct Works Organisation, volunteers
		Consent: landowners, NRA, Inland Drainage Authority
<b>SURVEYS</b>		
Archaeological monuments	Recording and mapping	KAS, EH
Listed Buildings		EH
'Buildings at Risk'	300 in need: £5.85m estimated cost	Kent Building Preservation Trust, DC's, EH
Traditional farm buildings	Priority in Countryside Strategy	Cobtree Museum
Habitat Survey	Pilot management in Ashford	DCs; KTNC, EN, NRA; BR (Rail Link project)
Ancient Woodland inventory	30 year changes by aerial photos.	KTNC
Road verge survey		KTNC
Land Utilization change		CC
<b>OWNERSHIP</b>		
Clean Woods SSSI		Consortium bought KCC, SW, CA: RSPB manage
		Woodland Trust owns other woods
<b>PROMOTION and CAMPAIGNS</b>		
Industry in Kent Environment	Landscaping & improvements	Sponsor: Kimberly-Clark (MA soft tissue manufr.)
Awards	Environmentally friendly products	
Learning through landscapes	Small projects grant scheme	Environmental education support groups
Photographic competition		'Adscene' local newspaper, CPRE
Best Kept Village Competition		Schools, Eurotunnel sponsor
National Tree week	Replanting grants	Landowners, schools, CC Taskforce Trees.
Farm & Countryside Initiative		MAFF, Hadlow College
KCC Conservation Show	Conservation trades and products	
Square Mile Project	Partnership newspaper	Young people, Clean Kent & British Telecom
Elements	Handbook	Sponsor: Woolwich Building Society
Kent Environmental Assessment		
Waste and litter	Plastic recycling: Cuxton	Most DCs
Recycling centres	'Colonel Acorn' touring campaign	Schools, ALUCAN recycling assoc., metal merchants
Clean Kent Campaign	Pilot scheme extended to 15 centres	Toomeys Ltd Sandling
Aluminium can recycling		
CPC recovery		
<b>GRANTS AND SUPPORT</b>		
Green/sustainable tourism		SEETB, Taskforce on Tourism & the Environment
Operation Nightingale		KTNC
County Archaeological Officer		EH initial funding, then shared KCC/DCs
Cold mix recycling of road	National trials	Energy Efficiency office.
construction materials		
Cobtree Museum	Preserve historic farmed landscapes	MA, Cobtree Charitable Trust, Kent Gardens Trust
		East Malling Research Station, ADAS, KAS

KEY: ADAS: Agricultural Development Advisory Services; APC: Association of Parish Councils; AS: Ashford Borough Council; BHS: British Horse Society; BTCV: British Trust for Conservation Volunteers; CA: Canterbury City Council; CAPS 1993: First French Countryside Management Project; CBI: Confederation of British Industry; CC: Countryside Commission; CLA: Country Landowners Association; CPRE: Council for the Protection of Rural England; DA: Dartford Borough Council; DC: District Council; DO: Dover District Council; EH: English Heritage; EN: English Nature; FA: Forestry Association; FE: Forestry Enterprise; FWAG: Farmers Wildlife Advisory Group; GR: Gravesend Borough Council; HMIP: Her Majesty's Inspectorate of Pollution; KALO: Kent Association of Leisure Officers; KAS: Kent Archaeological Society; KCC: Kent County Council; KFAS: Kent Federation of Amenity Societies; KRCC: Kent Rural Community Council; KRV: Kent Rural Voice; KPOG: Kent Planning Officers Group (representing DCs); KTNC: Kent Trust for Nature Conservation; LB: London Borough; MA: Maidstone Borough Council; NFU: National Farmers Union; NRA: National Rivers Authority; NT: National Trust; RA: Ramblers Association; RDC: Rural Development Commission; RICS: Royal Institute of Chartered Surveyors; RO: Rochester-upon-Medway City Council; RSPB: Royal Society for the Protection of Birds; SE: Sevenoaks District Council; SEETB: South East England Tourist Board; SH: Shepway District Council; SW: Swale Borough Council; TH: Thanet District Council; TM: Tonbridge and Malling Borough Council; TW: Royal Tunbridge Wells Borough Council.

Sources: Elements; Kent County Council Environment Programme Medium Term Plan; Kent Countryside Forum, interviews.

Problems were experienced in developing a network which was not too dependent on the limited resource base of the Environment Team. Early ambitions for inter-District co-operation met communication and implementational problems. Causes included the lack of focused responsibility for environmental management at District level and limited County contact with Environmental Health which often took the lead at District level. Contacts between County and District departments were mostly through sectoral Chief Officer Teams with fragmented responsibilities for the environment, whilst contacts between County and District Members were more likely through spatial electoral units than shared policy interests.

The Environment Programme was established as a 'flagship' initiative for the County Council without seeking the ratification of the Districts. Members have not supported any major shift of emphasis from existing policy goals towards major environmental projects. The Environment Programme Manager adopts an approach of "exploring options to ascertain acceptability and feasibility within the overall council programme" [Gilbert/1/92], seeing the role of the Team as generating and proselytizing ideas for others to take up within policy-forming sectors of council business: a role which requires keeping abreast of proposed solutions to environmental imperatives yet holding these in patient tension with the reality of existing council priorities.

## The adoption of an Environmental Charter

Tonbridge and Malling has a population of 101,200 and extends from the North Downs escarpment in the relatively well-populated Medway Gap area west of Maidstone, across an extensive rural area of wooded Greensand ridge and an agricultural belt in the Wealden clay vale, to the town of Tonbridge on the river Medway in the south which grew up around the railway which is still important for commuters to London. The Borough Council has a Conservative majority (32, Liberal Democrats 17, Labour 6).

Tonbridge and Malling is Kent's lead council in establishing an Environmental Charter. In 1988, the former Borough Health and Housing Officer started an extensive compendium of articles from professional and local government journals on environmental auditing and 'green' policy initiatives, supplemented by examples of environmental strategy documents from a number of lead local authorities and some popular 'Green' and 'Environment' books. Conservative Party political agencies (Bow Paper, 1989; Conservative Research Department, 1990) were advising local Members to promote publicly visible environmental policies. These were the impetus to informal discussions between the Chairman of the Environmental Health Sub-Committee and the Borough Environmental Health Officer which preceded the first public proposal to progress a comprehensive, corporate environmental strategy (Table 4.3). Responsibility for drawing up an environmental strategy was delegated to an Officer Study Group which supported a Member Working Group reporting directly to Policy and Resources Committee, with technical reports on relevant sections of the emerging Charter going to other committees. The Environment Protection Act 1990 caused the Groups to focus more on waste collection, recycling and litter abatement than it might otherwise have done; indeed, the policy-making demands of the Act might have jeopardized the adoption of the Environmental Charter had it not received the earlier impetus [Batty/10/90].



### Table 4.3 Table of events in the formulation and implementation of an environmental strategy by Tonbridge and Malling Borough Council

16-8-89 Environmental Health Sub-Committee accepts recommendations of the Service Review - Pollution Control Section. The chairman suggests using the Review Report as the basis for formulating a broader corporate environmental strategy. The chairman recommends the establishment of an Environmental Strategy (Member) Working Group to work with an Officer Study Group

13-9-89 Health & Leisure Services Committee endorse sub-committee recommendations

4-10-89 Policy and Resources Committee accept proposal in principal and ask Management Team to suggest terms of reference

23-11-89 Friends of the Earth send their Environmental Charter for Local Government to the Chief Executive of all councils in England and Wales.

29-11-89 Policy & Resources Committee is presented with a list of issues relevant to a comprehensive environmental strategy and an assessment of corporate implications and timescales. Reference is made to the forthcoming Environmental Protection Bill and the Friends of the Earth Charter. The Committee recommends the composition and initial terms of reference of Environmental Strategy Working Group.

12-12-89 Council Meeting adopts policy to progress an environmental strategy and extends list of members in the Working Group.

8-1-90 Officer Study group chaired by the Borough Environmental Health Officer prepare a preliminary environmental audit based on the Environmental Charter for Local Government.

17-5-90 Friends of the Earth Local Government Campaigner sends letter asking about the Council's response to the Environmental Charter for Local Government.

1-6-90 Borough Environmental Health Officer attends AMA/LSS conference 'Auditing Our Environment'

8-8-90 First meeting of Environmental Strategy Working Group recommends 'way forward' and a timetable to develop the environmental strategy. Purchasing policy review initiated.

8-9-90 Environmental Strategy Working Group reports on the Environmental Protection Bill and a position statement toward the Friends of the Earth Charter. Recommends including health promotion issues and a litter strategy within the Environmental Strategy.

3-10-90 Policy & Resources Committee accepts report of Management Team on way forward for the environmental strategy.

15-11-90 Second meeting of Environmental Strategy Working Group recommends recycling initiatives and considers declaration of commitment and base policies for the Environmental Charter. Reports on Government White Paper This Common Inheritance.

27-2-91 Environmental Health Sub-Committee endorses recycling policy

11-3-91 Third and final meeting of Environmental Strategy Working Group reviews progress with recycling and considers proposed action initiatives for 1991/1992 and a draft design of an Environmental Charter promotional leaflet.

10-4-91 Policy and Resources Committee endorses text of Charter and arrangements for the Charters launch.

27-4-91 Public Launch of the Environmental charter in the grounds of Tonbridge Castle.

1-5-91 New committee structure adopted.

16-9-91 First meeting of Environmental Strategy Sub-Committee. Decision not to progress a health strategy within a broader environmental strategy.

2-10-91 Policy & Resources Committee consider minutes of Environmental Strategy Sub-Committee.

27-11-91 Environmental Strategy Sub-Committee decide to distribute Recycling Directory to all households, updated environmental audit based on Friends of the Earth Charter used to consider action priorities.

31-3-92 Environmental Strategy Sub-Committee selects between bids for environmental strategy funding for Action Initiatives in 1992/1993.

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Sources: Attendance at committees, minutes, Borough Environmental Health Department files

The receipt of the Friends of the Earth *Environmental Charter for Local Government* could not have been better timed for the purposes of the Officer Study Group with a limited period in which to propose issues for consideration by the Member Working Group. *The Charter* not only provided ready-made recommendations but also provided a framework for an internal audit of policies. All Departments were circulated with the sections of the Friends of the Earth *Charter* relevant to their sectoral interests. Departments generally responded positively to the recommendations although Development Services noted constraints on policy adoption, particularly on transportation issues. This highlights the problem of a locally-based environmental strategy which is not integrated into any broader strategic level of environmental planning. On the other hand, an adopted environmental strategy can be a vehicle for influencing other government bodies towards more environmentally-sensitive policies. Indeed, several representations were made to central government, Kent County Council and other bodies as a result of considering the Friends of the Earth recommendations.

Despite the key role of *The Environmental Charter for Local Government*, there was neither discussion with the national office of Friends of the Earth nor any approach from or to a local group: there being none covering the Tonbridge area. Generally speaking, local groups are based on District centres with a rather narrow geographical interest, such that the Maidstone Group had little input into policies in the contiguous Malling area. The Friends of the Earth national office perceived the written response from the Council to its letter of May 1990 as a failure to gain a signatory to *The Charter*. In reality, Tonbridge and Malling Borough Council were being prudent but not rejecting *The Charter*, rather taking it a stage further by adapting it to local circumstances, as reported to committee:

the Officer Study Group is not yet in a position to recommend adoption of the Friends of the Earth Charter by the Council, although their Charter is seen as a model example of statements on environmental action. Further careful consideration of the issues is required, including assessment of the results of the environmental audit, before firm policies are developed.

*Minutes of the Environmental Strategy Working Group [8/8/90]*

Other local authorities that more readily accepted the polemic of the Friends of the Earth stance did not necessarily weigh the implications of the detailed proposals as carefully. The Friends of the Earth *Charter* played a key role in policy derivation, with a selection of its key principles clearly reflected in the Tonbridge and Malling Environmental Charter. The Charter was launched in April 1991 after only eighteen months of committee cycle, helped by a degree of delegation which outstripped the normal protocol of committee deference so that the text and launch details were accepted almost retrospectively by the Policy and Resources Committee. The speed with which the Environmental Charter was discussed, drafted and adopted derives from a conjunction of factors:

- a) a climate of political and popular interest in speedy responses to environmental concerns;
- b) a strong and united local political will with dynamic and motivated political leadership;
- c) a political climate and local populace that demanded high profile promotion of council activities;
- d) a clear lead department which was well prepared for, and enthusiastically engaged by, the political initiative when it came;
- e) accumulated information on existing initiatives by other local authorities;
- f) a management structure geared to a progressive committee cycle;
- g) a willingness to delegate the policy formulation process to a non-public, Member Working Group working interactively with an Officer Study Group;
- h) the receipt of the Friends of the Earth *Charter* at a most opportune time of policy derivation.

The Tonbridge and Malling Environmental Charter (Table 4.4) reflected the remit of local government rather than considering the totality of the environment even at local level. Though entirely reasonable as a statement of council policy, the Charter fell short of the environmentalists' vision of environment-centred planning.

## Table 4.4 Major sections of the Tonbridge and Malling Borough Council Environmental Charter

### **Declaration of Commitment**

'Tonbridge and Malling Borough Council will promote the conservation of natural resources. The Council will minimise environmental pollution in all its own activities and through its influence over others. The Council will keep under review all its policies, programmes and services and undertakes to act wherever necessary and practicable to meet the standards set out in this charter.'

### **POLICY DEVELOPMENT**

The Council will pursue the following elements within the strategy:

#### **1. ENERGY -**

The Council will develop a policy based upon energy conservation and clean technology.

#### **2. RECYCLING -**

The Council's policy will include: cost effective collection and deposit facilities; appointment of a Recycling Officer; in-house recycling schemes; a commitment to using recycled materials and waste minimisation; close liaison with all agencies having an interest in recycling; promotion and support of community recycling facilities.

#### **3. POLLUTION CONTROL -**

The Council's plans include monitoring and minimising pollution in the local environment; taking effective enforcement action and offering advice and assistance; keeping an inventory of pollution sources; maintaining an audit of current pollution levels; encouraging collaboration and information exchange with other environmental protection agencies.

#### **4. TRANSPORT, PLANNING AND DEVELOPMENT CONTROL -**

Policies will promote fuel efficiency; the use of unleaded fuel and the fitting of catalytic converters; public road and rail transport, cycling and walking; conservation and enhancement of the built environment; control and promotion of environmentally sensitive new development.

#### **5. ENVIRONMENTAL PROTECTION AND ENHANCEMENT -**

Measures will be included to reduce litter and dumping nuisance, and to protect and enhance public open spaces, wildlife habitats, streets and other highways; develop techniques for graffiti removal and prevention; consideration of the needs of disadvantaged people; adoption of methods of land management (taking account of threatened wildlife interest) which protect and enhance the environment; promotion of organic and other methods in agriculture and countryside management in line with this strategy.

#### **6. HEALTH -**

The Council's plans recognise the links between the environment and health; will promote healthy lifestyles; seek to reduce avoidable ill-health and accidents; encourage collaboration between all agencies having an involvement in health promotion.

#### **7. EDUCATION AND AWARENESS -**

Policies will include close liaison with local groups and organisations; publishing of information; training of employees and joint trading initiatives with other bodies.

(CURRENT ACTIONS are extensively listed under each part of the strategy.)

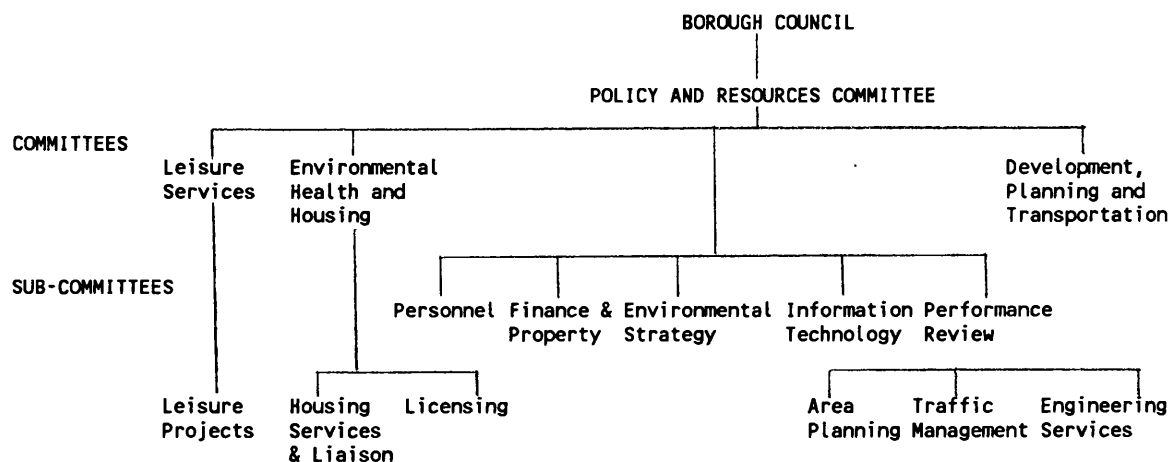
Source: Tonbridge and Malling Borough Council (1991)

The setting up of an Environmental Strategy Sub-Committee through the Council-wide re-structuring of committees occurred after the launch of the Charter. Its role was to take the policies of the Charter forward. The holistic potential of the environmental strategy was reduced by the Sub-Committee's decision to defer the

development of an integrated health strategy. The reason given was the publication of the Government's consultative document *'The Health of the Nation'* (Department of Health, 1991) but probably resulted from the distance between local government and the regional health authorities. Relatively few local authorities had adopted health strategy policy documents (Hall, 1990) and the extant examples (for example: Pike, O'Keefe and Pike, 1990; Borough Council of King's Lynn and West Norfolk, 1989) are mostly the result of the earlier World Health Organization's (1985) *'Health for All'* promotion.

Environmental Health matters dominated the agendas of the Environmental Strategy Sub-Committee although topical issues such as those highlighted in the national media and environmental group campaigns were also debated. The new committee structure caused a hiatus with considerable cross-referencing to other, including defunct, committees being necessary as policy domains were being established. Since the Sub-Committee reported to Policy and Resources Committee, it had a strategic role alongside the three main committees (Fig. 4.2). The Sub-Committee continued the 'think tank' and strategic initiative-launching role of the former Working Group. The split from the service provision role of the Environmental Health and Housing Committee had important consequences for the costing and implementing of environmental policy.

**Fig. 4.2** The committee structure of Tonbridge and Malling Borough Council



Some of its Members also sat on the Environmental Health and Housing Committee which eased communications, but with forward planning retained in the Development, Planning and Transportation Committee and environmental health dominating the Environmental Strategy Sub-Committee, opportunities for fully integrated and strategic environmental planning were limited. However, a Management Team of Chief Officers do meet formally to co-ordinate Council policy and to plan co-operative ventures.

