



RTPI

mediation of space · making of place

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Department of Environment, Food and Rural Affairs
Natural Environment White Paper Team
Area 3D, Nobel House
17 Smith Square
London
SW1P 3JR

Email response sent to: naturalenvironment@defra.gsi.gov.uk

Dear Sir/Madam,

RESPONSE TO: AN INVITATION TO SHAPE THE NATURAL ENVIRONMENT OF ENGLAND

Thank you for the opportunity to respond to the above consultation. The Royal Town Planning Institute (RTPI) represents over 22,000 spatial planners, existing to advance the science and art of town planning for the benefit of the public.

We welcome this opportunity to help shape the Natural Environment of England through the proposed White Paper. This response has been formed drawing on expertise of the RTPI's Environmental Planning and Protection Network.

While not an environmental campaigning body, the RTPI's public interest mandate demands that we ensure that planning policies and systems are responsive to the need to protect environmental resources, including biodiversity. We are therefore supportive of government taking steps to ensure the maintenance and enhancement of the natural environment through government policy, building on existing local authority best practice and effective citizenship, and we recognise and support the role of planning in this regard.

We believe that much can be drawn from the first environmental white paper, This Common Inheritance (1990) and believe that Planning Policy Guidance 9 (PPG9) should be updated to coincide with the new white paper.

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Furthermore there are lessons to be learned in the management of the use of land, whether through the planning system or not, from more recent thinking, and we would commend the ecosystems services approach and the multi-functional value of land and property set out for example in the BIS/Foresight report “Land Use Futures”.

Our response to individual questions is detailed below.

The RTPI’s Environmental Planning and Protection Network would be happy to discuss this submission or further assist with drafting the white paper. If you require further assistance, or have any queries relating to the enclosed or require clarification of any points made, please contact the Planning Policy and Practice Team on 020 7929 9466 or email england.policy@rtpi.org.uk.

Yours faithfully,

A handwritten signature in black ink, appearing to read 'Matt Thomson', with a long horizontal flourish extending to the right.

Matt Thomson
Head of Policy and Practice
Enc.

Q1. What do we need to do to embed the true value of our natural resources in decision making at all levels?

The true values of the natural environment must be firmly and irrevocably embedded within the Natural Environment White Paper and eventually enshrined in law (an Eco-Duty). In particular, This Common Inheritance (1990) must be remembered as the first comprehensive white paper on environmental policies. It was intended to examine the challenges that the UK would face up to 2010.

We believe that the best way of embedding the true value of our natural resources into decision making at all levels (including all government departments) is by:

- Analysing achievements over the past 20 years from This Common Inheritance;
- Avoiding putting these achievements at risk as part of the government's spending review;
- Building constructively on their strengths and opportunities;
- Recognising that the evidence base on the environment is much stronger than it was in 1990, which should ensure greater environmental priorities in decision making, including within the planning system, in order to put the value of the natural environment at the heart of government policy.

There is also a need to consider the relationship of the natural environment within the current UK Strategy for Sustainable Development, of which the UK has been a part since 1994, and how the new environment white paper will relate to it.

The Lawton Review on the natural environment (September, 2010) must become a key ingredient of the new white paper, as well as being embedded within the subsequent revision of Planning Policy Statement 9 (PPS9).

Q2. Have we considered the right overarching challenges for the White Paper to consider?

a. If not, what should we focus on?

b. How should we approach these challenges?

The overarching challenges are as much to do with political ideology as they are with the natural environment. The natural environment requires a consensus approach across all political parties. The broad issues have remained fundamentally similar, give or take some shifts and adjustments in emphasis. The Coalition Government has demonstrated its recognition of the multiple values of the natural world; the variety of its value for people, and the importance of the ecosystems approach to both individuals and communities. The Secretary of State (Caroline Spelman) has stressed both the personal and national values of the natural world and how a vibrant natural environment 'is a necessity for economic recovery and sustainable growth for the long term' (Foreword).

The three critical issues from 1990 - development v. conservation; economic growth v. natural resources and pollution v. jeopardising economic growth - are broadly compatible with the overarching and interconnected challenges of today – climate change, demographics and incremental impacts from habitat fragmentation, inappropriate land management, environmental pollution and planning decisions.

The added challenge is that of the political message and delivery mechanism. It is necessary to sharply demonstrate how a new shift in political power from the centre ‘to unlock the potential of local communities, local councils, businesses, consumers and civil society into playing a greater role’ (page 2), will ‘put the value of our natural environment at the heart of government policy making’ (Foreword).

A consensus approach across all political parties would be valuable in helping to build on where we are at the moment. For example, in the UK we are not good at connecting up networks of wildlife sites or of creative conservation in general.

