Select Committee on the Natural Environment and Rural Communities Act 2006

Corrected oral evidence: Natural Environment and Rural Communities Act 2006

Tuesday 7 November 2017
12.05 pm

Watch the meeting

Members present: Lord Cameron of Dillington (The Chairman); Baroness Byford; Earl of Caithness; Lord Cavendish of Furness; Viscount Chandos; Lord Faulkner of Worcester; Countess of Mar; Baroness Whitaker.

Evidence Session No. 13 Heard in Public Questions 107 - 116

Witnesses

I: Mr Daryl Phillips, Joint Chief Executive of Hart District Council and the District Councils’ Network Chief Executive Planning Lead; Councillor Ian Stewart, Deputy Leader, Cumbria County Council and Spokesman on Environment and Communities for the County Councils Network.
Examination of witnesses

Mr Daryl Phillips and Councillor Ian Stewart.

Q107 The Chairman: Thank you both very much for coming to see us, all the way from Cumbria and the M3. It is very good of you to come in. You have in front of you a list of interests declared by members of the Committee. The meeting is being broadcast live via the parliamentary website. A transcript of the meeting will be taken and published on the Committee’s website. You will have the opportunity to make corrections to it where necessary. I am told that there might be a vote at some point during the session. If there is, I am afraid we will have to pause the session, but I hope we will not. Everyone is saying that there will be no vote.

Before I ask the first question, Lord Cavendish wanted to say something.

Lord Cavendish of Furness: In addition to my declared interests, my family is closely involved in Cumbria with negotiations with Natural England in respect of coastal access. Accordingly, and on the advice of the clerk, I am not taking part in this session, despite the fact that I would very much like to engage with my distinguished near-neighbour.

Q108 The Chairman: My first question to both of you—do not feel that you both have to answer every question; you can divvy them up—is: to what extent does government policy take proper account of the needs of rural areas? Is there sufficient co-ordination of rural policy across Whitehall departments and vertically between central and local government?

Daryl Phillips: My initial reaction is that it is rather disjointed. Part of the problem that I perceive and I pick up, particularly as a district council is a planning authority, is that there is no consistency with an objective. Rural policy is a difficult issue that people push about. It is broken up into compartments and various people deal with the compartments. I do not think that any of us grasp the living, working countryside concept. A lot of interest groups have views about how they see the countryside, but I am not sure the Government as a whole see it in the same way as the growth agenda.

Councillor Ian Stewart: I will be more succinct and say that no, departments do not understand. There are bits of government that perhaps do understand, but as a collective it does not. The main reason for that may be that civil servants do not understand the complexities of rural communities and rural living.

The Chairman: So what do we do about it?

Councillor Ian Stewart: You can all go to Alston and you will have a wonderful time. It might take you a little while to get there and to get back, but that is what rural communities are about—the isolation. The more of you good, distinguished folk who spread your wings, and take civil servants with you, the better.

Q109 The Chairman: To what extent have local authorities and LEPs taken
over the responsibilities for representing the countryside from the Countryside Agency and then the RDAs? Have the essentials of rural policy and rural delivery been lost?

**Councillor Ian Stewart:** I will start with the LEPs. My experience of LEPs—I work quite closely in another area with the LEP network—is that rural aspects are not high on their agenda, let us put it that way. I listened to the previous session. Growth is the driver of all the Government have, and growth is seen as the domain of places where there is critical mass—in other words, the cities—whereas many of us, particularly through the county council network, would turn round and say, “Well, actually, the greatest potential for growth is in the rural areas”. LEPs do not get that, with all due respect. Who is there to pursue policies for rural areas? I am not quite sure. I certainly know that local government has no money. At county council level, we have no money.

**The Chairman:** Mr Phillips, do you want to answer that question from the point of view of a slightly less remote area?

**Daryl Phillips:** It depends on what you see the countryside as. Clearly, the country needs to grow. We understand that. But the countryside is not just about growth, it is a place where people live; it is socioeconomic as well. One has to understand who is living in the countryside and its purpose. The LEPs do a good job—I am a supporter of LEPs in principle—but they are so strategic in looking just at the economic side of things. There is now no link back to who lives in the countryside and their well-being.

I am not saying that the past was perfect. I am not sure it was. In 2008, Matthew Taylor wrote a very good report for the then Labour Government about the living and working countryside. He was trying to pick up the fact that it is not just about looking pretty, it is not just about a little bit of rural industry in the corner; it is about people living in it and being squeezed out.