The Environmental Strategy was only given a modest budget (Table 4.5) but with an innovatory role in Council policy. Bids were received from all services for project-based 'Action Initiatives' (for 1992/1993 the total bids amounted to £86,000). The Sub-Committee saw its purpose as choosing between these as 'Options for Action' which were exploring the Council's role on environmental issues. Action Initiatives could be used as a ploy to corner budgeted expenditure, but the central role of the Policy and Resources Committee ensured a high premium on policy justification and cost effectiveness, so that bids had to be well substantiated. On-going costs were only to be met by the committee in the first few years and then built into base-line budgets of service heads. Thus, Environmental Strategy aims become embedded within existing services.

**Table 4.5 Tonbridge and Malling Environmental Strategy Sub-Committee special estimates compared to Borough expenditure**

	Action Initiative special estimates £	Total environmental improvements £	Gross budget for year £
1990/1991	41,100	457,000	30,546,000
1991/1992	97,000	387,000	26,916,000
1992/1993	50,000	655,000	26,644,000

**Source:** Tonbridge and Malling Borough Council Policy and Resources committee minutes and Community Charge leaflets

The Sub-Committee gave first priority to improvements in waste collection. Waste collection remained under the control of the service committee but new and publicly visible new initiatives in recycling, new litter bins and the collection of household waste provided a 'top-up' to the routine (contracted out) waste collection services and were used to promote the Borough's role in recycling and waste management. Educational and community self-help schemes of litter abatement were also designed to engender an environmentally-friendly image for the local council as well as reducing cleansing costs. The Development Services Committee sought support for relatively low budget items such as a Farmstead Survey, woodland management and disabled persons access to Public Rights of Way. The response of the Sub-Committee to the funding of environmental projects managed by other organizations was surprisingly timid with £4,000 relinquished of £5,000 earmarked. Poor take up was blamed, yet a request from the British Trust for Conservation Volunteers was referred to the new, grant-awarding Finance and General Purposes Sub-Committee which was also delegated responsibility for advertising the availability of grant aid for environmental work.

One of the unintended side effects of the speedy adoption of the Environmental Charter was a lower level of external consultation than intended in the terms of reference of the Working and Study Groups. As a result, the ground was ill-prepared for the partnership relationships which were subsequently sought during the implementation of the Charter. The failure to draw the body of planners in the Development Services Department into the formulation of the Charter lost opportunities to tap their well established consultative procedures and to gain access, through the County tier of planning, to the county-wide and national network of environmental groups, many of whom have limited contacts with the regulatory function of Environmental Health.

Local Plans and the Environmental Charter were being prepared simultaneously but with little evidence of their mutual interdependence. The Environmental Charter did not penetrate the Drafts of (sub-District level) Local Plans. Fewer planning than environmental health issues were taken up in the discussion of the emerging Charter,

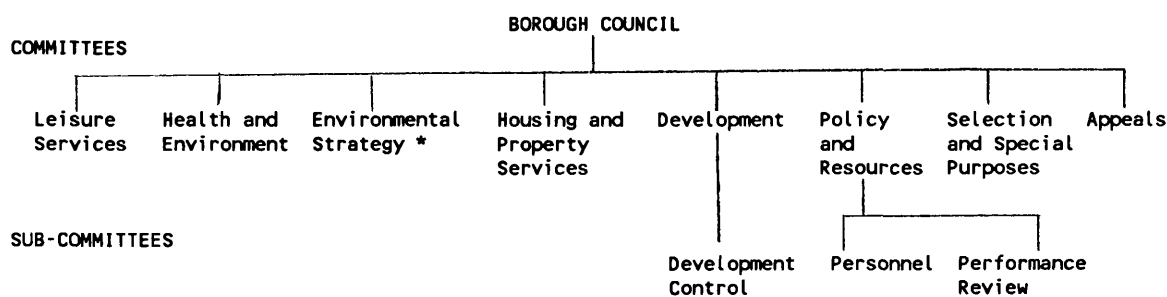
probably because the relatively autonomous Environmental Health Department took charge of the Charter, whilst the planners continued with their statutory responsibility. In producing a non-statutory document, the Environmental Health Department was free from the statutory consultation and public participation requirements of Local Plans; but may have failed to attract wider interest for the Charter from the Development Services Department because of its lower status in this regard. Compared to the complex procedures necessary for adopting a Local Plan (Bruton and Nicholson, 1987), the adoption of an Environmental Charter is relatively painless. The preparation of a Local Plan is an expensive, detailed and slow process. Since local councils have lost most of their development capability, a Local Plan increasingly has the role of regulating and enabling development by other bodies. An updated Local Plan helps to remove uncertainty for developers and avoids arbitrary decisions through the development control functions of the local authority (Healey, 1987). Clearly the planning strategy of a local authority has important environmental implications. By contrast, an Environmental Charter is a relatively simple, quickly-produced document. It focuses on the actions of the local council, and to some extent the citizenry and charge payers, and only secondarily is it aimed at outside bodies. It remains to be seen whether the guidelines contained in charters can have the same force on the implementation of policy as the formalized policies in statutory Development Plans.



## The Swale Borough Council Environmental Audit

The Borough of Swale covers the areas of Sittingbourne, Sheppey and Faversham and has a population of 117,200 concentrated in the first two centres which both have extensive industrial complexes interspersed with housing. There are pockets of dereliction and contamination but also large areas of high-grade agricultural land (forty-five percent of the Borough is Grade One or Two), forty percent of the area falls in the North Downs Area of Outstanding Natural Beauty and, with extensive marshes along the coast, twenty percent of the Borough's area is designated as Sites of Special Scientific Interest. In late 1989, the 'balanced' Council (Conservative 19, Labour 18, Liberal Democrats 12) demonstrated a strong commitment to an environmental programme by accepting a Democrat motion for the preparation of an environmental strategy. In contrast to Tonbridge and Malling, there had been little consultation with officers at this point but the Council seized the initiative with a surprisingly progressive unity and events moved quickly. Council departments and committees were being re-organized at the time into larger units (Fig. 4.3) but against this tide a small Environmental Strategy Committee was formed, reporting directly, as did the main service committees, to the Council.

Fig. 4.3 The committee structure of Swale Borough Council



\* Disbanded April 1992

The first meeting of the Environmental Strategy Committee (March 1990) decided to appoint consultants to provide an objective assessment of the local environment free from any defensiveness from departments and officers. Four consultancies were invited to present proposals for an environmental assessment within a budget of £22,000. No clear prescription was offered in their brief, but advice on best practice

was sought. Four rather different approaches were outlined. Mott MacDonald Environmental Consultants were commissioned for two reasons:

- a) they proposed an on-going system of environmental 'audit' which would not be dependent on consultants beyond the initial audit,
- b) they proposed sub-contracting some of the work to Peat McClintock Partners to propose an environmental management system.

The consultants produced an initial 'scoping' report to the Committee who finalized the consultants' brief after conferring with an Interdepartmental Working Party.

From the consultants point of view, it seems likely that the Swale Audit was a loss-making leader project [Sabin/1/92]. Considerable staff resources were invested with a different member of the consultancy working on each main environmental area according to specialization. A full eight weeks were spent across all departments of the Authority consulting a wide range of senior and junior officers and existing data and policy statements. This was followed by interviews with local industry and by field surveys. Close contact with officers was maintained throughout, with regular reporting to committee members.

Asked whether the *Swale Borough Council Environmental Audit* (Mott MacDonald, 1990) (Table 4.6) had achieved what the Council had expected of it, the lead officer [Sabin/3/91] said that they had sought a working document for assimilation into the work of the Authority but with greater integration of functions. They expected a more environmental orientation to the Council's priorities, a further heightening of Members' awareness, and a change in philosophy for staff members. In the event, these expectations were only partially satisfied through the audit. The lead officer felt that the audit was just part of a process of change consisting of evolving Council policies, new legislation and the guidelines contained in the Audit. The audit helped Members to re-focus their views of environmental problems and to challenge policy priorities. The obvious thoroughness of the exercise created a sensitivity amongst Members who insisted that the final findings were reported to the full Council in private, in case "they set loose something that would haunt them in budgetary terms" [Sabin/1/92]. In reality, few alterations were made and the recommendations were

## Table 4.6 Environmental objectives outlined in the Swale Borough Council Environmental Audit

### **1. AIR**

- . To reduce levels of air pollution to acceptable levels
- . To respond effectively to complaints on air pollution
- . To identify polluting processes where the Council has a statutory/discretionary role
- . Continue to address the Council's own activities with respect to air pollution and to encourage public and industry to do the same

### **2. WATER**

- . To take positive action to reduce water pollution in the Borough
- . To establish whether drinking water supplies continue to meet EC drinking water standards
- . Continue to educate and provide advice to the public on water quality issues

### **3. NOISE**

- . To identify and quantify key noise issues and their causes and to develop a noise data base with the intention of monitoring and improving the noise climate
- . To review the effectiveness of enforcement action and to identify action which is being or can be taken to improve conditions or meet standards
- . To ensure that potential noise problems are identified in all relevant planning applications and noise screening is included in all new road and rail developments where appropriate
- . To promote liaison and education of public and industry with respect to noise issues and to liaise with local government organisations in respect of prospective legislative changes

### **4. WASTE**

- . To continue to provide an effective weekly collection service for household waste, an 'on demand' service for commercial and industrial waste, and a programme of litter and fly tipping control
- . Continue to encourage and promote recycling initiatives within the Borough and review the effectiveness of these schemes
- . To ensure that KCC consider the long term strategic problems of waste disposal from Swale within their waste disposal plan

### **5. ENERGY**

- . To continue to reduce energy consumption in areas of Council responsibility
- . To encourage energy conservation measures by industrial and domestic users

### **6. TRANSPORT**

- . To develop priorities for transport, integrated with local plans, for the benefit of residents, workers and tourists
- . To improve consideration for pedestrians and cyclists by ensuring that all new developments enhance facilities for public transport and cyclists, by considering appropriate traffic calming measures
- . To reduce the pressure of traffic on urban centres whilst improving access to industry

### **7. PLANNING AND DEVELOPMENT**

- . To ensure that the potential environmental impacts of developments are adequately addressed by developers and that these are fully assessed when considering development proposals
- . To increase emphasis on proper enforcement action against unauthorised development and non-compliance against planning conditions and building regulations
- . To ensure up-to-date and continued Local Plan coverage for the Borough
- . To preserve and enhance listed buildings and conservation areas
- . To develop environmental enhancement schemes

### **8. NATURE CONSERVATION**

- . To produce Management Plans for all Council owned nature conservation areas
- . To encourage protection of nature conservation areas and take steps to benefit conservation interests

### **9. LAND QUALITY**

- . To identify key contaminated land sites within the Borough within the next 6 months, to establish a register of these sites and clean up all Council owned contaminated land in a timescale to be agreed
- . To promote the redevelopment of derelict and contaminated land

Source: Mott Macdonald, August 1990

accepted as reasonable and feasible. In the course of the audit, many staff had to be wooed from a defensive stance fearing the apportioning of blame for problems. Conversely, other officers feared that the consultants' recommendations might be too broad-based to have any precise impact on policy. This was unfounded with clear environmental objectives being set through more than eighty recommendations covering all parts of the Council's responsibilities.

The quality of the recommendations in the Audit varied according to the calibre of the individual consultant working in each thematic area. The final report was too weighty and technical for public release and lacked simply-stated policy direction. Departments had to identify what were statutory duties and to assign priorities amongst those for which they had powers. An important step towards publishing the Council's policy was taken when the Management Team drew out from the recommendations clearly identifiable key areas, to which they added Visual Environment which the consultants had not considered. Under these headings an Environmental Strategy was produced containing general statements of policy, an Action Plan (Table 4.7) and a public commitment to timetabled environmental policy targets. The lead officer was disappointed by the limited response of the local media to the launch of the Environmental Strategy, possibly a consequence of the Borough's lower public relations profile compared to Tonbridge and Malling, which regularly mailed residents with promotional literature and actively sought press interest. Chief officers and party leaders insisted that the Audit was not carried out for political gain, neither was it a 'flag-flying' exercise, and that the aim was to produce a medium term strategy.

## Table 4.7 The Swale Environmental Strategy: Action points

### **1. ENVIRONMENTAL PROTECTION**

- . More sophisticated air monitoring will be carried out and include determination of nitrogen oxides, sulphur dioxide and smoke as well as multi-element sampling around a steelworks at Sheerness.
- . Radiation monitoring as part of Kent's wider scheme
- . Industrial processes subject to local authority control will be identified and authorised formally in accordance with a planned timetable
- . New complaints procedures to improve customer satisfaction
- . Compile a register of contaminated land
- . Monitor coastal waters and actively seek improvement in water quality
- . Set up a Drinking Water Forum

### **2. NOISE**

- . Imposition of stringent noise conditions on planning consents
- . Effective and responsive procedures for dealing with complaints
- . Minimising noise on construction sites
- . Establishing standards for noise sensitive buildings affected by traffic noise
- . Achieve high standards of sound insulation in conversion of buildings

### **3. WASTE**

- . Produce a waste recycling plan
- . Adopt litter provisions of the Environmental Protection Act
- . Press the County Council to provide adequate waste disposal facilities
- . Reduce consumption of paper by the Council and recycle it where possible
- . Operate a reward scheme for information on fly tippers
- . Vigorously promote the "Cleaner Swale Campaign"

### **4. TOWN CENTRES**

- . Maintain pressure on the highway authority to provide town centre relief roads
- . To provide rear service roads to town centre premises
- . Carry out environmental improvement in shopping streets
- . Encourage a wider range of shopping facilities

### **5. ENFORCEMENT**

- . Support legislation which will speed up enforcement procedures
- . Strengthen the Council's enforcement staff to enable a speedier response to unauthorised development
- . Ensure through suitable publicity that the public are aware of the need for planning permission

### **6. COMMUNITY LIAISON**

- . Include environmental protection within the work of the Council's Area Committees
- . Invite community groups, industrialists and other organisations to discuss environmental matters at meetings of the area committees
- . Encourage and foster closer links with community bodies active in environmental matters

### **7. COUNCIL DATABASE**

- . Introduce a Geographical Information System
- . Extend computerisation to recording complaints, scheduling work and identifying action taken on environmental issues
- . Maintain a database of information on air and water quality, noise and other environmental pollutants

### **8. THE VISUAL ENVIRONMENT**

- . Continue with existing initiatives including the Brighter Swale Campaign, the West Sheppey Improvement Scheme and Britain in Bloom
- . Undertake new initiatives particularly targeted at tree planting in urban areas and the clearance of derelict sites and garden areas
- . Encourage the improved maintenance of public and private buildings with grant aid and the use of legal powers where necessary
- . Co-operate with local schools and the police in programmes aimed at educating the young to respect the local environment
- . Provide parking laybys on housing estates with limited on-street parking

(In addition **ENERGY** and **NATURE CONSERVATION** are included in the Action Timetable included in the published Environmental Strategy)

Source: Swale Borough Council (1991)

The more tangible benefits quoted [Sabin/1/92] from the Swale Audit experience were:

- a) a document embodying the work of the Authority, though at some cost;
- b) a stimulus towards a structured and sustained Action Plan;
- c) a platform on which to build environmental policy, specifically the potential for presenting new initiatives in the context of the Council's agreed Environmental Strategy;
- d) improvements in services and service delivery, yet contrary to some lead officers expectations, accommodated within existing working structures and not entailing re-organization of departments;
- e) a closer working relationship between Environmental Services and Planning and Development;
- f) an increase (by three) of staff in Environmental Services;
- g) more vigorous enforcement especially through planning controls and a quicker response through a computerized complaints system;
- h) the Environmental Strategy and Action Programme focused departmental efforts on achieving targets;
- i) a thorough review and re-organization of environmental monitoring by the Authority acting alone and with other regulatory bodies;
- j) progress on the 'Cleaner Swale Campaign';
- k) justification for two million pounds annual expenditure on the Environment.

Certain limitations or difficulties were cited:

- a) the process of converting the Audit by environmental components into an Environmental Strategy proved difficult, but a stimulus to it;
- b) the Audit did not enable comparisons to be made with the performance of other Local Authorities;
- c) there were considerable hidden costs to the Authority in terms of time investment by staff;
- d) the audit process led to little change in the priorities and structuring of the Authority.

An interesting contrast with Tonbridge and Malling was the disbanding of the Environmental Strategy Committee. The reason given was the completion of the Strategy, but it was acknowledged that political jealousies arose from the strategic power base of reporting directly to council. This, of course, ignores the strength of the interdepartmental brief of the Committee. The role of updating the Strategy was devolved to the performance review procedure with operational responsibility returning to service committees. The integrating focus on the environment could be lost or diluted. At present, there are no plans to roll forward the Environmental Strategy. However, monitoring facilities in place will continue to provide the environmental data to inform policy.

## Environmental policy contrasted in the three case studies

The three Councils differ in their environmental policy aims. As a result their initiatives have resulted in different outcomes (Table 4.8).

**Table 4.8** Summary of the contrasts between the three case study local authorities in their approach to environmental policy

<u>Characteristics</u>	<b>SWALE BOROUGH</b>	<b>TONBRIDGE AND MALLING BOROUGH</b>	<b>KENT COUNTY</b>
<b>Type of audit</b>	External August 1990	Internal based on Friends of the Earth	Internal under consideration
<b>Policy document</b>	ENVIRONMENTAL STRATEGY	ENVIRONMENTAL CHARTER	Environment Programme targets: in <u>Elements 1</u>
- <b>its approach</b>	Problem-orientated	Policy generation	Partnership-orientated
- <b>its outcome</b>	Technical solutions	Steer Council policy	Idea generation
<b>Lead committee</b>	Environmental Strategy Committee	Environmental Strategy Sub-Committee	Environment Sub-Committee
- <b>its status</b>	New but temporary	New and developing	New name and focus
- <b>its role</b>	Create new environmental policy	Establish Charter and steer policy	Report environmental project initiatives
<b>Political lead</b>	Strong, united lead	Co-operative	Initial idea; supportive
<b>Political implications</b>	Service committees re-established control	Non-contentious	Non-contentious
<b>Lead Department</b>	Environmental Health	Environmental Health	Corporate
<b>Other Departments</b>	Planning & Development Cross-department	Limited	Planning; Highways etc. Cross-department
<b>Publicity</b>	Limited except launch	Strong promotion	Promotion especially to Partners: flagship
<b>Consultation</b>	Through Audit (industry)	Limited	On projects; beginning on policy
<b>Partnership</b>	Limited: intended	Limited: intended	Central to Programme
<b>Impact on development plans</b>	Considerable	Limited	Integrated

Swale Borough Council faced some severe local problems of environmental degradation as well as having high quality landscape to defend. Their approach was practical and problem-orientated and they looked to external advice and technical



solutions to local environmental problems. The Environmental Strategy involved several departments and genuinely attempted to integrate policy and encompassed the Review of Local Plans which were the main means of consultation and public participation on environmental policy. Once in place, the Environmental Strategy was backed by substantial budgetary resource and clearly highlighted priorities of Council policy.

Tonbridge and Malling Borough Council's Environmental Charter had a stronger promotional element and was primarily concerned with the Council's own activities. Re-assessment of Council priorities was mostly within Environmental Health but involved the officers taking a wider view of their responsibilities and consultative position than previously. Impacts on other Departments appear to be slight though the Environmental Strategy Sub-Committee has a marginal but significant role in steering Council policy towards environmental objectives.