There is more work to be done on soils, including connecting up with the Construction Code of Practice for the Sustainable Use of Soils on Construction Sites, and the specific soils toolkit for planners that was being prepared by Defra earlier this year, to enable planning to play ‘a more significant role in protecting soil and its functions’ (p 12/13). Improvements are also needed in the soil protection review as part of cross compliance for farmers.

Q3. What are the existing policies and practices aimed at protecting England’s natural assets (including but not limited to biodiversity, seas, water bodies, air and soil) that currently work most effectively?

a. What works less well? What could we stop doing or do differently?

Protecting the very best biodiversity sites is generally good under the present system but they are poorly connected in networks and with little creative conservation. It would be helpful to have a SWOT (strengths, weaknesses, opportunities and threats) analysis of the effectiveness over the past 20 years of the earlier white paper, This Common Inheritance. From a purely planning perspective, an assessment of the effectiveness of PPS9 would also be valuable, providing an opportunity to build on the best parts of it.

An assessment of the value of the current Campaign for the Farmed Environment, set up in connection with the previous government, would also highlight how well or otherwise this is working. While 68% of English farmers admit to having heard of it, only 33% have done anything about it (Farmers Weekly, 9th July, pp 20-1). This may force a rethink on a return to compulsory set aside. Maintaining Higher Level Stewardship funds in the spending review will have a significant and positive impact on biodiversity, landscape, cultural heritage, soils and water quality (Farmers Weekly 27th August, pp14-5).

Q4. What mechanisms should we focus on to ensure we manage our natural systems more effectively in future?

a. How should we define success?

b. How can we agree on common goals and assess our progress towards them?

It is important to focus on a combination of effective monitoring, review and policy enforcement, centred on PPS9, Stewardship, Cross Compliance and the Campaign for the Farmed Environment. The aims must be to reduce the reversal of priority habitats and the number of species under threat. There is also a need to build in the cost of environmental degradation to business costs,

including farming, stressing that the natural environment is not a free resource.

Q5. How best can we reduce our footprint on the natural environment abroad, through the goods, services and products we use?

The consultation document rightly recognises the importance of reducing our footprint abroad. The costs of using the developing world to do our 'growing' and 'manufacturing' must include an environmental cost in an attempt to ensure that the environment stays healthy. It is worth mentioning the Toronto experience in Canada, where the Toronto and Region Conservation Authority's Terrestrial Natural Heritage System strategy is cutting edge. It actually models the health of the natural system in Toronto based on shape, size and the influence of adjacent land uses. It makes recommendations for improving the ecological health in urban, suburban and rural settings (<http://www.trca.on.ca/protect/land/terrestrial-natural-heritage/>).

Q6. What best practice and innovative approaches to protecting and enhancing our natural environment do you think should be considered as we develop the White Paper?

It is important to build on past experience through evaluation of the earlier 1990 white paper on the environment. There is very useful good practice already available in local authorities to reduce the impact of development on biodiversity. This is an opportunity to bring together the range of good practice from local planning authorities and to require it to become mandatory within a necessary update of PPS9. Good practice ranges from using water courses rather than culverting them; including ponds and wetland areas within development proposals, and building in natural environment costs as an integral part of development proposals.

The following should also be considered:

- The creation of a National Habitat Network Map
- Public ownership of critical sections of the National Habitat Network, so that it is not subject to agri-environment grant funding
- Introduction of Habitat Banking
- Local authorities to be required to draw up a Green Infrastructure (GI) Plan for its area showing existing and potential sites for GI
- GI Plan's to incorporate a natural habitat network
- Legal protection for Habitats of Principal Importance (BAP Priority Habitats)
- Local authorities to be required to survey and map all Habitats of Principal Importance in its area

A planning system which covers all land resources and hence all eco-system services issues

Q7. How best can we harness and build on public enthusiasm for the natural environment so people can help improve it through local action, as informed consumers or by shaping policy?

Public support for the natural environment is high in the UK and is a resource that must be made use of wherever possible. However, such public support needs directing and guiding efficiently and effectively, a task that must be based on the policy framework set by central and local government. The RSPB and its natural environment colleagues have offered 6 key principles that should be

considered within the preparation of the white paper:

- Reconnecting more people with the natural environment
- Securing existing natural environment assets
- Focussing available resources on enhancement and restoration
- Involving local communities
- Developing large scale spatial visions for future landscapes and nature
- Aiming for long-term benefits

As the current system of designated and non-designated areas can prove complex and often difficult for the public to understand, another suggestion is having a National Habitat Network mapped at different levels with different levels of detail – national, sub-regional and local.

In addition, Planning Aid is a valuable resource for engaging and reaching local communities and should be utilised. Environmental education is an important part of the work of Planning Aid, helping adults and children understand particular issues, such as climate change and sustainability, or the key planning issues facing their local area.

Q8. What should be our vision for the role of civic society in managing and enhancing the natural environment and for engaging individuals, businesses and communities, in setting the agenda for that work?