My area is slightly different from Cumbria. I am in the south-east, and we have completely different dynamics in the countryside. We have very little local employment. The countryside is becoming the place where the rich people can live and the poor people live in the town. The retirement age is actually causing a bigger problem. In five or 10 years’ time, we will struggle with support services for the ageing population in the countryside who have retired to it. They are not—to put it politely—the original indigenous people. They are people who have come out of London or can afford to live there. Policy is actually very weak when it comes to dealing with those issues. It is not necessarily about growth. Employment is important, but I am not sure that the people living in the south-east part of the country are actually the people who work in the countryside; they travel.

**The Chairman:** In terms of bodies, can the local authorities not take over the co-ordinating role of the various strands of rural policy, or is that too much to ask?
**Daryl Phillips:** I think you have to go higher than local authorities. Local authorities are very parochial. They are small in shape. County councils have a good role in strategic co-ordination, although they are more administrative boundaries for history’s sake. Combined authorities may well be the way forward, because they look across boundaries. LEPs are too high up. They look at growth in its own context but strategically at quite large areas. I do not think that one size fits all. That is why I would not say that we should go back to having a single body covering the whole country. Localism requires you to look more carefully at different requirements in different areas, but we need to look at more than just district council level. It has to be much more strategic than that, but it has to be co-ordinated and it has to look at the real issues for those areas.

**Baroness Byford:** May I pick you up on the issue of LEPs and money being available? I am in Leicestershire, so I am between the two of you. If my memory serves me correctly, the LEPs were making it common knowledge in our local newspaper fairly recently that money was available for rural communities to develop business or whatever. It was not a huge amount of money, but it is there. Occasionally, local communities do not make use of some of the funds that are there to be used.

Secondly, so many of the new small and medium-sized enterprises are in fact set up in rural areas. I accept what you said, but it is not just a question of older people retiring; there are quite a few people living in those areas who are entrepreneurs and want to get on with it, and some of this growth money or LEPs money would make a huge difference. I do not know. That may be a different area.

**Councillor Ian Stewart:** LEPs money - now that is an interesting concept; the money that has gone to LEPs is either from central government or alternately money that is available via the LEPs, which is European money. There is the concept that the LEPs have some money and are funnels through which other money is channelled.

Leicestershire is interesting. At the end of the day, it is all about money and the disparity between how much government funds urban areas and how much it funds rural areas.

Last year, Leicestershire County Council produced a very interesting report—we will be very happy to make sure you have it—which shows the level of funding for county areas compared to urban areas. If I may, I will read from it. County Councils Network research found that county residents, including districts, received £292 less per resident than London councils and £166 less than metropolitan councils. Because of that, council tax bills in rural areas, in county areas, are considerably higher.

I will expand on that with data on public health and public health allocations, which I hope you will find of interest. Every year, I think in December, the public health allocations come out, and the range of is between £31 and £178 per head. That seems a very large range. In fact,
of the 13 local authorities that receive more than £100 per head of population, eight are in London, and top of the list at £187 is the City of London, that well-known place of deprivation and lack of public health. For Westminster it is £128. The national average is £59 a head.

I contrast that with places that receive below £50 per head, of which there are 46. Bottom of the pile is Surrey at £31 a head; East Riding of Yorkshire—a large place—at £32; Wiltshire at £36 a head; Devon at £37 a head; North Yorkshire at £37 a head; Cumbria at £38 a head. You can see where I am going. If you look at the comparator, you find very clearly that rural England is getting a much less good deal from central government.

**The Chairman:** Who ought to be making the case for rural areas in what I call the sparse argument, the health arguments, and the rural-proofing arguments generally? If there should be a body making that case, how do we make it independent, how do we make it effective, where do we put it in government? Do you have ideas on that? You said that you feel that we need some voice for the countryside—

**Councillor Ian Stewart:** Absolutely.

**The Chairman:** —and Mr Phillips said that he did not think that a national body was particularly necessary. So there is a divergence of opinion.

**Councillor Ian Stewart:** Counties and districts often disagree, even though we serve the same people.

**Daryl Phillips:** I am not sure that we totally disagree, actually.

**The Chairman:** Do you want to discuss that, then?

**Councillor Ian Stewart:** I think it needs to sit in the Cabinet Office, because it needs to be pan-government. I have no idea what it would be or what it would look like, but something needs to be done, because what we have at the moment is not working for the vast majority of people in rural areas.