Kent County Council has a very different role involving partnerships with a range of different bodies including District Councils. There is a strong promotional 'flagship' element to its Environment Programme although focusing on publicly visible projects rather than on any statement of Council policy. The Programme seeks to stimulate radical changes of policy based on environmental principles but has a limited power base from which to direct the large and rather self-contained Departments which have been slow to accept the importance of the environment within their activities. The Planning, and Highways and Transportation Departments have actively supported the debate of environmental issues by inviting a wide range of interests to Forums. These are tangible evidence of the emergence of an environmental issue network and the beginning of working relationships from which policy communities are forming, especially in relation to the innovative environment-led Review of the Structure Plan.

## **CHAPTER FIVE**

### **ENVIRONMENTAL ORGANIZATIONS AND THEIR INFLUENCE ON POLICY-MAKING IN KENT**

#### **The environmental and nature conservation network in Kent**

Environmental organizations can be categorized into four basic types: landscape/townscape protection; nature conservation; practical environmental management; and environmental campaigning. Most organizations can be placed in one type but with functions overlapping other types. Many environmental organizations are represented in Kent either through County groups or local groups or through regional offices sited in Kent or in London but with responsibilities covering Kent. Natural associations develop within each of the above types but a broader environmental network has arisen in response to development pressures in Kent. Particularly important in this respect was the controversial nature of the Examination in Public of the Second Review of the Kent Structure Plan in 1988. The Review was widely perceived as being development-led in the face of strong development pressure resulting from improved transportation and Kent's strategic position between Europe and the British capital. An environmental lobby was galvanized by the co-ordinated response of English Nature (then the Nature Conservancy Council), the Royal Society for the Protection of Birds, the Kent Trust for Nature Conservation and the Council for the Protection of Rural England which built up close working relationships (Buckley, 1989).

Each organization has an office base in Kent and a national headquarters or parent body. English Nature is a statutory agency and has long established links with the Royal Society for Nature Conservation which had campaigned for the former's

establishment (Lowe and Goyder, 1983, p.155), after which its main function was as the parent body of the County Trusts. The Royal Society for the Protection of Birds is one of the oldest environmental organizations (founded in 1889) with a national membership of over 500,000 (second only to the National Trust), 30,000 of whom live in Kent. Other groups are jealous of the financial resources enjoyed by The Society and are apt to calibrate recruitment success against theirs. Their situations are not really comparable: The Society is nationally rather than locally orientated, with recruitment aided by an intrinsically appealing focus. It has a strong research base, akin to the Institute of Terrestrial Ecology. Staff, which like English Nature's have a regional rather than County remit, are predominantly technical and promotion or campaigning are not primary aims locally. English Nature is responsible for designating and notifying National Nature Reserves and Sites of Special Scientific Interest, and shares an interest in owning, managing and protecting them with The Society, leaving the Kent Trust for Nature Conservation, also the Woodland Trust, to concentrate on locally important sites. Countryside conservation interests such as the Council for the Protection of Rural England, and the Countryside Commission: another statutory agency, have a broader brief but a natural association with nature conservation interests. They, in their turn, have links with the Rural Development Commission and the Kent Rural Community Council. Amenity groups from both rural and urban areas are represented by the Kent Federation of Amenity Societies with the Kent Association of Parish Councils representing locally elected bodies. The Civic Trust and the Kent Building Preservation Trust have important roles in the conservation of buildings. Together, such organizations belong to a network, extending out from the four founder organizations, in which the environment in different ways and to different degrees is an integrating focus. Organizations differ in the extent to which they have established links with public policy-making bodies, yet all are potential participants in newly-developing environmental policy.

Selection of environmental organizations for detailed study

From the spectrum of environmental interests, four organizations were selected to study their influence on environmental policy-making in Kent. The selection sought representative organizations, firstly, from different points along the continuum from insider to outsider, secondly, with different breadths and types of interest on environmental issues, thirdly, from contrasts in group typology, and, finally, to include a statutory organization. The selection was based on an initial assessment using these criteria (Table 5.1), although the detailed studies caused a review of this assessment.

Table 5.1 Criteria used to select environmental organizations for detailed study

	STATUS: INSIDER/ OUTSIDER	INTEREST:		GROUP TYPOLOGY:		FORM: STATUTORY/ VOLUNTARY
		BREADTH	TYPE	PRESSURE OR EXPERT	BENEFIT OR IDEAS	
<b>COUNTRYSIDE COMMISSION</b>	Low profile insider	Medium to wide	Landscape protection	Expert	Ideas	Statutory
<b>COUNCIL FOR THE PROTECTION OF RURAL ENGLAND</b>	High profile insider	Medium	Landscape protection	Pressure	Intermediate (self-interest)	Voluntary
<b>KENT TRUST FOR NATURE CONSERVATION</b>	Potential insider	Narrow	Nature Conservation	Expert	Intermediate (pursuit)	Voluntary
<b>FRIENDS OF THE EARTH</b>	Ideological outsider	Broad	Environmental campaigning	Pressure	Ideas	Voluntary

Key: For Interest Type see text; for Group Typology see Fig. 3.1; for Status see Table 3.1

In refining the selection, smaller and less organized groups were excluded on grounds of their limited county-wide impact on environmental policy as were practical volunteer groups without a significant input into policy discussion. The selection did not seek diversity of interests in its own right on the grounds that this would not represent the real mix of interests which interact in environmental policy-making. The selection was necessarily influenced by existing patterns of interaction with local government since empirical studies can only be grounded in the present, and must

focus on the evolution of a policy community rather than its eventual form. More environmental groups in Kent, excluding localized amenity groups, campaign on rural issues and this is reflected in the selection. Friends of the Earth counterbalance this tendency and the larger rurally-based organizations are increasing their interest in urban environments or, at least, the interdependence between rural and urban. Whilst focusing on four representative organizations, their links to the wider network of environmental organizations are considered.

The four organizations share a general interest in the environmental policies produced by local government but differ in the specific contributions which they can offer to environmental policy-making. Their potential as participants in an environmental policy community may depend on the extent to which their own policy goals are understood within general environmental principles. If instead they are bound by traditional sectoral interests, which tend to be tightly circumscribed and pursued independently, they may not <sup>be</sup> candidates for a new environmental policy community. Membership of established policy communities may dampen enthusiasm for new policy agendas which might disrupt established privilege. Continuity of privilege may be important if the environmental challenge is met through adjustment of existing policy communities, but if an issue network, rather than these communities, proposes radical but effective solutions then progressive policy-makers may seek new policy community partnerships.

## The role of the Countryside Commission

The Countryside Commission's main role is as adviser to central government. However, the effective implementation of many of The Commission's policies depends on the actions of local government, especially through the planning system, and the activities of land owners and other users of the countryside (Fyson, 1992). Previously, The Commission has worked primarily with County Councils, or National Park Authorities:

- a) as partners in negotiating countryside designations, with the Counties collating the responses of Districts within their area;
- b) as originators of rural and countryside policies through Structure Plans and Countryside Strategies;
- c) as agents to administer countryside projects that are grant-aided by The Commission.

This approach is challenged by gradual shifts of planning responsibilities from County to District councils, particularly the new emphasis on District-wide Local Plans and, in metropolitan areas, Unitary Development Plans which may become the norm following any local government re-organization in the mid-1990s. A focus on smaller units of local government is consistent with the evolution of Commission strategy away from new countryside designations to advising on policy within existing designations and rural landscapes generally. These trends put pressure on the casework capacity of The Commission which has responded, nationally, by directing standardized policy statements specifically to lower tier and unitary planning authorities (Countryside Commission, 1987; 1989; 1990; 1991a,b) and, regionally, through organizing seminars for local authorities and by a modest growth of staff, though supported by short-term rather than base funding.

The Commission is accountable under Treasury rules for the grants it approves, with a requirement to monitor and inspect work done. Since grants to cover small-scale projects, such as the production of new display boards by a local amenity group, could not be administered by their small staff, The Commission favours grant-aid on a relatively large scale to agents, such as county planning departments, who allocate the

grants and involve The Commission in monitoring through representation on the steering committee. The Commission's grants are increasingly being used as a proportion of costs towards programmes of work, often involving voluntary labour, rather than core funding of new schemes. This is a deliberate policy switch away from capital funding for Country Parks, or other 'honey pot' schemes, towards funding for wider access and community involvement in countryside projects (Countryside Commission, 1991c).

### Kent's countryside and the influence of the Countryside Commission

Although some of the more dramatic escarpments of the North Downs are in Surrey, such as the Hog's Back and Box Hill, the area covered by the North Downs Area of Outstanding Natural Beauty broadens eastward across Kent as the cuesta widens. The more recently designated High Weald Area of Outstanding Natural Beauty is mainly in the Ashdown Forest area of Sussex but extends into south west Kent. Metropolitan Green Belt overlaps these designations and imposes development constraint over considerable areas of west Kent.

The Kent Countryside Strategy has been agreed across local government tiers and departments and with voluntary bodies, countryside agencies and the private sector (Kent County Council, 1990). The Strategy co-ordinates functions such as countryside recreation which involves: highways authorities responsible for footpaths; leisure services departments; grant-giving bodies such as The Sports Council and the Countryside Commission; planning departments who regulate leisure development; and the, often conflicting, interests of voluntary bodies such as the British Horse Society, the Ramblers Association and the Trail Riders Fellowship.

The Countryside Commission's South East Regional Office covers ten counties and 120 districts through six area policy units, each with a three officer team. One policy unit covers Kent and Surrey and is staffed by a senior countryside officer, a

countryside officer and a countryside stewardship officer. Despite the job specifications, the team tend to share their principal duties:

- a) commenting at consultation stages of statutory plans and on other documents relating to the countryside;
- b) considering submitted planning applications;
- c) administration of grants for countryside projects.

Commenting on draft plans involves checking that:

- a) there is no inappropriate development within any Area of Outstanding Natural Beauty;
- b) the plan addresses countryside issues consistently through all parts of the plan, especially that no hierarchy of policies (for example, economic and tourism policy) overrides countryside policies without textual safeguards;
- c) stated policies explicitly tie in with issues such as recreation and Rights of Way where The Commission champions policies which go beyond statutory obligations;
- d) there is adequate promotion and acknowledgement of Commission -funded projects in the area.

Written comments aim to make positive suggestions, consonant with The Commission's promotional style and often referring to specific Commission policy. Policy re-drafting is not attempted as the Commission boasts few professional planners at regional level.

For Kent, the policy unit considers about fifty to sixty planning applications per year which have been submitted to The Commission as statutory consultees. They cover applications falling within, or close to, designated areas, and major development proposals, including those requiring an Environmental Statement, which threaten the wider countryside such as a whole new road scheme, an airport or a power station. Site visits are made to assess the landscape context of the application, using standard Commission procedures (Countryside Commission, 1988). In the majority of cases, the national perspective of Commission policy is not compromised and no comment



is filed. The staff would choose to monitor a wider tranche of planning applications as a means of supporting The Commission's broad countryside policies, but limited resources prohibit this option. Regionally-organized statutory bodies such as The Commission, English Nature, English Heritage and the National Rivers Authority have no inherent power over decision-making in the planning process and meticulously avoid taking sides on local planning issues as this would encourage interested parties to claim them as allies.

The Countryside Commission gave Storm Damage grants in the wake of the 'Great Storm' of 16/17 October 1987 (Raine, 1989) to support landscape rehabilitation projects. A Kent County Council Storm Damage Officer was fully funded to administer grant-aided projects through Task Force Trees. A particularly successful scheme in Kent has been the small woodlands advisory project 'Trees for Kent'. Landscape Conservation grants were designed to encourage the restoration, not routine maintenance, of features such as hedgerows and ponds. Lack of base-line data on countryside resources and landscape features for monitoring such projects prompted The Commission, in 1991, to fund a two-year post in the County Planning Department for analysis of countryside change, using aerial survey information.

The recent Countryside Stewardship Scheme (Countryside Commission, 1991d) provided the opportunity to recruit the full-time Countryside Stewardship officers to the Regional Office. Their primary role is as advisors to land owners, with a small inspection element, equivalent to the Agricultural Development Advisory Service (Eldon, 1988; Walford, 1988). These new posts have been integrated into policy units through shared duties rather than retaining specialist responsibilities, with the hope of justifying the staff increment beyond the initial three-year contracts. The scheme aims to restore historic farmed landscapes. There is little overlap with English Heritage who grant-aid Grade 1 Parks and Gardens of Historic Importance on their (non-statutory) register but they are consulted over design at the planning stage. Traditional and historic landscapes are also covered by the Task Force Trees programme of clearance and tree planting, with restoration attracting seventy five percent of an owner's costs.

Countryside Management, especially in urban fringe locations, is a long-running initiative of The Commission (Countryside Commission, 1978). The North West Kent Countryside Management Project is one of only three in the South East established by The Commission; the others being in Hertfordshire and the Colne valley. The Commission no longer initiates countryside management schemes but relies on local government agents, especially county planning departments, to co-ordinate management and to establish new schemes (County Planning Officers Society, 1989). New initiatives in Kent include the Thames-side Countryside Management project which is run by Groundwork, drawing on labour from the voluntary sector, being directly funded by the Department of the Environment, and adopting a high profile approach to attract business support for schemes of environmental enhancement. The White Cliffs, High Weald and River Stour projects combine County and District funding with a Commission grant and rely heavily on the British Trust for Conservation Volunteers for conservation work. The Trust, like the Kent Rural Community Council, has an important role in administering and monitoring grant use by the wealth of voluntary organizations (Cowell, 1990; Hale, 1987) directly involved in environmental management which extends well beyond traditional countryside management. The Trust attracts funding from other sources, notably the Shell Better Britain Campaign, and is able to support many community-led organizations which contribute voluntary resources to environmental enhancement projects in rural and urban areas.

The role of the County Wildlife Trusts as partners in Countryside Commission projects (Bull, 1988) has depended on the extent to which they can combine their nature conservation objectives with the access requirements of The Commission's grants. The Surrey Wildlife Trust, for example, has found it difficult to reconcile its key objective of conserving heathlands with greater access because of fears of damage by fire and trampling. By contrast, Operation Nightingale run by the Kent Trust for Nature Conservation actively promotes tourism on sites of conservation interest that are considered sufficiently resilient to visitor pressure. Further grant support is provided from the County Economic Development Department for its promotion of sustainable tourism. An important part of the promotion includes the provision of

interpretive facilities and visitor centres to promote the virtues of considerate use of the countryside and respect for wildlife conservation.

### Partnership in policy-making and its implementation

Local government is increasingly hungry for funds of the sort available through grant-aided bodies such as the Countryside Commission and the Rural Development Commission (Minay, 1990). Equally, such bodies can bolster their own objectives by supporting successful projects. The recent competitive interest shown by local authorities in the establishment of Community Forests as a means of achieving regeneration (Johnston, 1991) may have more to do with attracting scarce funds than any fundamental commitment to afforestation. Environmental enhancement through the East Thames Community Forest project at Thurrock and Countryside Management projects in North Kent may prove to have an important role in the East Thames Corridor vision for re-directing growth pressure from the West to the East of London (Planning, 1992).

The Countryside Commission exemplifies the benefits gained from partnership in policy-based initiatives. The view held is that "if the policy is sorted out the local planning authority should then get it right at development control level"; equally the benefits of fostering good relationships are espoused: "if we get it right with the planning authority they will take on board what The Commission says", so "in lobbying our point of view, we make it clear that our aim is not to halt development but to see that it does not detract from the quality of a designated area or the wider countryside" [Burke/10/91].

In contrast to many voluntary organizations like the Council for the Protection of Rural England, The Commission is relatively slow in the development of new policies. In this regard, its unwillingness to comment unless existing policies are involved limits its usefulness to local government faced with the need to react to novel pressures. For example, the recent rash of planning applications for golf

courses has unearthed a policy vacuum (Chatters, 1991). Contradictory views are held on the landscape impact of relatively large-scale golf courses if only because of the professional gloss of landscape design used to promote a development. Nature conservation groups have discovered benefits for habitat creation and preservation compared to the 'green desert' syndrome of agricultural intensification (Nature Conservancy Council, 1989). But these developments straddle the boundary between acceptable and non-acceptable developments: they meet the criteria of appropriate recreational activity in a multi-functional countryside (Countryside Commission, 1989) yet may not meet others such as access which can be severely restricted by fees, or by danger on any public footpath crossing the course. Planning decisions set precedents, and the violability of all types of countryside designation are being tested by applications. Yet the Countryside Commission has no guideline policy for golf courses. The Sports Council doubts the self-sustainable nature of many of these courses and the sheer number of applications threatens the viability of individual courses unless they expand, using their considerable land holdings, into multi-sports and leisure complexes (Sports Council, 1989). This is feared by many environmental organizations as a stage towards creeping development of a discordant scale. Examples in Kent suggest that mobile, international capital is behind many of these ventures which target nodes in the transport nexus capable of attracting large numbers of people, inevitably putting pressure on rural neighbourhoods.

Despite a broadening of policy, The Commission still relies on the weight behind nationally significant designations as a lever to influence local planning authorities and as a basis for insisting on high quality and appropriate development. The Commission is generally more favourable towards 'appropriate' development in Green Belt areas than in its own designations: Areas of Outstanding Natural Beauty and Heritage Coasts.

## **The Council for the Protection of Rural England and local government in Kent**

The Kent County Branch office is based at Wye and has two paid staff: a Conservation Officer and a part-time clerical assistant, and is run by an executive committee. The Conservation Officer has two main roles:

- (1) providing, collating and disseminating comment on planning matters influencing the countryside of Kent;
- (2) Branch development, including enhancing the reputation and resources of The Council by recruitment, advertising and press releases.

The Conservation officer is helped in his task by volunteers, especially the team of sixteen District Representatives. There are no district-level groups as such, so that Branch activities are centrally planned and local members mainly contact each other at County level meetings and social activities, or through shared membership of other organizations such as local amenity groups. The County Branch does not have a strong co-ordinating role, in contrast to the Surrey Society. In Kent, this is performed by the Kent Federation of Amenity Societies.

The Branch office and the District Representatives receive Planning Lists each week, with all Kent Planning Departments fully co-operating. Most Representatives reported visiting their local planning office once or twice a month, with several reporting that they perused over a hundred planning applications in a year. Site visits were made where necessary. Reports were then sent to the Conservation Officer, two thirds of which resulted in letters to the relevant planning authority. The main points raised concern landscape impact, loss of amenity and traffic hazards, mostly set in the context of Structure and Local Plans and protected areas. Where appropriate, positive comments were returned which highlighted The Council's support for certain policies and related decisions. Occasional letters were sent or copied to the County Council or the Department of the Environment. Particularly controversial and large scale developments were referred to national office who only became involved if key precedents were evoked.