Civil Society should be encouraged to work effectively with both government and professionals. As an example, the Lancaster & District Conservation Volunteers group, which is part of the British Trust for Conservation Volunteers Community Network, has carried out practical conservation work for over 25 years to improve the natural environment of Lancaster District. The group is volunteer led and works in conjunction with the local authority and other local bodies including schools, the National Trust and a local farmer. This partnership approach has proved to be effective and illustrates the most helpful role for volunteers in looking after the natural environment.

Q9. How best can Government incentivise innovative and effective action on the natural environment, across England, at the local level?

- a. How best can Local Government and other local partners work together to improve local outcomes on the natural environment, and pursue a more integrated approach linking a healthy natural environment to economic prosperity, sustainable development and better quality of life, health and wellbeing?**
- b. What are the most effective mechanisms for managing the natural environment where cross-boundary issues are involved, and making the link to other mechanism for economic growth, transport and planning?**

If it is to fully reflect its position at the heart of government policy, then the natural environment must be given added weight within a framework for sustainable development. An illustration of how voluntary effort alone is less than likely to succeed is there to see in the case of farmers and the voluntary Campaign for the Farmed Environment. Accepted instead of compulsory set aside by the last government, in the face of pressures from the farming industry, less than a third of those aware of it have done anything about it. If the industry itself cannot deliver, what hope of success

does a wider voluntary approach have? The government must strongly direct and guide, the need to revise PPS9 after the white paper, will provide a useful opportunity for such direction.

c. How best can the value of the natural environment be considered within local planning?

Although the impact on the natural environment is presently a material consideration in planning decisions, the natural environment is frequently given less weight than other material considerations, such as housing and jobs. New development should be required to demonstrate that it has produced a net gain for the natural environment, preferably on-site but off-site where this is not reasonably possible.

Q10. How best could the economy reflect the true value of nature's services in the way business is done, to drive smarter, greener growth?

Q11. Responsible businesses are already looking for ways to reduce their impact on the environment. How can we encourage more action like this?

Greening businesses would be a helpful focus in bringing the economy out of recession and helping the country to live within its environmental means. The recognition of the benefits and values of the natural environment has been recognised by the government in the consultation document – which we believe is a key and positive step in itself. The government clearly sees financial security requiring the natural environment but maybe are unsure how best it might put a monetary value on it. This is suggestive of a traditional cost-benefit analysis. The educational process and financial incentives still have a role to play in encouraging business to pay more than lip service to the natural environment, but regulation and enforcement must provide the complementary 'stick'.

Q12. What are the barriers to joining up and seeking multiple benefits from our natural assets?

Q.13. What are the barriers to thinking big and taking a landscape scale approach to managing our natural assets?

As far as barriers are concerned, the financial one arising from the Lawton Review (September 2010) will be significant. The review is recommending the creation of 12 huge 'ecological restoration zones' to improve key habitats and foster better connections between them. The total cost for rebuilding the natural environment in England will be between £600 million and £1.1 billion. Can innovative ways be found of meeting these costs through a pooling of public, private and voluntary resources over a number of years?

This big thinking and coordination, including the possibility of adding habitat restoration within the landscape character areas framework, will require a regional approach. Surely the dismantling of regional apparatus by government is not the best way forward when it will clearly be required for coordination and implementation?

Another important barrier is the will to want change, something identified 20 years ago in the first environment white paper 'This Common Inheritance'. Para.2.13 of that white paper stated 'The

environment will only improve if we ourselves have the will to do what lies in our own hands. We should encourage wider participation in the many responsible voluntary bodies which tackle environmental issues at national and local level. There is more public participation in Britain on environmental issues than ever before and it is crucial to make the most of the expertise and experience of Britain's voluntary bodies in the environmental field. It is people as well as governments that are essential participants in a successful environmental policy'. Will the new white paper build upon this and how will it relate to the UK Sustainable Development Strategy?

There will be a need to reassess the effectiveness of the voluntary approach currently adopted by farmers in the Campaign for a Farmed Environment, since this does not seem to be particularly strong in encouraging more farmers to look after the natural environment.

Q.14. What should be the priorities for UK's role in EU and international action, to protect and enhance the national environment at home and abroad?

It would be helpful if the UK could demonstrate its skills and expertise in protecting and enhancing the natural environment, within the context of the EU. This is an opportunity to move beyond the UK boundaries and to recognise the interlinked relationships between the natural environment in both the EU and the wider world.

Q.15. If you could choose just one priority action for the Natural Environment White Paper to drive forward locally, nationally or internationally – what would it be?

One priority would be that of effective culture change, in which the natural environment becomes better understood and accepted by key decision makers in both government and business, through educational content, culture change, and becoming a key part of effective citizenship. An evolutionary approach, rather than a revolutionary one, must be the way forward, building on the successes of the existing system for protecting and enhancing the natural environment.