**Daryl Phillips:** That is probably right. If you are going to put it at the national level, it has to be high-profile. I certainly would not want to encourage it being put it back into Defra, because it is not about agriculture. We need to move away from the countryside being just about agriculture, and in the public perception, too. So it needs a higher profile. I would not stick it in economic development, because we also need the social part that comes with it. If there is going to be an agency, it has to cut across all government departments. I stress that one size does not fit all. Cumbria’s issues have some commonality with the south-east, but it has distinct issues, and there is the danger of a one-brush policy across the whole lot, which I would be keen to avoid.

**Baroness Whitaker:** I quite understand your arguments for siting this body in the Cabinet Office, but the Cabinet Office has no programmes or
implementation capacity. Do you not see that as a weakness?

**Councillor Ian Stewart:** It is an influencer; it has the opportunity to influence at the centre of government. What we are trying to say is that rural England, rural communities and the people who live there, deserve to have their voice heard at the centre of government. If you are looking for the centre of government, the eye will often land on the Cabinet Office. That is a half-answer. I am really sorry about that.

Q110 **Lord Faulkner of Worcester:** This is a question for Councillor Stewart and is about the English coast path, which has been held up in written evidence to us by organisations as widespread as the Open Spaces Society and a couple of county councils as a very good example of how Natural England has helped to improve access for the public good. Is that a view that you take in Cumbria?

**Councillor Ian Stewart:** A qualified yes. While Lord Cavendish is on the north side of Morecambe Bay looking down on Heysham power station, I am on the southern shores of Morecambe Bay looking up to the hills of Cumbria, so we both have an interest in the route around Morecambe Bay. What has disappointed me is the fact that my bit of Morecambe Bay, which is right at the head of the bay, is in an estuary. Natural England has a duty to have regard to the coastal areas but only has powers with regard to the estuary area, and it has decided that the coastal path will not come to the head of the estuary because there is what it describes as a ferry between Arnside and Grange. That ferry is in fact a railway that runs infrequently, so the decision is really strange, unless you can imagine a ferry being a train. What has concerned me most is its lack of engagement with local communities about where the coastal path between Silecroft and Silverdale will run.

The communities that I represent have not been engaged with this. I was proactive in seeking a meeting with an officer of Natural England, but it had no intention of having a conversation with communities because it did not have the capacity. It has been stripped of people, so there is no capacity to undertake the engagement that it would really want.

**Lord Faulkner of Worcester:** Okay, that is helpful. Another of our witnesses has said that it was great that funding was provided to set up the coastal path, but there is no evidence as yet of long-term funding to maintain it. Do you share that view?

**Councillor Ian Stewart:** Absolutely. Who pays for the maintenance is a big problem. It is not a highway, and certainly from the perspective of Cumbria County Council, I do not have the money to be able to undertake the maintenance. In fact, we are still having difficulties following the storm of December 2015, known as Storm Desmond. It was estimated that some £15 million of devastation was caused to footpaths and bridges on rights of way, of which £5 million was within the Lake District National Park geography and £10 million was outwith the national park. Strangely, the then Prime Minister flew in by helicopter to Grasmere and decided that £1 million would be made available. I am sorry, but that...
is not enough. Recently we got another £4 million, but again there is a disparity in that £3 million of that has gone to the national park and £1 million to the county council. We are still struggling to recreate the bridges and paths from two years ago.

Lord Faulkner of Worcester: Mr Phillips may have a view on my second supplementary question. Do you have a sense that Natural England has focused so much on coastal paths that that has been at the expense of other work that it should have been doing?

Councillor Ian Stewart: I will just say a quick yes to that.

Lord Faulkner of Worcester: The view from the outside, perhaps, Mr Phillips.

Daryl Phillips: I have seen no diminution of its input into other issues that we come across.

Councillor Ian Stewart: I think it is a capacity problem, and we are back to the lack of resource for Natural England to be able to do what it wants to do and what might be expected of it.

Q111 The Earl of Caithness: Mr Phillips, you have covered a lot of areas. Have you noticed a change in the way that Natural England has performed its role as a planning consultee over the last 10 years?

Daryl Phillips: I have a lot of time for Natural England. It does quite a good job in certain key areas. I would say, though, that the organisation is only as good as the people in it. It is a statutory consultee in a number of areas on development proposals where we have to consult with it. We are now finding some inconsistency of advice and that as an interest group it is vociferous about its point of view being reflected in planning decisions. The difficulty lies in getting Natural England representatives to turn up at planning appeals to support its position. It is easy to raise an objection and be very strong in that, and the district council will agree because obviously it is the Government’s adviser. However, we need experts to turn up and support refusals when they go through.