From a questionnaire survey of District Representatives (Appendix 1), which elicited a sixty percent response rate, three issues were repeatedly raised: excessive road building, especially by-passes (60%); golf course proposals (45%); and development granted outside of Development Plan policies (90%), especially on greenfield sites. Other issues raised were the Channel Rail Link, water shortages, quarrying, refuse disposal, threats to landscape designations, farm diversification, design and countryside management and access. The Representatives were well informed on planning policies and mostly had personal contacts with planning officers, two mentioning contacts with other departments. Contacts with councillors (one was a councillor) were mentioned in sixty-five percent of the replies, in some as of crucial importance, in others as incidental to the primary contact with officers. Interestingly, Representatives were members, or in contact with, an average of four environmental or amenity organizations, yet recorded little contact with other individual members of The Council. Several felt that they were able to take a wider view than many local societies, but found it difficult to gauge the impact of their representations as a wider articulation of local opinion was necessary to influence policy. On development generally, the Representatives' comments ranged from broad antagonism, with a firm belief that developers controlled councils rather than *vice versa*, to satisfaction with local policies, with a clear preference for confining development to recycled urban land and on a restricted scale within village envelopes. Several Representatives mentioned the recession as the single most important impact on development rates and some felt that the 'greening' of their local council was succoured by these circumstances.

The County Branch has built up strong connections with the planning system, especially with the County tier. As a result of reasoned argument based on sound planning knowledge, often provided by retired planning officer members, The Council's views were respected and taken into account in planning decisions. Relationships with the County Council were strained during the preparation of the Kent Structure Plan (1977) and, by the time of the Second Review (1990), The Council was in marked disagreement with the County Council over a number of policies. The Council grew in stature in the environmental movement by taking a

lead role in challenging the policy balance, often jointly with the three nature conservation organizations. The Council's national office was also heavily involved as the Review was regarded as setting nationally important precedents. The Council, following its accustomed approach of reasoned consultation, entered fully into the public consultation exercise and was represented at most stages of the Examination in Public. Strong objections were made on a number of key policies as their perception was that "the Kent Structure Plan was nationally one of the worst drafted on environmental issues" [Burton/9/90]. Detailed representations gained some concessions from the County Council but severe disappointment was experienced when the Secretary of State for the Environment failed to further modify the wording of policies despite The Council's very extensive written and verbal evidence. The Council claims that it was the most detailed submission ever presented by a voluntary body: "we put a lot of work into it." [Bates/2/92]. Asked his view of the Second Review, the Conservation Officer's rather guarded answer was: "Not fantastically good. Its basis was: 'We want development in Kent which should fit into the environment if it can', whereas at the pre-discussions for the Third Review the new emphasis was: 'We want a good environment in Kent and development where it can fit into the environment without damaging it'." Asked: 'why the change?', he referred to a sea level change in public opinion and the impact of *This Common Inheritance* (Department of the Environment, 1990) "which started the ball rolling, though the ball didn't roll very far?" [Baxter/11/91]. One of the clearest indications that the environmental policy community had been conceived was the formalization of these pre-consultation meetings prior to the drafting (1992) of the new and leading Environment section of the Third Review of the Kent Structure Plan (Burton, 1992).

The Council also strives to influence public opinion. Most campaigns are instigated by the national office whose staff have generated many new campaigns over the last few years. The County Branch felt under some pressure in their attempts to respond. Campaigns often have media exposure as their aim. Recent successes include interviews in dried up river beds such as the Darent following recent drought and abstraction pressures (Council for the Protection of Rural England, 1991), and coverage of campaigns on water provision as a constraint on development, pollution

of rivers, roadside verges and provision for golf.

The Kent County Branch has strong liaison links with other environmental groups at officer level, most strongly with the Conservation Officers of the Kent Trust for Nature Conservation and the Royal Society for the Protection of Birds. Shared offices also provide ready contact with English Nature. The Kent Transport Action Group was mentioned as a significant forum for exchanging viewpoints with a range of other organizations.

The Council formed a partnership with the Kent Trust for Nature Conservation to monitor the impact of the proposed High Speed Link to the Channel Tunnel (Holliday, Marcou and Vickerman, 1991). They funded a liaison officer to forge contacts between environmental organizations, British Rail, Kent County Council and affected District Councils. Both partners achieved a high profile during widespread public debate, The Council, in particular, noting a surge of membership over the issue (McCormick, 1991, p.155). Campaigning for adequate environmental appraisal, and for assurances of mitigating measures, united an environmental policy community in the form of the Kent Action Group which involved environmental and amenity groups, representatives of local government and Members of Parliament. Strong representations were made to British Rail and to other Members of Parliament in opposition to an intended Private Bill.

Awareness of government and agency initiatives is important to The Council. The Kent Branch, in association with the Farming and Wildlife Advisory Group (Cox, Lowe and Winter, 1990), has recently encouraged farmer members to join the Countryside Stewardship scheme, with some success claimed. When asked if there was any special effort to recruit farmers the answer was: "We want everyone, but we have a long way to go with a Kent Branch membership of 2,400 from a County population of 1.5 million" [Baxter/1/92].

Asked about contacts with Friends of the Earth, the emphasis was placed on differences of approach: "our style is to influence through the proper planning process



which provides opportunities for public consultation" [Baxter/11/91]. The professionalism of this approach was contrasted with the placard-carrying of Friends of the Earth. Any similarity of campaigning style was played down, even following reference to The Council's media-attracting exercise of being interviewed in dry river beds. The simultaneous distribution of leaflets giving information on how to act on encountering a dry river bed was seen as a perfectly acceptable means of raising public awareness and was not linked mentally with a Friends of the Earth campaigning style. Despite this unwillingness to be bracketed with Friends of the Earth, the comment was volunteered that: "Each group has its own strengths. We respect Friends of the Earth, especially in their research into pollution. We regularly refer enquiries about pollution incidents to them or the National Rivers Authority. We are part of the network mafia and communication channels are important to all of us." [Baxter/11/91].

The County Branch remains a relatively small and poorly-resourced pressure group relying on its established insider status in relation to the planning system. This role comes to the fore at Structure Plan Reviews when The Council's expertise in planning matters is valued by other environmental organizations. The Branch has moved somewhat tentatively into higher profile campaigning, through which a number of partnerships with other environmental groups have been established.

## **The growth in influence of the Kent Trust for Nature Conservation**

The Kent Trust for Nature Conservation was founded in 1958 as a registered charity and grew steadily to become one of the best financed County Trusts within the Wildlife Trust Partnership (T. Smith, 1990) with an annual turnover close to one million pounds, including significant invested legacies. Sponsorship income is now vigorously sought by a fund raising manager. Measured by staff numbers (25), The Trust is the largest Wildlife Trust. Membership appears to have levelled off with a small decrease to 9,200 in 1992 after steady growth from 4,500 in 1980 and 7,500 in 1985. This membership plateau was cited as a reason for the proposal to change the name to the Kent Wildlife Trust in harmony with many other County Trusts: a new name would have broader appeal beyond the mainly middle class and middle-aged membership, and more clearly express The Trust's aims in contacts with the public and the media. The proposed name narrowly failed to attract the seventy-five percent vote required at the Extraordinary General Meeting [21-2-92] despite the clear preference of the staff members, in contrast to the long-serving executive. The costs of altering signs and a disinclination to accept the broad and 'cuddly' image of wildlife emerged as the main reasons to reject the change. In a survey of members (Kent Wildlife Focus, 1991), sixty-five percent (of 995 replies) admitted joining purely to register their support for nature conservation in Kent rather than for any active involvement in Trust activities. The substantial increase of annual subscriptions in 1992 (£22.50 for a family) will test the resilience of the members in their support of local nature conservation, as well as The Trust's aim to increase membership to twenty thousand.

The main thrust of The Trust has been the management of nature reserves: by 1992, forty-one reserves covering 1,600 hectares were owned or managed. A Green Team of conservation volunteers is organized into six area teams, each with a Sunday work programme alternating between a set of reserves. The more localized British Trust for Conservation Volunteers centrally collate work-party programmes to avoid clashes with Kent Trust reserve days, allowing the keener volunteers to work at many sites. Joint membership of groups, especially at committee level, helps to maintain the

volunteer network. Volunteers are recruited by circulating work party programmes and contact telephone numbers to registered groups, voluntary service bureaux and libraries. Teacher members and scout and guide leaders introduce youngsters to practical environmental conservation especially through the community service component of the Duke of Edinburgh's Award Scheme. The two Trusts have a strong stake in community involvement and many of their practical activities provide access to wildlife reserves and interpretation facilities. As a result the Trusts are perceived in a public service role which resonates with that of local government and other agencies and is conducive to the formation of partnership relationships.

The Kent Trust for Nature Conservation has long recognized the importance of education to wildlife and habitat conservation and has expanded contacts with schools and manned displays at public events. Local groups organize lectures and reserve open-days which attract both the public and the wider membership, some of whom may then become involved in conservation tasks. Membership of Kent WATCH, the junior wing of the national body, stands at 2,000. It is run by voluntary leaders and often involves parents. Visitor centres, including the new County headquarters at Tyland Barn, north of Maidstone, are a further means of spreading the message and attracting members. The ability to recruit high quality staff is reflected in the successful publication of teacher packs and educational books by the Education Team. As local authorities recognized the need for public education, both to justify their environmental policy initiatives and to achieve behavioural support in implementation, they were attracted to existing initiatives and publicity networks available through groups such as The Trust. This further enhanced The Trust's reputation in the eyes of local government.

In addition to these two roles of nature reserve acquisition/management and education, The Trust provided advice on nature conservation to local authorities and landowners; championed ambitious county-wide habitat surveys; and became more involved in the development planning process. These roles placed greater demands on the capacity of the organization but also gave it a high profile in the county and local-level environmental movement.

The advisory role of The Trust has expanded dramatically as it has become recognized as a source of information on nature conservation by local authorities, landowners, companies and members of the public. In the mantle of advisor, The Trust is able to influence decision-makers. The Trust has several advantages in fulfilling an advisory and consultative role. Firstly, The Trust has sufficient staff for advisory work, some of which becomes self-financing and leads to further staff recruitment. This contrasts with English Nature's relatively thinly-spread staff whose advisory role is focused on national rather than localized issues. Secondly, The Trust provides advice relatively cheaply, compared to commercial environmental consultants, because of its charitable and voluntary basis and because of the perceived non-financial rewards of providing advice on benefits to wildlife. Thirdly, The Trust is primarily a non-campaigning group, so approachable as a neutral body by local government and by companies and landowners. Fourthly, The Trust has a relatively focused expertise based on site management for nature conservation which can be offered without contradicting development proposals, except where these are particularly damaging to existing wildlife. And fifthly, The Trust's knowledge is focused at County scale and downwards so it can set its advice on specific sites in an appropriate local context.

These advantages provided The Trust with a strong base for promoting its advisory role. However, growth in demand for its services put strains on the organization and raised questions of the relative priority of its strategic tasks. There is always a danger of a rift between the demands on The Trust's resources for providing advisory services and the demands of the traditional core activities of reserve management and environmental education. Another tension is between the benefits of promoting The Trust as a consultancy as against an independent public voice for nature conservation. Too lucrative a consultancy role could deflect attention from broader environmental issues and threats to Kent's wildlife by focusing expertise into site management which could be manipulated to provide credibility for development proposals. Similar tension exists between pragmatists who can point to some success in introducing nature conservation into decision-making through involvement in a policy community, and the more radical wing of the environmental movement who regard these

concessions as cosmetic and who would support more confrontational campaigns for stronger safeguards for wildlife at the expense of certain developments or their preferred locations. Such issues are a matter of live debate amongst the staff of the Trust. Their resolution affects the extent to which The Trust can rely on maintaining an insider status in a policy community which includes landowners, developers and local planning authorities.

### The Kent Trust for Nature Conservation and the greening of Kent businesses

Partnerships with corporate bodies and businesses have produced funds for The Trust by direct sponsorship and advertising revenue. Partnerships extend The Trust's network of contacts and provide in-roads for influencing bodies which impact on the environment, either by land ownership or through their activities. The Trust has provided environmental consultancy services to its corporate members. For example, the 1990 survey of the ecological value of seventy Southern Water sites led to management changes, such as the planting of native trees, the provision of nesting sites, an altered mowing regime and the changed management of water bodies. This was followed by a similar survey of sewage and water treatment works in 1991. Another contracted survey was conducted for the National Rivers Authority (Thames) towards an integral management plan for the Thamesmead-Crayford-Erith wetlands and associated dykes with their rich aquatic flora. Children's activity books and project packs have been produced for corporate customers such as SEEBOARD, P&O Ferries, the Whitbread Hop Farm and the White Cliffs Countryside Project, and even English Nature for its National Nature Reserve at Wye and Crundale Downs. Help was also given to the newly established Thames-side Groundwork Trust through site surveys in Gravesham and Dartford. The aims of Groundwork include the restoration of derelict land: since not all management options adhere to nature conservation principles The Trust has a strong motive to influence decisions at the outset (Bradley, 1986; Department of the Environment, 1987; Groundwork Foundation, 1986).

In 1990, a corporate membership fee for companies of £250 was introduced and thirty five founder members had joined by the end of 1991. The two way benefits of the scheme were recognized from the outset: "The scheme has been designed not only to strengthen the link between business and conservation, but also to enhance the environmental image of the individual company concerned." (*Kent Wildlife Focus*, 1990, p.10). The potential problem of conflict between the policies of the corporate body and those of The Trust has not yet surfaced, and no clear policy is operated:

in our eagerness to build relationships with business and industry, we have not overlooked the difficult matter of the ethical implications and the inherent dangers to our values and beliefs in associating with companies whose policies and practices may clearly be in conflict with our own aims and objectives. There are no rigid guidelines, we must make a balanced and fair evaluation in each and every case but, ultimately, we have no intention of putting our integrity, as conservationists, up for sale.

*Kent Wildlife Focus*, 1990, p.10.

The Trust limited public criticism in return for continued access to corporate decision-makers, although no clear policy was admitted. This accommodating approach was epitomized by a response on the Channel Tunnel Rail Link to British Rail (not a corporate member): "We cannot advocate or dismiss any of the routes. What we must do is make sure that BR looks deeply at the impacts of each. Rather than obstruct BR, what we want to do is to help ensure that the line follows the least damaging route and incorporates all that is feasible to minimise wildlife losses." (Cameron, 1991, p.3). The benefits of actively involving corporate members in nature conservation were felt to outweigh any disadvantages. In 1991, The Trust launched its *Green Account* bulletin for distribution to corporate members and most major businesses in Kent. It informs the economic sector of nature conservation issues and invites feedback to nature conservation interests. The first edition was sponsored by Coopers Lybrand Deloitte who could use the platform to publicize their recent specialization in environmental auditing within their business advice portfolio.

## County habitat surveys

Habitat survey has provided The Trust with a sound knowledge of the wildlife resource of Kent and targets for its reserve acquisition strategy. This information is sought by planning authorities for policy development and for evaluating the environmental impacts of development proposals. The first habitat survey was carried out in the early 1960s by two leading members who identified one hundred sites of special natural history interest which became the basis for The Trust's reserve acquisition policy. In 1983, the Trust launched a five year county-wide survey by volunteers and a consultant from the Kent Field Club to identify Sites of Nature Conservation Interest. Four hundred and fifty were eventually listed under Grades One and Two and cover eight percent of Kent which are in addition to National Nature Reserves or Sites of Special Scientific Interest which cover a similar area. The Trust aimed to contact all owners to encourage sympathetic management and all local authorities to seek recognition for the designations through Local Plan policies. Both aims have largely been successful. The Trust also initiated an Ancient Woodland Inventory which further broadened habitat knowledge.

The latest county-wide survey was started in 1990 as a three-year Phase 1 Habitat Survey (Nature Conservancy Council, 1991), which had previously been completed for many other counties, using a survey and coding procedure devised by English Nature. It is co-ordinated by a partnership of bodies who will use the information: Kent County and District Councils, English Nature, Kent Trust for Nature Conservation, National Rivers Authority and British Rail. The survey is labour-intensive with a team of five working in each District, coding categories at field or sub-field level. Woodlands are classified by composition and 'naturalness' and rich and poor hedgerows are distinguished by composition and intactness. Sites of conservation interest are recorded in more detail including their management and a plant species list. Results are recorded on colour-coded 1:10,000 maps and transferred to a Geographical Information System in the County Planning Department for eventual electronic transfer to District systems. The survey provides an environmental assessment with the potential for guiding development proposals

away from sensitive sites, although always with the danger of stimulating the destruction of nature conservation interest by unsympathetic owners intent on developing their land. This has led the nature conservation movement to appeal to Parliament for local authority Conservation Orders, equivalent to Tree Preservation Orders but applied to whole habitats.

The Trust has demonstrated the ability, with appropriate sponsorship, to organize County-wide surveys which are beyond the staff of local authorities, and which are more site specific than the species monitoring schemes promulgated by more academic bodies such as the Botanical Society of the British Isles and the Institute of Terrestrial Ecology's Biological Records Centre and followed by natural history clubs such as the Kent Field Club. The surveys produce data in a form which can be applied pragmatically and universally to guide decisions. It avoids the pitfalls of arguing for site safeguard to protect an apparently insignificant rare species. As a result The Trust has an expertise which is both useful and accessible to public policy-makers and yet sufficiently specialized to remain within The Trust's control, so justifying their position in an environmental policy community.

### The Kent Trust for Nature Conservation and the planning system

Involvement in issues of development planning inevitably brings The Trust into the arena of pressure group campaigning. The Trust employs a Publicity and Promotions officer to co-ordinate press releases, which have a remarkable ninety percent success rate from about seventy press releases per year, and between forty and sixty radio and fifteen television interviews each year. The Trust has avoided confrontational or public spectacle campaigning, preferring educational and advisory approaches, established consultation procedures, and formal objection to development proposals where wildlife interests are compromised or neglected. The Trust has screened as many as 35,000 planning applications in a year through the monitoring of planning lists by a volunteer at headquarters. These are checked against nature conservation site designations although impacts on other open spaces are also considered.



Objections are lodged to developments which infringe on Trust reserves or which are likely to damage sites of known conservation importance. This activity is highly centralized and does not use The Trust's network of over sixty village contacts.

The Trust is recognized by all local planning authorities in Kent as a consultee in plan formulation, specifically in relation to Sites of Nature Conservation Interest, but also more generally (Buckley, 1989). The Trust is sensitive to its standing with local authorities and avoids histrionics:

We are very selective in our objections and will only oppose an application where we could, if necessary, defend our objections at a public inquiry. More often we just suggest how a development could be made more environmentally acceptable. Our credibility with local authorities is vital if our comments are to be taken seriously .....

Our resources are severely stretched by this endless tide of planning work. Sometimes we have to compromise and in the interests of diplomacy we will forego what could be beneficial publicity. It can be a depressing business because we do not always win and sometimes a win is just a stay of execution. There is satisfaction though in the knowledge that we have saved some precious sites and perhaps as important, begun to change the attitudes and perceptions of planners and developers alike.

*Kent Wildlife Focus Bulletin*, 1990, p. 1.