Natural England is starting to rely more and more on standing advice, which to me undermines the whole purpose of having a statutory consultee. Standing advice means a template letter that comes back with a little input into the nature of the individual application, but the rest of it consists of, “You can get advice from … ”, and then you are told where you can go to get further advice. My question is this: why did we consult you in the first place? What is the value of the input when I have to go and find it myself? Time is spent trying to get advice out of the body, and then time is spent by planning officers and developers running around trying to work out what it meant. If the standing advice is not crystal clear—of course, it can never be crystal clear, because it has to be interpreted—and you have someone who is trying to interpret advice about a protected species, it is inevitable that they will not always get it right. That creates conflict coming through. The difficulty is engaging with someone who can follow it consistently through at the right level.
Consultee responses are timely, because a standard template is being used. It is not the speed of the response but its value that I question.

**The Earl of Caithness:** You said at the start that Natural England is good in certain key areas. Which areas is it good at? Is it good on biodiversity and landscape issues, or AONBs?

**Daryl Phillips:** We in Herts, along with a number of authorities across the south-east, have the Thames basin heaths special protection area. Clearly that has been a significant block on development in its own right. There are lots of nuances in how to approach and mitigate it. I have found the body to be helpful in trying to find a way forward to allow development to take place as a strategy. The Thames basin heaths SPA has a strategic board through which it has an input.

On landscape and protected species, Natural England drops away with its standing advice. You do not get much of a contribution towards those issues unless, to put it politely, it is bleeding obvious. The rest of it is, “Here you go. Find it for yourself”.

On biodiversity, Natural England takes a step back and says that it has not actually done a biodiversity check. My authority is lucky that we have put resources into that and we share a biodiversity service with our neighbouring authority. We are going to expand that service by looking at offsetting opportunities and so on. We are doing that not because of Natural England’s input but because we think it is the right thing to do. That is where you need to have Natural England’s support coming through, and the districts need to be encouraged to take it on.

Money can be saved by working with neighbouring authorities and sharing services because they are quite expensive. My neighbouring authority does not have much biodiversity to worry about because it is urban, although it does have a green infrastructure. Their sharing of the resources with us means that we cover them off. We are thinking about growing this.

**The Earl of Caithness:** Do you agree, Councillor Stewart?

**Councillor Ian Stewart:** The problem with biodiversity is again a problem of resource. Cumbria County Council has reduced its capacity considerably. Is it sufficiently embedded in people’s psyches that they are aware of these things? Probably not yet, and so we could probably do with a bit more oomph to increase it.

**Viscount Chandos:** How have spending cuts affected Natural England’s ability to work with partners such as local authorities?

**Councillor Ian Stewart:** It will be interesting to see what its staffing is today as compared with, shall we say, when the body was commenced. I do not have the data, but it might be something that the Committee wants to investigate.
**Daryl Phillips:** From my perspective, this goes back to the standing advice position. Natural England badged it as an improved service, but it is not. It is actually a tick-box exercise of checking spreadsheets. Obviously you will not see it outside the organisation, but as Councillor Stewart mentioned earlier, it is a capacity issue. It is about trying to get people to come and engage with you. We all have to look carefully at how we use our resources and Natural England has to look at who can participate at what sort of meetings. That is where the difficulty lies: getting people to meetings where five or six years ago there would have been more options. Nowadays you are limited to who it has available. We understand that.

**Viscount Chandos:** Are you seeing extra pressure on the planning departments of local authorities as a result?

**Daryl Phillips:** Yes, because we are getting our own independent consultative advice on applicants’ proposals. In the past you would have relied on Natural England’s input to lead the discussion. Now we are probably missing out that part and just going straight out to consultation. We are picking up the bill in a different way, or rather the applicant is picking up the bill through the planning application fee.

**The Countess of Mar:** Has the pool of knowledge you tap into with Natural England collapsed somewhat? We have had quite a lot of evidence that it does not know as much as it used to, particularly about the local areas that it is working in.

**Daryl Phillips:** You are probably right. I have no direct knowledge of how they handle it, but I think you are right. I suspect that it is not just a capacity issue but a funding issue. As we know, specialist knowledge goes to the highest payer. We know that quite a few developers, quite rightly, are now picking up specialist advice and the companies are doing rather well because that is where the people are going to go. It leaves local authorities with the same problems. It is a bit like having planning officers; it is the same argument. Sometimes you go where you think you will get the best financial return in your career, which is a legitimate objective. I do not think that Natural England is in any more difficulty than the rest of us.

**Councillor Ian Stewart:** Yes, it is not unique in that.

**Baroness Byford:** Returning to biodiversity and the phrase “having regard to”, Mr Stewart, you sat in on the previous session so you will have heard the suggestion that “must” should be included in that to give it greater direction than it has currently. If you have regard to something, you may have looked at it but may have taken no action as a result of it, and “must” might actually lead to action at the end of it. I would be grateful for your comments.

**Councillor Ian Stewart:** It is a real challenge. Would “must” improve the outcomes? Probably. Would that create greater challenges for local
authorities? Definitely. Would I want a “must” that would create greater challenges for local government? I think I will just park that one, if I may.

**Daryl Phillips:** My answer would be that we are just playing with words. As local authorities, developers and people who live and work in the countryside, we need to be clear about what exactly biodiversity is. There is a general misunderstanding across communities about what it means. Sometimes it is nature conservation, sometimes it is soil quality. There are all sorts of issues that go into it. There is a big issue with education so that people understand it. Some will use it as a tool to stop what they do not want, others could use it as a tool to promote what they do want, but you can ignore bits of it if you are not clear about what it is all about.

There is much more that we could do on understanding biodiversity and how it is brought out on the ground, and then having positive proposals for how to deal with it. It should not be used as a tool to stop appropriate development, as some will try to do. Again, it is easy for it to slip through the net and just be ignored. I do not think that changing the word to “must” achieves the real objectives. I agree that playing with the wording would give it more force, but we ought to be pushing for it to be understood far better.

**Baroness Byford:** But it would make it a legal requirement if it were in law.

**Councillor Ian Stewart:** But in the implementation people will find ways to diminish that.

**Baroness Byford:** At the moment it is not happening anyway.

**Councillor Ian Stewart:** No.

**Daryl Phillips:** Not in certain areas.

**Baroness Byford:** There is an interesting point there. One problem that we heard about in our earlier evidence is that there are lots of people doing research and collecting data, but some of it is perhaps not as good as other data. Do you have any views on where you go for the grounding on which you base your judgments? Clearly, data is available, but it varies in different places.

**Daryl Phillips:** Having a central core for data and its quality control would be of great value, the difficulty being that so much data can conflict. You are never really sure how robust the collection of that data and its interpretation were. As soon as we go down the statutory route with biodiversity, we ought to be very clear about the background to it. That is where a central resource, or an authoritative resource, would be very useful, rather than people picking out the bits they want from the data or one not being sure that they did it in the proper way. You are right that data can vary from area to area. I would like to see a central resource for that, which gives a stamp of approval, so that is your starting point, rather than ending up with different interpretations. Both might be right; it just depends on how you take it.
Baroness Byford: You would have that as an independent body.

Daryl Phillips: Yes. I think that is key.

Councillor Ian Stewart: How would you pay for that? Where would the money come from?

Baroness Byford: I can rephrase the question if you wish me to.

Daryl Phillips: Because we have to use the data, we are already spending time collecting and analysing it. There is an opportunity to redirect some of that time, and it could be more cost-effective if it were put into a smaller arrangement where you could access it as a single point of contact. I do not think it will necessarily generate any additional cost; it might reduce your costs in trying to explore the data.

Baroness Byford: Yes, and sharing the data across areas, as you have mentioned, might also save costs.

Q114 Baroness Whitaker: I think Mr Phillips has partly answered my question by saying that the biodiversity duty is not terribly widely understood. I do not know whether Councillor Stewart shares his view. You do? How do both of you think that awareness and implementation of the duty could be improved? Some recommendations would be helpful.

Councillor Ian Stewart: After you. I always defer to a joint chief executive.

Daryl Phillips: We deliberately undertake a programme of education by going into schools and starting at the youngest age possible. We try subtly to educate people about what they are looking at. Nature as a whole needs that. The biodiversity officer for the council does it for both districts and is busy at the weekends, deliberately trying at the bottom end to encourage people to understand what is going on. We also run programmes for councillors and developers to help them understand about diversity. Quite a few of the agents we deal with are small. They do not have the time to run their own training courses, which can be prohibitively expensive, so we also run training programmes for them. They can then share what we see. I have to stress that. We are trying to help them to start thinking about diversity at an earlier stage.

District councils, with county councils, can come up with shared experiences to help to educate people in what we are looking at and help understanding to grow. You do not need a top-down approach; it is more of a bottom-up one.