This conciliatory and reasoning approach characterizes the staff of The Trust. It appears to be borne of a certain resignation over the forces of change, laced with a strong confidence of the sanity and eventual triumph of the conservation argument. It is difficult to gauge from responses whether this attitude stems from the strong executive control of the staff, or their staff selection procedures, or from an abiding office aura. These qualities are consistent with an insider status in policy communities.

At County level, The Trust is consulted directly on nature conservation issues, especially through the County Ecologist, and was invited to the Countryside and Transport Action Forums which debate much wider issues, and to pre-consultation meetings on the Environment and Countryside sections of the Structure Plan Review. At District level, most consultation is by normal public participation, with some

stronger contacts, such as employment of The Trust as consultants in environmental assessment (Swale), in surveying urban nature conservation sites (Vincent and Marshall, 1991) for protection in the Local Plan (Tunbridge Wells), in commissioned nature trail literature and interpretive displays (Tonbridge and Malling) or in the grant of core funding to Trust activities (Gillingham).

The Trust is involved in a policy community which combines County and District authorities in projects such as countryside management and habitat survey. Such initiatives provide the pretext for introducing nature conservation issues into policy formulation. In some Districts, an economic regeneration policy community has predominated to the exclusion of environmental priorities, however, the conception of environmental rehabilitation as a means of improving economic attractiveness has produced new partnerships. For example in Dover, the District and County are partners in the White Cliffs Countryside Management Project involving community volunteers and wildlife organizations (Roome, 1991), and in the town centre IMPACT scheme with the Civic Trust and amenity groups (Atkinson, 1990a; Bishop, 1983; Roome, 1990). Shared goals could lead to the development of an environmental policy community with higher priority given to environmental considerations in the Local Plan or through an Environmental Strategy.

#### The Kent Trust for Nature Conservation and the environmental movement

The validity of The Trust's boast that it is the "the county's leading conservation organisation" (Kent Wildlife Focus, 1990, p.10) hinges on the exclusive or inclusive nature of the term conservation, set against other terms such as countryside, environment and preservation, and on the extent to which The Trust takes the lead in co-ordinating conservation activities. Comparatively few environmental groups or agencies operate specifically at County level. The Council for the Protection of Rural England has a countryside and landscape brief which, arguably, subsumes the nature conservation focus of The Trust. Amenity societies operate under the umbrella of the Kent Federation of Amenity Societies. Together they cover much of Kent but

they are normally individually focused on settlement units rather than landscape units, with the exception of the Weald of Kent Preservation Society which is campaigning for a 'Low Weald' landscape designation to protect a number of rural villages. Groups such as Friends of the Earth now cover much of the County at District level but lack County level co-ordination and retain a stronger focus on national or international campaigns than the other groups.

The Kent Trust for Nature Conservation has launched several initiatives which strengthen links within Kent's environmental movement. The Trust moved swiftly to form a small storm damage team in 1987. Initially focusing on Trust reserves, the County-wide scale of the problem, and the emergency clear-up approach of many authorities and landowners (Sinden, 1988), alerted The Trust to the potential damage done without sensible management policies, especially the encouragement of natural regeneration. The Trust provided a crucial advisory role in co-ordinating the policy response and, through closer working links with Kent County Council and the Replant the Garden of England Trust, the independent Trees for Kent Project was born.

The status of the Trust was enhanced significantly through its initiation and organization of the *Wild in Kent Week* in the early autumn of 1988. The event attracted several sponsors and resulted in twenty six environmental organizations staging a total of forty four events. Success was measured by strong media coverage and by two thousand people joining the festival. The Trust were "pleased by the strengthening of links within Kent's environmental movement and the possibilities this opens up for the future" (Kent Trust for Nature Conservation, 1988, p. 9). The event was the platform for establishing an embryonic environmental organizations network with a broader and more localized base than previous regional and national level partnerships.

The Trust has succeeded in maintaining a broad appeal both in terms of activities catering for a broad membership (Bull, 1990) and in terms of a public image which promotes nature conservation as a community benefit. Members are attracted by a

desire to be informed about conservation at the local level, by the opportunities of visiting and enjoying The Trust's reserves and/or by the opportunities for active participation in organized conservation. Local government is attracted by the ecological expertise that The Trust can introduce into its policy-making and by the practical help available through volunteers, or relatively cheap temporary labour, for survey work and habitat management. Other environmental and amenity groups can benefit from The Trust as an ally, whether they regard nature conservation as just part of their wider environmental objectives or whether the nature conservation case supports their protectionist, anti-development stance. On the other hand, The Trust can stand relatively aloof from their policy objectives through its narrower focus, although the impact of major developments such as new roads and the Channel Tunnel rail link has drawn The Trust into wider policy issues.

The transport issue has come to the forefront of environmental campaigning in Kent with landscape and habitat loss observed and predicted as a result of new transport corridors and road improvements. The Trust joined four other Wildlife Trusts in the South East to jointly fund a Roads Campaign officer, previously with Friends of the Earth, whose brief was to co-ordinate the environmental movement's lobbying. The Trust risked their reputation by supporting the wider environmental argument for curbing the growth of road transport, especially if this were to include life style challenges to their members and an excursion into stronger pressure group tactics (South East Wildlife Trust Campaign, 1990). Other environmental groups with a stronger campaign emphasis on transport issues such as Friends of the Earth and Transport 2000 would lose faith with any pivotal, co-ordinating role of the Trusts if they were to hide behind their neutrality, narrow policy stance and insider status.

The Trust's staff are relatively low paid, but highly professional, generalists who draw on the specialist and technical knowledge of other environmental organizations in support of their integrating role. From an apparently narrow interest base, The Trust has come to occupy a relatively broad niche in the activities of the environmental movement in Kent. The Trust has achieved insider status through its narrowly defined credentials. From this base it has extended its influence into wider

environmental debate. This has enabled The Trust to assume a pivotal position within the environment movement in Kent; a fact attested by its publication of *An Environmental Directory for Kent, 1990* which lists local, county and some national organizations drawn from the spectrum of amenity groups, single local issue campaigning groups, Kent branches of crusade groups, natural history and leisure groups, alongside nature conservation organizations.

### **Friends of the Earth and their relationship with local government in Kent.**

Friends of the Earth have a patchy distribution of local groups. In Mid and West Kent there are groups in Tunbridge Wells and Maidstone but not in Tonbridge and Malling or Sevenoaks. The original Tunbridge Wells group was defunct by the late 1970s but was reborn in June 1989 when a group of friends and acquaintances advertised a public meeting to re-form the group. Soon after, the national office launched *The Environmental Charter for Local Government*. An active campaign was begun locally by a recently-retired paper manufacturer acting as Council Liaison Leader. The efforts to introduce *The Charter* were thwarted by the Council's reticence, in contrast to the neighbouring Borough (see Chapter Four) which the local group regarded as "much more advanced in their attitude towards the environment" [Revell/9/91]. Analysis of the environmental programmes of the two boroughs revealed some differences of approach but did not support such a simple contrast in terms of performance. Thus, Tunbridge Wells opened one of the first bottle banks in Kent in 1983 and one of the first can banks in 1989, and has increased the number above Tonbridge and Malling, claiming it collected more recyclable material than any other council in Kent. Both Councils forestalled the Environmental Protection Act in terms of anti-litter and street-cleaning provision and met standards required without significant extra spending, although both seek improvements. Tunbridge Wells, Tonbridge and Sevenoaks combined resources to open a unit for chlorofluorocarbon recovery from old refrigerators and other appliances.

The local group may have contributed to their own failure to achieve their ends by the tactics they employed, which were those of an inexperienced ideological outsider group. A small deputation met the Leader of the Council and other Members to expound the virtues of *The Charter* on the day after the official national launch. The councillors took the opportunity to explain existing Council policy and its adequacy within available budgets. A junior member of the deputation responded with rather agitated comments on the Council's failings, with a hasty demand to sign *The Charter*; this proved disastrously counter-productive. Despite an apologetic letter from the Council Liaison Leader, the response from the Council was delayed several months and consisted of a long compilation from the Leader and various officers defending their decision not to sign *The Charter*. Two basic reasons given were:

- (1) it would not be possible to do everything recommended;
- (2) they were already caring for the environment and doing as much as the public were prepared to support within community charge limits.

From the local group's perspective the Council had not availed themselves of the practical recommendations, nor clearly understood the intentions of *The Charter*, and misrepresented the claims of environmentalists. Retrospectively, they blame the Council for adopting an insular approach to environmental problems, but would handle their presentation differently. Outsider groups need to recognize the novelty of some of the ideas they are presenting and the need to maintain contact with the Council during the time of assimilation to avoid misunderstandings (Friends of the Earth, 1991b).

The Council Liaison Leader subsequently held meetings with the Leader of the Council, the Chief Executive and the Projects Officer, himself a Friends of the Earth supporter, which achieved more positive exchange on specific issues. However, he remained sceptical of the level of progress achieved, citing party politics and the demographic composition of the Borough as reasons for the failure. Opposition Members to the controlling Conservative Group have been more supportive of the group's overtures but "anything they introduce to Council is voted down on principle; whilst the high proportion of elderly, retired people on the one hand and absentee city commuters on the other favour conservative policy-making" [Revel/9/91]. These

observations were supported by quoting the higher average age and length of service of Councillors, who met in the afternoons rather than the evenings, in marked contrast to the neighbouring Borough.

As a relatively young group, networks of contacts with both the Council and other environmentally-concerned groups are still being built. The group has been approached by the local Chamber of Commerce and by Social and Liberal Democrat councillors seeking guidance on environmental initiatives. Increasingly effective contacts have been made with both officers and councillors, mostly by moderate members meeting individuals. One success claimed was a clause inserted by the Architects Department into all contract work insisting that only tropical hardwood from sustainable sources be used. The group also pressed for better maintenance of Tunbridge Wells and Rusthall Commons which now looks likely with the formation of the Friends of Tunbridge Wells Commons, whom the Council Liaison Leader serves as secretary. Good relationships have been established with the Conservators, who were the previously unwilling Lords of the Manor, who now have the Council's Chief Executive as their secretary. Pressure has led to the sort of convergence out of which policy communities are born.

Greatest progress has been achieved on recycling for which the national group has a strong reputation (Friends of the Earth, 1990b). The group are disappointed by the slow rate of progress on issues such as the introduction of a rag bank at each recycling station, and delay in appointing the full-time recycling officer which was agreed by council in 1990 but rescinded in favour of trials on 'wheely' bins which the group believes diverts more unsorted waste out of the waste stream into land fill. However, local officers and councillors have taken up invitations to public meetings called by the local group that have openly discussed policy options without confrontation, and have requested Friends of the Earth literature (1991a). Practical projects gave a valuable lead to the public and, perhaps, the Council. For example, the local group have operated a cardboard recovery service in the town since 1989. A local merchant collects the materials, with corrugated cases still proving relatively valuable despite a depressed market. The local group participated in the Friends of

the Earth national survey of public opinion on recycling attitudes and recorded ninety-one percent of 340 respondents in favour of returnable/re-fillable bottles compared to national average of eighty-four. A clear lead was given by the group when they published and circulated their Green Guide (1990c) whose recycling section had a promotional role very similar to the Tonbridge and Malling Recycling Directory (1991).

The local group continues to raise more radical issues such as opposition to town centre shopping developments with their provision of high density car parking, on grounds of traffic congestion and the benefits of public transport and more localized shopping centres: issues taken up in consultation over recent draft Local Plans. The group claim that the Council's rejection of their request for an external environmental audit is over-sensitivity to criticism: a common problem to outsider groups. Media exposure via press releases and interviews with local papers has mostly resulted in copy only where controversy was implied: a problem for a group seeking to directly influence policy makers but liable to give offence.



## Comparisons with other environmental organizations

An attempt is made to generalize the findings of this chapter by categorizing eight other members of the potential environmental policy community using criteria which distinguish the four organizations studied in detail (Table 5.2).

**Table 5.2** A notional classification of the role and character of environmental organizations

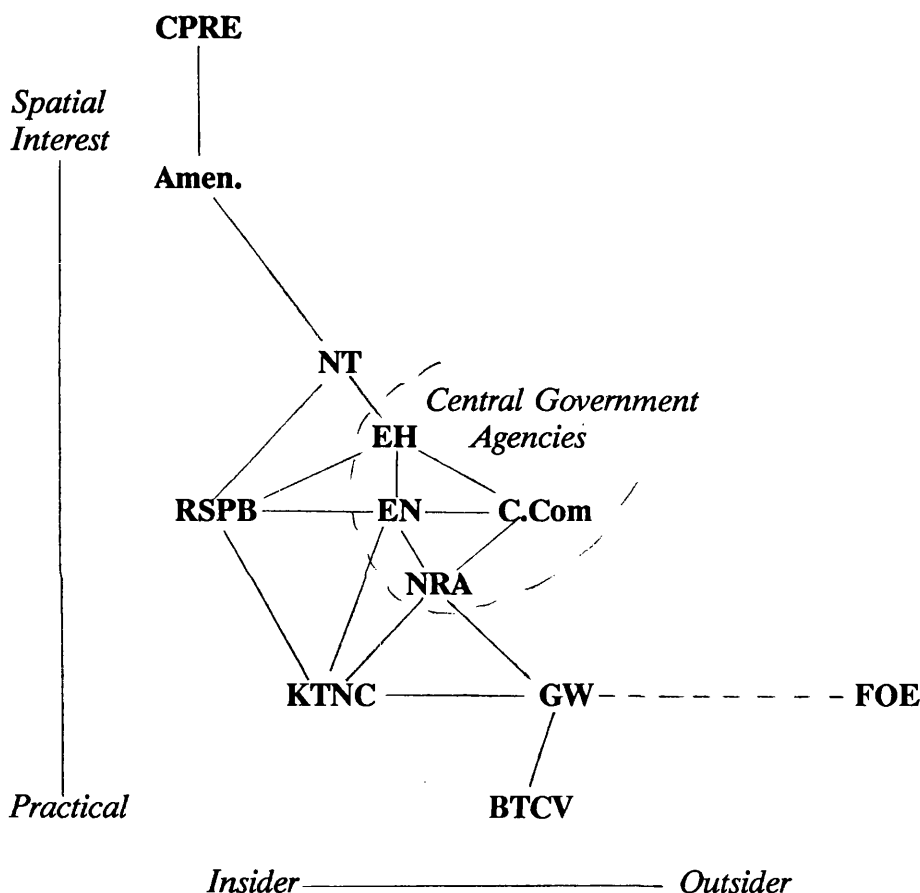
	CPRE	KTNC	C.Com	FOE	Amen.	EH	NT	EN	GW	NRA	RSPB	BTCV
Insider/outsider status	7	6	8	2+	6	8	7	8	6	8	5	4+
Officer/councillor contacts	5	8	9	4	2	6	4	9	5	9	8	6
Policy administration/implementation	5	7	9	6	2	6	3	7	3	5	8	1
Staff/member-led	7	7	9	3	4	9	9	9	3	9	7	2
Promotional/protectionist	4	6	7	8	2	4	3	6	8	4	5	5
Old/recent group	8	4	6	2	5	7	9	6	1	1	9	3
Size of membership/area	6	7	0	3	9	5	9	0	1	0	8	2
Strength of links in groups' network	7	7	1	3	5	1	3	2	3	4	4	3
Area covered by activity	7	5	4	6	8	0	1	1	1	4	2	3
Dominance of single-issue	6	8	6	3	9	8	7	8	6	7	9	7
Range of issues covered	5	3	6	6	2	1	2	1	4	5	1	3
Number of contacts with other groups	8	5	3	2	3	1	2	2	4	5	5	3
Practical work function	2	8	2	4	2	4	7	2	9	5	3	9
Leisure area facilities	6	3	7	1	4	6	8	0	4	3	2	4
Social function	4	3	0	5	4	0	2	0	4	0	7	6
Educational function	5	7	2	2	1	2	3	1	1	2	7	3
	CPRE	KTNC	C.Com	FOE	Amen.	EH	NT	EN	GW	NRA	RSPB	BTCV

Scale: spectrum from first criterion (9) to second criterion (0);  
or scale/importance of feature listed from 9 (High) to 0 (none).

Key: BTCV: British Trust for Conservation Volunteers; CPRE: Council for the Protection of Rural England; KTNC: Kent Trust for Nature Conservation; C.Com: Countryside Commission; FOE: Friends of the Earth; Amen.: Amenity Groups and Societies/Civic Trust; EH: English Heritage; EN: English Nature; GW: Groundwork Trust; NRA: National Rivers Authority; NT: National Trust; RSPB: Royal Society for the Protection of Birds; +: increasing.

In an attempt to generalize this classification, correlation coefficients (Appendix 2) were calculated between every pair of organizations and the structure of their interrelationships and used to construct a constellation diagram (Fig. 6.3).

**Fig. 5.1** The role and character of environmental organizations contrasted




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**Key:** see Table 5.2; —  $r > .3$

The analysis confirms the diverse characteristics of environmental organizations and similarities in the characteristics of government agencies. Two general axes are interpolated to explain the spread of groups. One suggests a dichotomy between groups with a practical emphasis compared to more spatially orientated amenity groups, the second distinguishes the outsider status of Friends of the Earth and confirms its contrast with other groups.

## Summary of the characteristics of the selected environmental organizations

The Countryside Commission represents the role of a statutory government agency, compared to three voluntary groups: the Council for the Protection of Rural England representing a long established pressure group, the Kent Trust for Nature Conservation representing a group with a specialized sectoral interest, and the Friends of the Earth representing a campaigning group with a broad concern for the environment. These distinctions explain some of the status, role and behaviour of each organization (Table 5.3).

The Countryside Commission has articulated countryside policies which embrace both rural development and sustainable environmental management. These national policy guidelines have small effect on local authority policy, partly because of the limited time available to regional staff for promoting them, especially at District level. Wider influence is hampered by an over-emphasis on The Commission's custody of countryside designations such as Areas of Outstanding Natural Beauty and Heritage Coasts. Their most potent influence on policy is through decisions on the grant-aiding of environmental projects, especially those involving partnerships with local authorities.

With a focus on County planning, the Council for the Protection of Rural England relies on influencing Structure Plan policies, and the compliance of Local Plans, and on influencing major development proposals in rural areas. The Kent Branch has a strong alliance with amenity groups with whom the District Representatives have close contacts, especially since local amenity groups often co-ordinate local, issue-orientated protest campaigns. National campaigns have stimulated and informed County Branch campaigning, although pressurizing the small staff and active volunteers who are torn between the higher public profile of The Council and attending to development issues of particular local impact.

Table 5.3 Summary of the status, role and behaviour of four environmental organizations studied in detail in Kent

CHARACTERISTIC	COUNTRYSIDE COMMISSION	COUNCIL FOR THE PROTECTION OF RURAL ENGLAND	KENT TRUST FOR MATURE CONSERVATION	FRIENDS OF THE EARTH
STATUS	Statutory consultee	Respected pressure group	Expert group	Pressure group
REPRESENTATIVE	Not at all	Moderately: <i>vestigial class bias</i>	Small but has grown with <i>increase of members</i>	No, but significant minority
MEMBERSHIP	None	2,500	8,900	Not known, c. 1,000 in local groups
STANCE	Policy promotion	Protectionist (narrow)	Promotional <i>Conciliatory</i>	Radical <i>broadly protectionist</i>
TACTICS	National promotion Local grant provision (Public meetings)	Press release, media Formal letters: officials <i>Public meetings</i>	Press release Formal letters: officials	Public spectacle event Letters: council/dept.
CONSULTATION ARENA	Structure & Local Plans Major rural developments	Structure (& Local) Plans Monitor rural development	Site based (SNCI) Development & wildlife	Issue-orientated objections; Strategies
MAIN TARGET BODIES	Kent CC; Landowners C/S Management Schemes	Kent CC (District Councils)	Kent CC; (Local business) District Councils Local business	District Councils Local business
TARGET DEPARTMENTS	Planning Economic Development Highways	Planning Highways	Planning (Economic Development) (Highways)	Chief Executive; Environmental Health (Planning/Highways)
EXPERTISE	Countryside designations Recreation and access Rural development	Countryside protection (Rural development)	Wildlife; education Habitat management	Pollution; recycling; energy; global issues
KNOWLEDGE/INFORMATION	National publications	(National publications) <i>Planning skills</i>	Habitat inventory Local surveys, <i>practical skills</i> <i>wildlife consultancy</i>	National research base
VANGUARD ACTIVITIES	Landscape assessment Community Forests Countryside Stewardship	(Water abstraction) (Golf courses)	Habitat & SNCI Surveys (Environmental Impact)	<u>Environmental Charter for Local Government</u>
LEADERSHIP/CO-ORDINATION	Policy suggestions, otherwise responsive	Joint campaigns Amenity groups coordinate	Communication node Potential lead role	Independent, occasional lead on local campaign

The Kent Trust for Nature Conservation is a multi-faceted organization with a well developed resource base. As a landowner, The Trust has developed an affinity with the landowning community with their well established political influences; as educationalists, The Trust has built a reputation which gives it a position in the development of policy on environmental education; and as expert naturalists combining experience of habitat management, The Trust has acquired a consultancy role in environmental impact assessments for local government and the private developer in Kent.

The Trust has a strong promotional role and yet a relatively restricted protective role focusing on its own reserves. This has enabled The Trust to build an image of a group with valuable expertise and a viewpoint worthy of consideration without strong overtones of self-interest protectionism. The expert knowledge resulting from The Trust's own survey of Sites of Nature Conservation Interest and involvement in the comprehensive District-wide Habitat Survey have given The Trust an entry into the early stages of local and structure plan preparation. The maps and vital statistics from the Habitat Survey are used to "bombard local plan and development control processes" [Buckley/2/92]. As a result The Trust's own priorities become enshrined in local plans, often to a very significant degree. The Trust has entered into conciliatory partnerships in relation to development proposals but has to decide what compromise to accept between specific habitat protection or management gains and the more general impact of development on wildlife.

Friends of the Earth successfully introduced its *Environmental Charter for Local Government* (Friends of the Earth, 1989a) into a number of Council policy statements. In the case study followed, the local group was unsuccessful in persuading the Council to adopt *The Charter*, whereas the neighbouring Borough, without a local group, responded positively to the document sent from the national office. The evolution of the local group and differences between the Councils created this paradox. Friends of the Earth have developed a two way support network between national and local campaigns which can operate in tandem or independently. While outcomes depend on the nature of contacts made, the two tiers of operation are an effective campaigning tactic (Weston, 1989).

## **CHAPTER SIX**

### **CONCLUSIONS: EVALUATION OF THE EMERGING ENVIRONMENTAL POLICY COMMUNITY AND ITS CONTRIBUTION TO ENVIRONMENTAL POLICY-MAKING**

#### **Local government's response to the environmental challenge**

Difficulties in solving environmental problems have challenged the existing policy and behaviour of commercial interests, government institutions and private individuals. Local government is uniquely placed to interpret and represent local public concern over environmental issues and can regulate, or at least influence, corporate, local authority and individual activities which impact on the environment.

Local government is also, potentially, well placed to co-ordinate the local response to the environmental challenge through its public policy-making function. However, several constraints to the effective development of environmental policy at local level have been identified:

- a) restricted powers granted by central government for pro-active environmental management at local level;
- b) traditional departmental structures which compartmentalize environmental problems along established professional lines;
- c) resource limitations;
- d) the inertia of existing policies and policy priorities;
- e) powerful, especially economic, interests which block or retard the implementation of policies which would reduce detrimental environmental impacts.

Notwithstanding these constraints, some local government initiatives tackle the environment more holistically and give it greater priority in policy-making. A number of innovative approaches to environmental policy by local councils have been identified:

a) example setting:

- internal Environmental Audits with policy responses;

b) base-line area-based environmental surveys:

- State of the Environment reports;

c) general environmental policy statements and action plans:

- Environmental Charters and Strategies;

d) demonstration and catalytic environmental projects:

- environmental management initiatives.

Initiatives are recent and diverse but major differences between local authorities are the adoption of either cautious and exploratory approaches which tend to opt for Environmental Audits or State of the Environment Reports, or promotional approaches which choose Environmental Charters or high profile environmental projects at the outset. Further policy development often combines these approaches.

### **Local government and environmental policy-making**

The policy-making process in local government is complex. Ultimate authority is vested in the democratic accountability of a majority vote of Members of the local council. Many policy-decisions are formally taken within the committee structure of the local authority and ratified by the full council. However, there is a pre-selection process which has already chosen between alternative policies before the submission of resolutions to committees. Furthermore, power to interpret and implement policy is often delegated to departments and their staff.

## Hypothesis evaluation: 1) the components of local government pluralism

The first hypothesis is subdivided into two modular perspectives and postulates motivations for pluralism in environmental policy-making:

### HYPOTHESIS 1A

**Local government will widen its contacts with environmental groups in order to overcome shortfalls in its environmental information base and in its expertise and resources for environmental management, and to boost its role in environmental policy-making.**

Local government has increased its consultation with environmental organizations in the formulation and review of policies that are acknowledged to impact on the environment. This includes participation in pre-consultation meetings concerning specific sections of Development Plans and in Forums set up to explore contentious issues and to make policy proposals. Both statutory consultees and organizations which have participated in public consultation exercises are involved. Although some have a strong tradition of interaction with local government others are more recent members of a policy community but enjoy benefits equivalent to those long available to Kent-based firms and local amenity groups.

Kent County Council is relatively well equipped to assemble existing environmental information but lacks the localized manpower for implementing policies and for new surveys. Contacts with environmental organizations are important for the mobilization of volunteers and the co-ordination of projects supported by joint grant aid, such as Countryside Management projects and the County Habitat Survey which foster partnerships between environmental organizations and the two tiers of local government. The County has no clear mandate for integrated environmental management but has a resource base which is sufficient to fund pump-priming or flagship initiatives. It achieves legitimacy for these through partnerships, and uses its own funds to lever further resources from funding bodies or commercial enterprises.



District Councils differ in their approaches to environmental policy. Only some in Kent have sought an overtly integrating strategy. Few formal contacts with environmental organizations appear to have been initiated by officers although there are many representations from environmental groups through comments on planning applications, and through local plan consultation and public inquiries. In several instances, environmental health officials have participated in public meetings organized by groups such as Friends of the Earth. Many environmental health departments were actively involved in gathering environmental information dossiers and drew on literature from environmental groups as well as professional and trade literature.

Local government staff cuts and compulsory competitive tendering have combined to restrict the feasibility of providing such non-mandatory services as open space enhancement, countryside management and wardening, environmental education, and non-technical environmental monitoring. As a result, local government in its enabling role has nurtured environmental organizations to assist in achieving its policy goals. Drawing environmental groups into policy derivation not only gains the benefits of their knowledge, expertise or opinion, but also circumvents time- and resource-consuming conflict at the policy justification stage. A network centred on local government has the potential for co-ordinated action. Environmental problems which extend beyond the immediate duties, powers and professional capabilities of local government officials can be approached through partnerships with interested bodies who can contribute to the policy debate and to the implementation of solutions. Consensus policy-making and pluralistic partnerships may be used to increase support for local government and to achieve service delivery goals despite public expenditure and legislative controls.

Environmental organizations lack the political power of local government and the responsibilities it carries; yet they have an interest in, and a contribution to make to, policy-making by local government:

**HYPOTHESIS 1B**

**With high levels of public awareness of environmental issues,  
a wide range of interests will seek to influence  
the environmental policy-making of local government  
but the success of their representations will be determined  
either by their acknowledged expertise in the environmental arena  
or by their credentials as representatives of public opinion.**

Environmental groups differ in the breadth of issues which they tackle and the extent to which they seek to influence public and/or private policy. The remit of an environmental group will be determined by the historical reason for its formation, its membership and resource base, and the evolving nature of the issues or target organizations which it tackles. Insider groups can often exert more precise pressure than the diffuse pressure of public opinion, particularly where they can apply pressure at formative points in the policy-making process.

The new wave of interest in local government policy-making (Tyldesley and Collis, 1990), expressed specifically by Friends of the Earth, may have resulted from the relative impotence of environmental pressure groups at central government level in the face of the adversarial politics of Thatcherism (Thornley, 1991) which dismembered pluralistic contributions to policy-making. On the other hand, it may have been a confident expansion of spheres of influence following membership increases during the 1980s. In Kent, groups such as the Kent Trust for Nature Conservation and the Council for the Protection of Rural England extended their contacts from County to District policy-makers, and, in the former case, to more departments at County level too. The Countryside Commission has also targeted District Council policy-making in recent publications and policy statements.

Environmental organizations have gained greater opportunities for influencing public policy through:

- a) providing information and policy recommendations for the setting of the policy agenda;
- b) membership of forums for the discussion of environmental issues;
- c) increased consultation prior to policy adoption; and,
- d) partnerships in the implementation of environmental initiatives.

It is more difficult to assess the potency of these organizations as representatives of public opinion. Many target the bureaucracy of local government, at least openly, rather than the political system. Two reasons are their sectoral affinity with departments, and the relative permanency of the bureaucracy. On the other hand, amenity groups and Friends of the Earth local groups, are organized along spatial rather than sectoral lines. This better accords with the political focus of elected representatives, and contacts with councillors are stronger. However, contacts with officials at the policy derivation stage, and through the detailed phases of policy refining, are still recognized as vital for influencing policy. Issue-orientated groups most often arise reactively to the application of established policy to a specific locality, or to the threat of development contained in a deposited planning application. The received wisdom of all the established environmental organizations interviewed in this study was that the chances of successful opposition are lower the later in the decision-making process that representations are made. By contrast, involvement in information exchange at early stages in policy-making provides an early warning of threats which can be opposed in the agenda setting or policy derivation domains. Failure leads to confrontational bargaining before policy adoption, such as by objecting to planning applications or participating in a Public Local Inquiry. Acknowledged expertise is more important for achieving access to early stages of policy-making than representative status. Nevertheless, the mandate of an interest group is an element of its legitimacy that should not be dismissed, particularly in the domain of policy justification. Credentials of representativeness are likely to be raised at the crucial committee debate prior to policy adoption when a group's name is cited in support of a policy proposal.

## Limits to pluralism in local government policy-making

The study has identified a network of actors and interests in environmental decision-making. The network has the capacity to exchange information and opinion to apprise policy options, and to pool the resources needed to implement policy decisions.

Several shortcomings in the openness and flexibility of local government limit the pluralistic ideal of the full exchange of information and opinion by all interested parties prior to the adoption of policy (Lukes, 1974). Firstly, local government is organized around circumscribed, politically-scrutinized, policy areas (Stoker and Wilson, 1991) in which power is institutionalized through routine procedures that originated in previous decisions and the values underpinning them (Giddens, 1986). Thus, power is vested in committees and the consultation procedures relating to their policy remit: the procedures of working parties, a common means of establishing proposals for environmental strategies, tend to exclude public scrutiny of their policy deriving function. Secondly, decisions and actions by other public or private organizations or by individuals provide the structural context for local government and restrict the options available to public policy (M. Smith, 1990): local government has certain powers of environmental regulation but limited influence on investment decisions or practices of environmental management such as farming. Thirdly, 'non-decisions' can be as, or even more, important than formally adopted policy decisions (Bachrach and Baratz, 1970; Blowers, 1984; Hill, Aaronovitch and Baldock, 1989; Lukes, 1974). These non-decisions arise from bias in the policy agenda (Saunders, 1975) through the exclusion of some issues or policy alternatives, perhaps because of their contentious nature.

Despite these obstacles, local government has adapted its role towards greater openness and flexibility. The formation of committees with particular responsibility for the environment and their links to environmental forums is an important development in several local authorities. Partnerships have increased the mutual

influence of the public and private sector in environmental project planning and implementation. Nonetheless, some issues regarded as important to the environmental movement, such as sustainable development and radical resource conservation strategies, rarely reach the agenda of local government. An environmental policy community could challenge these non-decisions, and the democratic accountability of local government is an important test for the credibility of policy. Pressure group campaigning (Wilson, 1984) can influence local government decision-making by direct persuasion through established channels and by leading public opinion to expect public policy to include acceptable environmental planning.

### **The structures of local government decision-making**

Recent calls to more holistic environmental policy-making challenge the assumptions behind the sectorally-organized administration of local government. Responsibility for areas of environmental policy has been divided between different tiers of government and has been subsumed piecemeal under the service provision heads of a number of local government committees and departments.

### **Hypothesis evaluation: 2) the internal restructuring of local government**

The second hypothesis developed in this thesis postulates that the seeking of solutions to environmental problems exposes shortcomings in the policy-generating procedures of local government. New structures are required to tackle interrelated environmental problems in an integrated manner:

#### **HYPOTHESIS 2**

**An effective response by local councils to the environmental challenge requires new committee and/or departmental aims and structures to deal with the environment in a more integrated way than is possible under the traditional structure of local government.**

No single pattern emerged from the study of local authority decision-making structures as applied to environmental policy-making. Significant changes were made in some cases where a lead was taken in generating integrated environmental policy. The approaches adopted included widening the brief of existing policy-making processes; the improvement of communication between existing policy heads; and the creation of new decision-making structures.

Recent trends in the corporate management of local government through a powerful chief executive department (Sabin, 1989, 1990) provide greater scope for co-ordinated, cross-department policy-making and budgeting. These trends pre-date efforts to achieve integrated environmental policy but open the way for new structures of policy-making on the environment where there is the political and administrative will. It is suggested that the issue of the environment has been used as a convenient and auspicious vindication of corporate management initiatives. However, there are also signs, maybe resulting from economic recession, that new committee and departmental responsibilities which place greater emphasis on integrated and innovative environmental policy initiatives are now threatened. The threats include the re-focusing of budgets along traditional service-delivery lines and the re-establishment of departmental and committee custody for sections of the environmental policy brief.

Environmental policy-making also challenges the division of responsibilities between two tiers of local government. Co-ordination between sectors embodied in different tiers has been weak. For example, the linkages between County strategic planning and District environmental health have been poorly explored.

### **Hypothesis evaluation: 3) The formation of an environmental policy community**

A policy community is formed when non-government interests have power to influence decisions as a result of their privileged status in relation to public policy-making procedures. The final hypothesis presented in this thesis describes a scenario based on a harmony of public, political, bureaucratic and interest group concern to respond positively and practically to the environmental challenge:

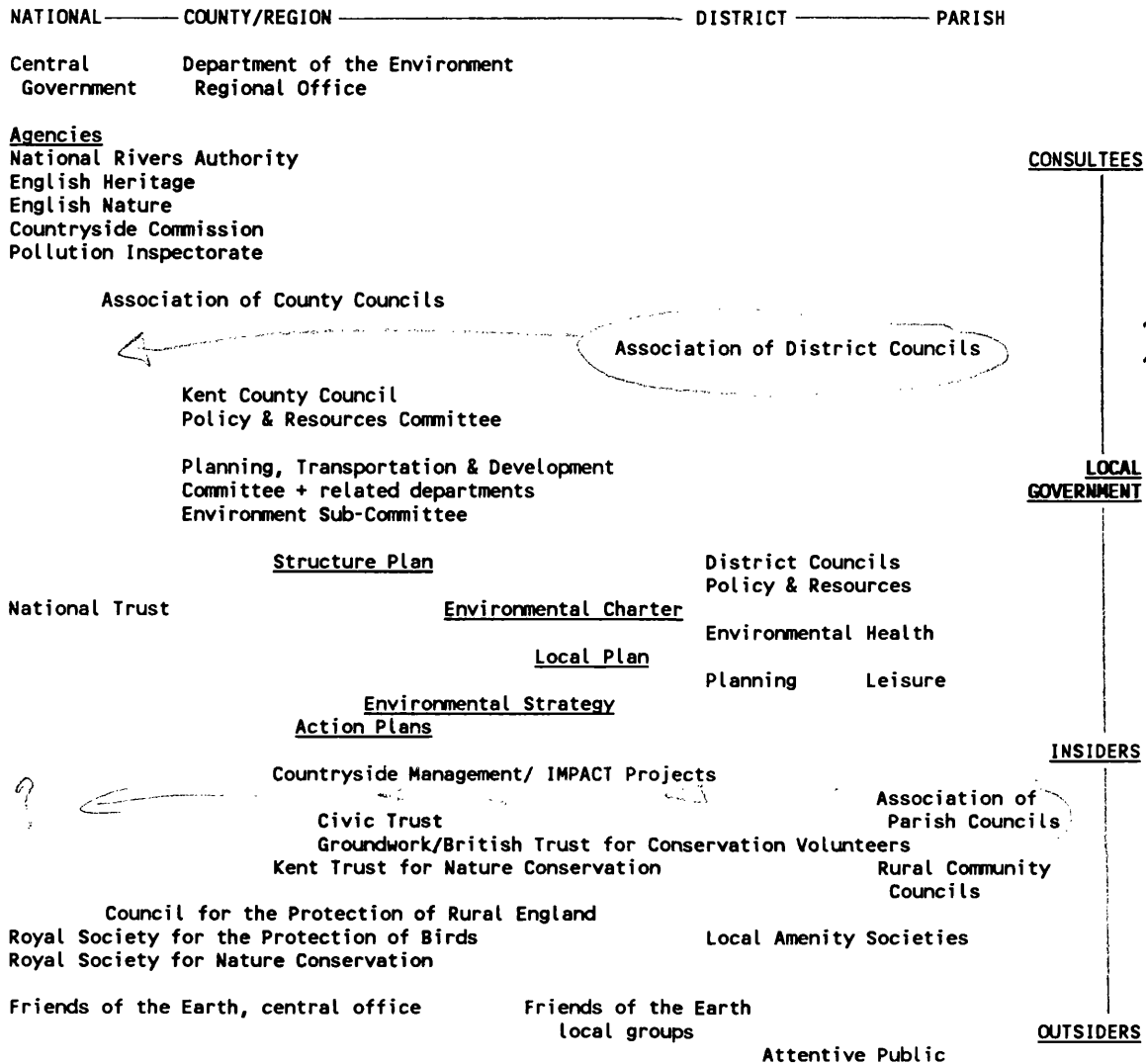
#### **HYPOTHESIS 3**

**Growing public concern for the environment has led to dissatisfaction with existing environmental policy and created the conditions in which local government and a network of environmental organizations are discovering mutual benefits in the formation of a new policy community.**

The period of the late 1980s was a time when such a convergence of interests occurred.