Councillor Ian Stewart: At the level below principal authorities are the parish councils. The more that is understood at the parish council level, the better it is. That is something for NERC to take on board.

Baroness Whitaker: Do you think the gaps are found among the elected officers or more with the permanent officials?
Councillor Ian Stewart: If you increase understanding among the elected members, it helps to encourage the officers to do what is needed.

Daryl Phillips: I agree. The problem is that if you are a planning officer, you are focused on planning. However, you have so many inputs coming in where you have to rely on other advice, and you have to try to assimilate that to make a recommendation. You really do need quite a push with planning departments to understand all these issues. The training is also for members, because they have to take the ultimate decisions, although I also support the idea of training at the parish council level because inputs come into the planning process from there. There has to be proper training all the way through so that people understand the issues. It is not about picking out one group and saying, “Off you go”. It should be more complete. You are talking about multiple inputs into a process, and all those inputs ought to understand it.

Q115 The Countess of Mar: We have had a large number of submissions about the problems with Section 67(2) of the NERC Act, which concerns green lanes and motorised vehicles. Why does the approach to using traffic regulation orders to limit the use of green lanes by motor vehicles vary between different highway authorities and national park authorities? Are any reforms required to make the process of maintaining a TRO more effective?

Councillor Ian Stewart: I think it is probably to do with the lack of clarity, which gives the opportunity for local interpretation. If I may, I will dump this one on Mr Phillips for a minute while I get the response that was given to me by an officer of the county council, which contrasted what happens in the Lake District National Park with what happens in the Yorkshire Dales National Park, as well as at Cumbria council level. If you imagine the map, you will see that these three bodies are all very proximate.

Daryl Phillips: On traffic orders, and slightly passing the buck back again, of course the highway authority is the county council. Only if the county council has an agency with the district council do traffic orders get passed down, and even then there are certain restrictions. The difficulty is that the core legal situation under the Act is basic, and it allows for interpretation. People want to interpret it based on their local circumstances, so there is no consistency across the counties, which is as you would expect. It is not meant to be prescriptive, and there is an allowance for local interpretation. It really comes down to what you are trying to achieve and how. Some will look at it from a cost point of view, quite a few will look at it from an enforcement point of view, while others will consider the safety point of view. They are not all the same. It comes down to the attitude of mind of those who have the power: namely, what is their priority? I know that Hampshire is very much a safety-first county before it starts on traffic orders as a principle. Congestion is not its problem.

Rights of way are a nightmare to enforce and administer. Sometimes people shy away from difficult tasks, because with them you create a rod
for your own back and there is no easy answer. Every county will be different in the emphasis that they put on the section. It will depend on what worries them.

**The Countess of Mar:** Many of the complainants have been horse riders and pedestrians. We have been shown horrendous pictures of lanes that have been ground up by 4x4s.

**Councillor Ian Stewart:** Absolutely. In the Lake District part of Cumbria, there is a voluntary arrangement whereby no more than four 4x4s will go in a convoy. We have voluntary arrangements in the Lake District. In the county council area, there is a code, which again is a voluntary arrangement. It is a different code. The recently expanded Yorkshire Dales National Park, which eats quite considerably into my county, has yet another code. It is all a little bit confusing, and if there is one thing that we absolutely need it is clarity and consistency, but that we do not have.

**The Chairman:** Should that come from central government?

**Councillor Ian Stewart:** Some sort of standard might be appropriate. You have talked about costs and enforcement. I calculate that the enforcement of a traffic regulation order is around £2,000, and one of the big costs in that is the need to advertise it. Newspaper advertising is expensive.

**The Earl of Caithness:** I want to go back to the subject touched on by Lady Byford and Lady Whitaker. As the custodians of local government, would you find it easier to do the job of protecting the environment and biodiversity if you opted to move to a natural capital approach rather than the current approach?

**Councillor Ian Stewart:** I am very happy to come back with a written response on that.

**Q116 The Chairman:** I have one final all-encompassing question. What one recommendation would you like to see made in our final report?

**Councillor Ian Stewart:** I am fully aware of the implementation review by Lord Cameron that was published in January 2015, and some of its recommendations look about right. But, overall, what we need is a more joined-up approach to rural policy. My absolute plea is to have equal funding for county residents. At the moment, it is not fair.

**Daryl Phillips:** I think that rural policy is disparate and has lost its focus. There are too many interest groups looking at certain aspects but not in a joined-up way. We need to bring them back into a more structured and focused approach, because otherwise the rural areas will slip through a gap.

**The Chairman:** Thank you both very much.