Figure 6.1 highlights the diversity of the emerging environmental policy community, particularly the interdependence of government and voluntary bodies and their operation at various overlapping spatial levels. The ability of such disparate entities, and the issue network that they represent, to combine forces in an environmental policy community depends on their developing a common interest in broad environmental issues and their willingness to subsume their unique concerns within a wider response to the environmental challenge. Evidence from the literature and policy documents produced by these bodies pointed in this direction, as did the increasing co-operative interaction in environmental forums and policy discussion meetings. Successful integration of existing policy communities and genuine cross-sectoral co-operation towards an environmental policy agenda may obviate the need for the further development of broad environmental groups, or 'green' political parties.

**Fig. 6.1 Some components of the emerging environmental policy community**



Key: Key policy processes;  
left to right: smaller spatial units; top to bottom: network links to local government.



The spatial and sectoral dimension of environmental organizations and policy communities

In analysing the contribution of the four selected environmental organizations, the scale and extent of their spatial and sectoral interests (Table 6.1) emerges as a significant determinant of their ability to penetrate particular policy communities surrounding local government in Kent.

Table 6.1 Spatial and sectoral interests of four environmental organizations

	<b>SPATIAL INTERESTS</b>	<b>SECTORAL INTERESTS</b>
<b>Countryside Commission</b>	National and regional	Countryside designations Sustainable rural development
<b>Council for the Protection of Rural England</b>	National and County/local	Protectionist, anti-development Rural interests
<b>Kent Trust for Nature Conservation</b>	County and site specific	Nature conservation Habitat management
<b>Friends of the Earth</b>	International and issue-orientated	Environmental safeguards Quality of life

Local policy communities will inevitably have a strong spatial component because of the jurisdictional boundaries of local government. Sectoral interests can be addressed through their manifestation within spatial units but their core concerns are often more appropriately pursued at central government or regional agency level. The wider scale spatial concerns of the Countryside Commission and the Friends of the Earth present some problems in identifying with local issues. Neither are likely to be routinely involved in the details of local policy-making. The Countryside Commission maintains an input through supporting projects proposed by the policy community and interposes its policy directions with those of the local policy community through grant administration. Friends of the Earth essentially operate around national campaigns. Its strong, centrally-supported network of local groups applies these campaigns locally. Other local issues can provide the focus for independent campaigning for these autonomous groups.

The Council for the Protection of Rural England has a strong spatial emphasis based on intervention in land use planning. Despite the County basis of the organization the local membership network is comparatively weak. However, District Representatives operate within local government boundaries, or their sub-districts, and are a direct contact with local government. Recent moves to establish district committees (Oliver, 1992), if implemented, could strengthen The Council's role in the spatial policy communities centred on District councils. This strategy operates in tension with nationally instigated, sectoral campaigns. Some evidence surfaced in the study suggesting that the spatial emphasis was reinforced through individual members in contact with councillors and senior local government officials, themselves well represented in the membership list and on the executive council. The District Representatives, the official, local campaigning arm of The Council, did not admit to contact with many other members and possibly operated independently of the more politically-involved members. The latter might attempt to introduce issues onto the political agenda, whilst the District Representatives deal with specific proposals which have already passed through the policy community once they have been made public.

The Kent Trust for Nature Conservation has the advantage demonstrated in its name of being specifically located in Kent. This advantage is achievable because of the relatively weak links with the sectoral parent body which devolves considerable policy latitude to individual groups in the 'Partnership of Wildlife Trusts'. The spotlight on Kent not only provides a ready association with the County Council as a spatial unit but also provides a sufficiently immediate spatial dimension for its promotional appeal at District Council level. It acquires further local standing through its site-specific interests, especially given the local amenity value of many of these sites. Local group and Green Team activities also highlight local and community involvement. The majority of members make little contribution into policy debate, as against practical conservation. This situation is happily accepted by staff members who might be embarrassed by intervention by less professional activists in the politics surrounding the policy community to which the staff have gained access.

## The contribution of policy communities to environmental policy-making

Most environmental organizations have a ready affinity with a sectorally organized policy community. Several policy communities with a specifically environmental brief operating at local government level in Kent were identified (Table 6.2). Several of these policy communities are interdependent although each possesses a sufficiently distinctive core to justify its separation. In policy terms, the Agricultural Production policy community is virtually independent from local government and initiatives in the Urban Improvement and Renewal field are often taken by central government, although partnerships with local government are important.

The emergence of the environmental challenge as a policy issue via public opinion, political parties and broad-ranging environmental groups presents a dilemma to these fragmented policy communities. The sectoral divisions of local government have created a policy vacuum in integrated environmental policy. Existing policy communities are drawn into wider level forums. They may re-define their traditional policy areas within an environmental logic, or form a sub-section dealing with broader environmental issues. The re-structuring of policy communities is evidenced by cases of joint policy planning, such as between Planning and Environmental Health departments (Peterborough City Council, 1992); by the emergence of strategic environmental policy statements from public bodies; and by environmental campaign alliances such as UK2000 and umbrella groups such as the Medway Environment Group, or wider regional networks (National Council for Voluntary Organizations, 1988; Warburton, 1991).

**Table 6.2 Participants in policy communities in Kent**

POLICY COMMUNITY	POLICY BODIES	LEAD AGENCY	INTEREST GROUPS/ AGENCIES	ATTENTIVE PUBLIC
Countryside and Landscape	CC;DC	Planning	CPRE; Amenity C.Com;RA;TFK; MT;NT;(KTNC)	Tourists
Nature Conservation	EN;CC;DC	EN Planning	KTNC;RSPB;KOS FWAG;BTCV;(WWF)	Naturalists
Amenity and Leisure	DC; (CC)	Amenities (Planning)	Sports clubs; Amenity; RA	Residents
Access and Footpaths	CC	Highways	RA;FPS;CTC;C.Com OSS;CLC;IWA;CLA	KTNC;CPRE Transport 2000
Heritage and Built Environment	CC;(DC)	Planning Bld.contr.	EH;Amenity;NT Civic; BAA	Residents Land owners Developers
Urban Improvement	CC;DC Groundwork	DOE Planning	Amenity;Civic Community UW	Residents Land owners Developers
Rural Development	CC;DC	Econ.devel.	RDC;KRCC;FC;C.Com CLA;(CPRE)	Rural industry/ residents
Agricultural Production	Cen.Govn.	MAFF	NFU;CLA;ADAS; (C.Com)	Farmworkers Residents
Food Policy	DC	Env. Health	Consumer	General public Media
Pollution Control	HMIP;DC NRA	Env.Health	TBG;FOE;Civic Greenpeace;(KTNC)	Industry Residents
Energy	Cen.Govn. Utilities	Dept.Energy	FOE;Greenpeace (CPRE;KTNC)	Users Residents
Transport	CC; BR Companies	Dept.Transport Highways	Transport 2000 FOE;(KTNC;CPRE; KRCC);Consumer	Users Commerce Residents
Environment	DC CC Companies Groundwork	Env.Health Planning Council	FOE Partners Interest gps Manag.projs.	Politicians Public & media Commerce Community

**Key:** ADAS: Agricultural Development Advisory Service; Amenity: Local Amenity Societies; BAA: British Association of Architecture; Bld.Contr.: Building Control section; BR: British Rail; BTCV: British Trust for Conservation Volunteers; CC: County Council; C.Com: Countryside Commission; Cen. Govn.: Central Government; Civic: Civic Societies; CLA: Country Landowners Association; CLC: Common Land Cause; Community: Community groups; Consumer: Consumer watchdogs; CPRE: Council for the Protection of Rural England; CTC: Cyclists Tourist Club; DC: District Council; DOE: Department of the Environment; Econ.Devel.: Economic Development Department; EN: English Nature; Env.Health: Environmental Health department; FC: Forestry Commission; FOE: Friends of the Earth; FPS: Footpath Preservation Societies; FWAG: Farming and Wildlife Advisory Group; KOS: Kent Ornithological Society; KTNC: Kent Trust for Nature Conservation; KRCC: Kent Rural Community Council; Highways: Highways and Transportation department; HMIP: Her Majesty's Inspectorate of Pollution; IWA: Inland Waterways Association; MAFF: Ministry of Agriculture, Fisheries and Food; Manag.Projs.: Management Projects, eg. Countryside management, river management; MT: Men of the Trees; NFU: National Farmers Union; NRA: National Rivers Authority; NT: National Trust; OSS: Open Spaces Society; Planning: Planning Department; RDC: Rural Development Commission; RSPB: Royal Society for the Protection of Birds; TBG: The Tidy Britain Group; TFK: Tress for Kent; UW: Urban Wildlife Trusts etc.; WWF: World Wide Fund for Nature (local branch).

## The role of environmental organizations in policy communities in Kent

The countryside organizations are naturally associated with the Countryside and Landscape and, often, the Access and Footpaths and Rural Development policy communities. Nature conservation organizations have traditionally formed a rather distinct Nature Conservation policy community. All these policy communities share a degree of anti-development sentiment, although the Nature Conservation policy community has recently tended to adjust its policy stance to accommodate economic interests as a means of seeking pragmatic solutions to potentially damaging conflicts. At the same time, the growth of interest in urban nature conservation has popularized nature conservation and given it an urban and social dimension of some political consequence. Urban sites have often aroused much more controversy than pristine Sites of Special Scientific Interest, although when the two combine campaigning reaches a crescendo (Black, 1991a,b). This challenges nature conservationists to present their policies in populist, non-technical ways, and to consider much broader environmental issues than a narrow focus on wildlife, especially of the rarer kind, which motivates many naturalists (Rotherham, 1990). As a result contacts are made with the Urban Improvement, and Amenity and Leisure policy communities.

The Countryside Commission has articulated policies which are widely circulated in the Countryside and Landscape, Access and Footpaths, and Rural Development policy communities. The Commission avoids debating contentious local issues except where specific countryside designations are involved. The Commission's general goals are met more by its grant-aid policies than by promoting the broad principles tendered in its published policy guidance. Grants are administered by the planners and implementers of policy who in setting grant and monitoring conditions establish the communication channels, from donor to administrator to recipient, which are important contributors to emerging policy communities. However, The Commission itself conforms to the pattern of an insider organization seeking minimal conflict within an existing policy community by incremental policy change rather than by participation in an emerging environmental policy community.

The orientation of the Kent Branch of the Council for the Protection of Rural England is that of a protectionist pressure group. However, the more holistic approach to rural development issues stemming from national campaigns has influenced the local policy stance. This has not yet been translated into the organization of local campaigns with the appeal to attract new members from people suffering problems over rural services, rather than those of more independent means living in rural areas who are attracted to the traditional protectionist policies. These policies may, in themselves, restrict the development of improved rural services. As a result of the retention of this traditional role, The Council, at local level, remains embedded in the Countryside and Landscape policy community with only weak inputs into other policy communities such as the Rural Development and Amenity and Leisure policy communities.

The Kent Trust for Nature Conservation has achieved growing influence in the development of environmental policy. This influence extends beyond primary concern for the protection and management of nature reserves into the Countryside and Landscape policy community. Of the organizations studied, The Trust shows the most signs of active participation as an accepted insider group in issue-orientated policy communities dealing with Pollution Control, Energy and Transport. It retains its base in the Nature Conservation policy community, but its acknowledged role there and its county-wide remit are the credentials by which The Trust gains access to other policy communities. The recommendations of the North Kent Marshes Study (Applied Environmental Research, 1991) suggested a key role for The Trust in policy development for the area and, thus, a position within the spatial policy community focusing on the environmental planning of the area. There are clear misgivings, however, should this role become associated with compromise policies that are damaging to the uniqueness of the wildlife interest. This is the potential cost of conniving as insiders to broader policy communities, especially where these transcend the boundaries of protectionist environmental policy to embrace fundamental issues of the links between social and economic and environmental policies (Architects Journal, 1986; Association of London Authorities, 1989; Atkinson, 1990b; Council for the Protection of Rural England/Green Alliance, 1990; Elkington,

Burke and Hailes, 1988; Fyson, 1992; Judge, 1990; Steeley, 1991; Town and Country Planning, 1990a,b; Ward, 1989).

Friends of the Earth have a sectoral interest which is broadly environmental and which does not easily relate to existing policy communities, although specific campaign targets often do. Friends of the Earth from the 1960s through to the early 1980s provided a strident, protesting voice (Lowe and Goyder, 1983, ch. 7; Weston, 1989). Campaigns were aimed at central government and corporate business policies and were non-compromising, using outsider tactics to raise public awareness and dissension. They were on the radical wing of the environmental movement and did much to raise the sights of more spatial environmental groups to contextual issues with implications for the objectives which they sought. Thus, issues such as resource wastage, energy conservation and pollution were linked to human welfare, to deteriorating urban and rural environments, and to the policy-making powers of economic and political bodies.

Friends of the Earth's 'Local Councils' campaign grew out of the demands of local groups for national campaigns with a clearer local focus, and from the recognition of opportunities to influence policy at local level at a time when central government was especially resistant to pressure group involvement. With no pre-established position in local policy communities, Friends of the Earth were free to suggest innovative cross-sectoral policies. However, their growing expertise in pre-campaign research was also applied to explore the workings and policies of local government with a view to effective influence. Through the *Environmental Charter for Local Government*, Friends of the Earth combined their breadth of knowledge on environmental matters in a document that was to provide a lead for many councils seeking guidance on integrated environmental policy options.

Friends of the Earth, in contrast to the other three environmental organizations, have entered into the local government arena of environmental policy-making as recent entrants, as outsiders and as campaigners for significant change. These credentials would not seem to augur well for successful penetration of the mechanisms of

environmental policy-making. However, the timing of their entrance and the quality of their environmental research and its publication found a vacant policy niche which many in local government, in response to public, professional and political pressure, were anxious to see filled. Existing policy communities were poorly equipped to tackle the issues being raised, at least at the integrated level being proposed. As a result, policy communities were threatened with losing their monopoly of the policy agenda and of their ability to limit policy proposals to technical matters within their control. In some cases, existing policy communities were able to re-group and re-gain the initiative through addressing novel issues and providing locally-satisfactory solutions to the exclusion of policy proposals from Friends of the Earth, and, indeed, other environmental groups. In other cases, Member- or officer-led initiatives resulted in clear breaks from established policy.

Environmental Health had been one of the more technical branches of local government operating within a set of very specialized and self-contained policy communities. These policy communities were largely professionally-based and had attracted minimum interest from voluntary groups; an exception being the Tidy Britain Group. In an era of financial constraints on local government, the repercussion of this lack of publicity was a failure to rally popular support for the policy area when it was vulnerable to resource cuts. A professionally-led revival in the promotion of the holistic and pervasive benefits of environmental health services (as distinct from a purely regulatory role) corresponded with the growth of public and political concern for the environment. Uncluttered by any existing loyalty to a broad-based environmental policy community, some environmental health departments were able to advance comprehensive environmental policy proposals faster than most existing policy communities; notably, those centred on planning departments. Lack of attachment to interest and pressure groups also averted the antagonism that established policy communities might show to radical newcomers such as Friends of the Earth.

The conjunction of Friends of the Earth as a rather footloose environmental group seeking entry to local government policy-making, a traditional compartment of local



government seeking a new and broader-based legitimacy, and a political (and often corporate administrative) will to take on the environment as a cross-department issue provides the foundation for a new policy community concerned with the 'greening' of policy through the introduction of environmental principles.

### Access, influence and incorporation in policy communities

Both insiders and outsiders to policy communities possess a combination of advantages and disadvantages for the furthering of their interests. Table 6.3 uses distinctions made in the literature and rates their importance to the four organizations selected in this study. As a result of observing these organizations, their position on the continuum from prisoner insider to ideological outsider groups (Grant, 1989b) is reviewed.

Membership of a policy community confers a number of benefits but also brings obligations which may deter environmental organizations from too great an involvement. Membership bolsters the status of a group and secures privileged access to decision-centres, the agenda of policy-making and the flow of information through the community. In return for the opportunity to influence public policy and the other members of the policy community, insider organizations must be prepared to adopt the procedural and behavioural rules, based on co-operation and compromise, governing the policy community. Once groups have gained insider status, "instead of clamouring to be consulted, they are hounded for advice" (Pross, 1986, p.146). The Kent Trust for Nature Conservation found that a significant time commitment was required of staff for policy discussion, especially as not all issues debated were of primary concern to the group [Raine/3/92]. They could commit the time because of their relatively strong staff base. The staff adopted a relatively low profile insider status, perhaps conscious that their status was achieved through concerted efforts and proven qualities rather than by any innate and irreplaceable rights to influence the policy-making process. This created a tactical tension over the use of the media, which continued but with an increasingly educational focus.

**Table 6.3 Consequences for four environmental organizations of insider or outsider status in relation to policy communities in Kent (dichotomies not all relevant to each organization)**

<b>INSIDERS</b>	<b>OUTSIDERS</b>
Recognition, role, position and status within the policy community (and wider) CPRE, C.Com, KTNC	Inconsequential to the policy community:
Acknowledged role in the policy community KTNC, CPRE, C.Com	Denied a role within the policy community FOE
Co-operative and consultative relationship with decision-makers CPRE, C.Com, KTNC, FOE-sought	Adversarial and confrontational relationship with decision-makers FOE
Access to information used in policy-making KTNC, CPRE	Denied information circulating in the policy community
Informed of the policy agenda CPRE, C.Com	Unclear of the policy agenda or substituting rival policy agenda FOE
Voice in internal policy derivation KTNC, CPRE	Excluded from debate of policy agenda until proposals are made public FOE
Influence the wording of policy proposals C.Com, CPRE, KTNC	No influence on the wording of policy proposals
Seek routine or technical solutions as policy proposals C.Com	Seek radical solutions but with no power to introduce proposals into policy-making FOE
Institutionalized CPRE	Freelance FOE
Bound by accepted procedures C.Com, CPRE	Freedom to innovate in campaigning FOE
Avoid public and political controversy C.Com, KTNC	Attract public and political debate FOE
Involved in organizing crucial decisions out of politics	Use political routes to influence decisions FOE, CPRE
Defensive of role of policy community C.Com, CPRE	Dismissive of legitimacy of policy community
Minimum interference from outside, especially if high level of delegation to the community C.Com, KTNC	May be exposed to public scrutiny FOE

**Key:** C.Com: Countryside Commission; CPRE: Council for the Protection of Rural England; FOE: Friends of the Earth; KTNC: Kent Trust for Nature Conservation; listed in order of relative importance to the organizations.

**Distinctions derived from:** Grant, 1989; Laffin, 1986; Pross, 1986; Rhodes, 1986; M. Smith, 1990.

Within the observed policy communities, constituent members held different levels of privilege for influencing policy proposals. Prisoner and low profile insiders with the higher privilege would not be expected to risk their status through pressure group campaigns. The Countryside Commission certainly avoided this association, yet was able to disseminate publicity intended to influence policy. The Commission's prisoner insider status refers to its relation with central rather than local government. Though now an independent agency, it is still tied by its dependence on grant-in-aid to act within the general policy guidelines set down by central government for both countryside policy and local government.

The Council for the Protection of Rural England has evolved from an outsider pressure group to an accepted consultee in planning matters with a relatively low profile so as not to disturb intimate contacts. Recently, through higher profile national campaigns and apparent confidence in its insider status locally, the County Branch has increased its media-attracting campaigning. Similarly, many amenity groups (Buller, 1984; Gregory, 1976) hold a secure pedigree of established contacts with local government and yet, as representatives of public opinion, can publicly voice views which they would also expect to debate in a policy community.

Friends of the Earth were accustomed to vociferous campaigning unfettered by insider attachments to a policy community, but discovered the benefits of proffering the research-based expertise of the group and restraining their more confrontational criticisms. Their national campaign aimed at local government raised their status to potential insiders but, in Kent, without significant breakthroughs to insider status at local group level. Friends of the Earth, in seeking greater participation in policy communities, have become more cautious in their use of the media, all the more as their prestige based on reasoned argument has risen, but also because media reporters have been inclined to latch onto the conflictual elements of their public pronouncements. This more cautious approach has been chosen by the national campaigning staff of Friends of the Earth, although vociferous local groups scupper these aims in some instances. These groups are not ideologically disposed to compromise on matters of major principle which would risk alienating members who

tend to prefer active campaigning to protracted negotiation.

One reason why the studied organizations have moved towards more insider status than envisaged at the outset of the study is that the environment-related policy communities are more open than other policy communities. Environment-related policy communities have neither the power nor the wish to organize technical issues out of the political arena. Political input is essential to sustain the momentum of these policy communities. Also, there is a level of uncertainty about the likely direction of future environmental policy in a period of developing legislation and as discoveries are awaited on the most appropriate and feasible solutions to environmental problems. As a result, even though immersed in the procedures of achievable policy-making, these policy communities are quite open to the more radical ideas of the issue network.

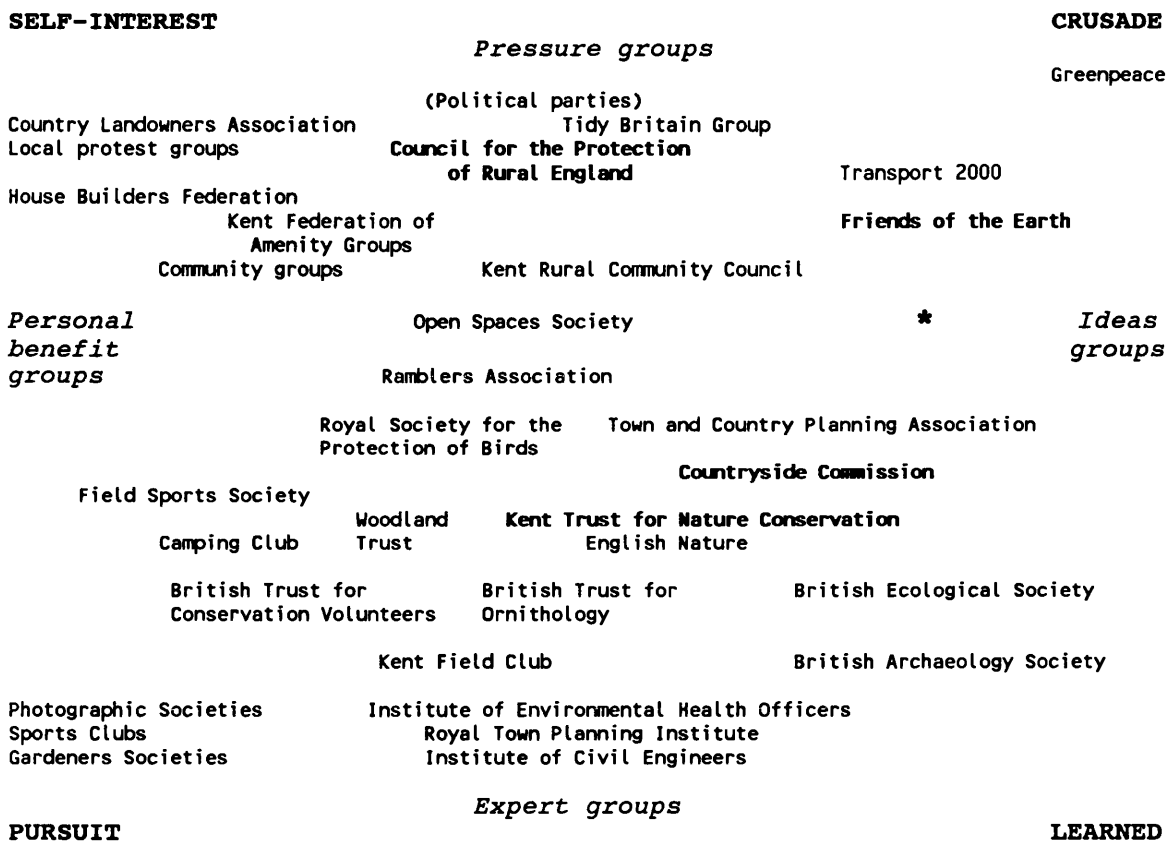
Environmental organizations are often the accepted vanguard through which new policy ideas enter the policy-making channels of local government. Examples include the success of nature conservation organizations in gaining local plan protection for Sites of Nature Conservation Interest and the introduction of a number of the recommendations of the *Environmental Charter for Local Government* into council policies. Items presently reaching the agenda of the environmental policy community from the issue network include the planned provision of leisure facilities, such as golf courses (Chatters, 1991), and of water supplies (Binnie and Partners, 1991; Payne, 1991), and issues of energy conservation (Fyson, 1991; Owens, 1991; A. Smith, 1990) and sustainability (Association of County Councils, 1991; Begg, 1991; Jacobs, 1990) and the greening of cities (Commission of the European Communities; Davidson, 1988; Davidson and MacEwen, 1983; Mather, 1990).

The evidence gathered in Kent suggests that a wide network of environmental organizations can gain ready access to a range of policy communities. They can be influential in both the formative and implementational stages of policy-making, without becoming incorporated in closed and constraining sub-governments and so retaining the freedom to express an independent viewpoint.

The network of environmental organizations

The environmental policy community is clearly much wider than the association of local government departments and the four organizations studied. An attempt to set these organizations in a wider framework applies the typology of interest groups developed in chapter three (Fig. 6.2).

**Fig. 6.2 Selected examples of environmental and other organizations in relation to the new typology of interest groups**




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Key: Based on Fig. 3.1; \* Point of convergence (see text)

Local government has traditionally relied on its own professional and political base for generating ideas for policy. It has consulted with representative groups, often those with a self-interest basis, as a means of achieving the legitimacy and popular support required of its democratic status. The environmental challenge has been articulated by a much wider body of opinion including expert groups of the learned category and, through the amenity value of the environment, also by some pursuit groups. The environment is a theme for crusading pressure groups, as well as some traditional pressure groups for whom environmental protection is a welcome label for justifying personally-enjoyed benefits. Faced with this welter of interest in the environment, local government has continued to consult groups in established policy communities. At the vanguard of environmental policy-making, local government has cultivated relationships with organizations which combine the expertise of more learned groups with a crusading zeal that some in local government are prepared to incorporate into public policy-making.

Environmental organizations, for their part, recognize the benefits of entry into the public policy-making arena. One means of achieving this is through acquiring the expertise, gained from careful research or practical work in environmental management, which is sought by local government. As a result there is a convergence of many environmental organizations towards the status of relatively high profile insiders. In the current climate of local government, this status is more likely to be achieved by groups that can develop towards the Ideas Group category. The Countryside Commission retains a low profile insider status close to this category while groups such as the Friends of the Earth have more recently developed furthest in this direction. A traditional pressure group such as the Council for the Protection of Rural England is also veering in this direction. From different origins in the pursuit and specialized knowledge arenas, the Kent Trust for Nature Conservation has developed crusading tendencies through its broad conservation and educational function. As a result it too is converging towards a similar position.

The selection of environmental organizations for detailed study was based on their contrasting characteristics. However, they, and many of the other interest groups

identified, have converging interests. As a result, they have become less distinct in terms of their status, role and behaviour in relation to local government. This trend is explained by shared concerns to influence public policy in order to achieve their objectives, and by recognition that success is more likely to be gained from inside than outside policy communities. Some of the convergence is produced by adaptation to the pre-requisites of membership of a policy community, some is produced through mutual accommodation in the interests of co-operation and the presentation of a united environmentalistic viewpoint.

### Is an effective environmental policy community developing?

An environmental policy community develops as a selection of interest groups, agencies and private companies and consultants are drawn from the environmental issue network into public policy-making. Local government, particularly at County level, provides the organizational framework for drawing together the components of the environmental issue network, and is an important nucleus on account of its enabling and consultative functions. There is a communality of interest in co-ordinated environmental policy which overcomes the narrow sectoral policies of local authority departments in which only specialized organizations are able to contribute to constituent policy communities. The combination of the collective goals of the environmental movement and the commitment to corporate management by local authorities betoken a way forward for holistic environmental policy.

Local government is better equipped to co-ordinate an environmental policy community where it has sought improved inter-departmental communication and where it has initiated council-wide policy statements and Action Plans on the environment. New approaches and structures have led to the juxtaposition of previously segregated officials and interest groups. These provide an impetus to a new environmental policy community. Alternatively, existing policy communities have been co-opted as the mechanism for developing environmental policy. Many of the policy communities with environmental interests are already open and interactive. They are

not, however, particularly powerful. These facts in themselves may be enough to explain some tendency towards the coalescence of complementary policy communities into an emerging environmental policy community.

The environmental policy community has not yet crystallized to become a sufficiently powerful policy core to unite the rather fragmented policy communities in the environmental policy-making arena. Because it is disparate, the environmental policy community does not have the adhesive power of existing policy communities, and its independent survival is not guaranteed. Experiments in new corporate structures which elevated the position of environmental policy have been tried, but in no case is their security certain; in some as in Swale, the mechanisms for establishing corporate environmental policy are already in the process of being dismantled. Whether the emerging environmental policy community retains a recognizable power base will depend on several factors:

- a) the ability of the environmental movement to articulate a coherent and united case for environmental planning;
- b) public support for environment-led policy, especially relative to economic policy, including membership of local environmental groups;
- c) an enhanced role in environmental planning for local government, however it is re-organized and resourced;
- d) a co-operative response from officials and politicians to the consultative involvement of a broad spectrum of environmental groups (or umbrella alliances) in policy-making.

Evidence collected during this study from local authorities in Kent and from environmental organizations with an interest in local government policy-making revealed several factors working for or against the further development of the environmental policy community (Table 6.4).



**Table 6.4 Factors acting for and against the development of the environmental policy community**

<b>FAVOURABLE FACTORS</b>	<b>OPPOSING FACTORS</b>
<b>a) Awareness of green issues</b>	
Technical recognition of the environmental challenge	Scientific scepticism or slow progress of verifiable environmental research
Public awareness of environmental issues	Preference for profligate life styles
Acceptance of green issues as a legitimate and priority policy aim	Opposition from rival policy communities to protective policies
Acceptance of the failure of existing policy	Demonstrated adequacy of existing policy and belief in ability of existing policy communities to find solutions
<b>b) Governmental attitudes</b>	
Environmentally sensitive legislation	Legislative restrictions on implementing authorities
Open government and information sharing	Managerial, secretive government
Commitment of expenditure and resources in support of environmental policy	Financial and other resource shortages to support environmental policy
<b>c) Local Government's response</b>	
Local government perception of environmental policy-making as a legitimizing function	Local government does not perceive the environment as a key popular issue
Political will and innovative policy-making - lead authorities	Political resistance based on alternative priorities - lag authorities
New mechanisms for environmental policy formulation, e.g. Environmental Charters	Inertia of existing policy arenas, tight control of committees and departments
New corporate structures of decision-making	Fragmentation of environmental responsibility
<b>d) Evolution of the environmental movement</b>	
Ideological power of the environmental movement (and educative role)	Structural power of vested interests
Pluralism based on mutual interest in the environment	Structural constraints do not take account of environmental impacts
Convergence in the objectives of the environmental movement	Fragmentation and conflict of goals in the environmental movement
<b>e) Emergence of an environmental policy community</b>	
Dependence of local government on environmental organizations for expertise, practical work or funding	Self-sufficiency of local government

While there has been an undoubted increase of awareness about environmental matters, there is considerable inertia in scientific validation, life style assumptions and the paradigms of existing, especially economic, policies. The environment has risen in importance on the agenda of many policy communities and there is greater co-operation between existing policy communities and a wider issue network. There is a general convergence of viewpoint amongst environmental organizations and some co-ordination of policies, although differences of emphasis remain. Local government has recognized the value of this network and has established a number of partnerships with environmental organizations.

The ideals of government-led environmental legislation with financial backing and open government are on the agenda but slow to materialize. At the local level of government there is great variability in the priority accorded to environmental policy and in willingness to accept the lead in devising new mechanisms and structures through which to produce effective environmental policies.

An environmental policy community centred on local government is developing where the contribution of environmental organizations is accommodated in policy derivation and implementation. In other cases, local government prefers to be self-sufficient and has been dismissive of an environmental policy community. The environmental policy community is still embryonic, yet trends have persisted and are likely to develop, so long as significant powers are retained at local government level. Local government has begun to respond to at least some features of the environmental challenge of the times, even though many in the environmental movement would wish to see more urgent and comprehensive policy responses.

The environmental movement (Lowe, 1988) has grown on the basis of the ideological power (M. Smith, 1990) underlying its philosophy but this is countered by the established structural power of vested interests. The convergence of pluralistic interest in the environment is far from complete as the environmental movement has not arrived at an agreed politics to challenge those existing structures that take less account of the environment in policy formulation.

Influential documents aimed at international or national audiences call for all policy-making to be assessed according to ecological and environmental principles with full valuation of environmental support mechanisms (International Union for the Conservation of Nature and Natural Resources, 1991; Pearce, Markandya and Barbier, 1989; Pearce, 1991). The evolution of environmental policy communities, at all levels of government, can assist in raising the issues and proposing solutions. The organizations involved have difficulty in gauging their effects on public policy given the plurality of influences. Their views are undoubtedly being taken into account, if only because they are often important agencies for implementing environmental policy and for legitimizing it publicly.

The ultimate test is in the outcome of environmental policy. This requires the sympathetic actions of economic interest groups, and the co-operation of individual citizens, as well as effective public policy at all levels of government. Environmentally-sensitive local action, and its widespread repetition, is essential; without it the global environment of man is doomed.

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## **APPENDIX ONE**

### **Example of postal questionnaire**

Own address  
Date

Representative's address

Dear

Re: **SAFEGUARDING KENT'S ENVIRONMENT QUESTIONNAIRE**

I am seeking your kind assistance in providing the answers to a questionnaire which I am sending to you in your capacity as a District Representative of the Council for the Protection of Rural England.

I will use the information in my thesis at the Bartlett School of Architecture and Planning, University College London:  
PLANNING ENVIRONMENTAL POLICY: a case study in Kent  
of local government and environmental groups.

I hope that my thesis will encourage further co-operation between local councils and environmental groups (being a member of both myself).

I envisage about 15 minutes of your time to complete the questionnaire. Your replies will be extremely useful in my task and I hope the resulting thesis will prove of interest to the CPRE.

I hope that I may get a more personal opportunity to thank you at future meetings of Kent CPRE.

Yours sincerely

T.P. Atkinson

Enc: Stamped addressed envelope  
2 page Questionnaire

SAFEGUARDING KENT'S ENVIRONMENT QUESTIONNAIRE

CPRE DISTRICT:

REPRESENTATIVE:

- 1) What are the main environmental concerns of members in your district?
  
- 2) From what sources do you get your information about the environment and how to care for it?
  
- 3) How do you campaign on environmental issues?

OTHER GROUPS

- 4a) What other environmental or amenity groups are you in contact with?
  
- 4b) Please explain the type of contact and how useful is it?
  
- 4c) How does your approach differ from theirs?
  
- 4d) What sort of contact do you have with other CPRE groups?

LOCAL GOVERNMENT AND THE ENVIRONMENT

5) How effective is your local authority in caring for the environment?

6a) How many contacts do you have with your local council in a year?:

TYPE OF CONTACT	<u>HOW MANY TIMES (in year approx.)</u>
by writing letters	_____
by telephone	_____
by visiting offices	_____
by invitation to offices	_____
by arranged site meeting	_____
other ways (please specify.....)	_____

6b) What proportion of the above, if any, is with councillors?

6c) What proportion of the above is with officers of the planning department?

6d) What other council departments do you contact, if any?

7a) What do you aim to achieve from your contacts with the council?

7b) What have been the main successes of representations to your council?

7c) What have been your main failures or disappointments?

8) What problems are there in getting a favourable response from the council?

9a) What is your local authority's policy on the environment?

9b) In what ways would you like to see this policy improved?

10a) Roughly how many planning applications do you look at per year?

10b) Where do you see them, and what proportion do you comment upon?

10c) What are the main issues you raise regarding the applications?

HOUSING LAND SUPPLY (please explain answers if possible)

11a) Is the rate of house building in your district acceptable?

11b) Are the houses built in the most suitable localities?

11c) Where should development be concentrated?

12) Please add any further information not covered above over the page:

WITH VERY MANY THANKS FOR YOUR HELP

## APPENDIX TWO

**Correlation coefficients between environmental organizations from Table 5.3 for Figure 5.1**

	CPRE	KTNC	CCom	FOE	Amen	EH	NT	EN	GW	NRA	RSPB	BTCV
CPRE		-19	15	-49	46	16	17	16	-58	8	14	-61
KTNC			8	-2	6	38	20	49	24	48	42	21
CCom				11	-20	67	20	78	21	70	10	-14
FOE					-21	-33	-56	4	26	1	-19	7
Amen						19	36	-2	-27	-11	17	-6
EH							80	76	18	28	49	2
NT								30	3	7	33	7
EN									29	74	52	5
GW										44	-21	76
NRA											16	16
RSPB												-6
BTCV												

**Scale:** Numbers are correlation coefficients multiplied by one hundred.

**Key:** BTCV: British Trust for Conservation Volunteers; CPRE: Council for the Protection of Rural England; KTNC: Kent Trust for Nature Conservation; CCom: Countryside Commission; FOE: Friends of the Earth; Amen: Amenity Groups and Societies/Civic Trust; EH: English Heritage; EN: English Nature; GW: Groundwork Trust; NRA: National Rivers Authority; NT: National Trust; RSPB: Royal Society for the Protection of Birds.