



# RTPI

mediation of space · making of place

Royal Town Planning Institute  
41 Botolph Lane  
London EC3R 8DL  
Tel +44(0)20 7929 9494  
Fax +44(0)20 7929 9490

Email [online@rtpi.org.uk](mailto:online@rtpi.org.uk)  
Website: [www.rtpi.org.uk](http://www.rtpi.org.uk)

Patron HRH The Prince of Wales KG KT PC  
GCB

Via email: [rdpconsultation@defra.gsi.gov.uk](mailto:rdpconsultation@defra.gsi.gov.uk)

Mr Dave Boulton  
DEFRA – Rural Funding Review Unit  
Area 4E Ergon House  
Horseferry Road  
London SW1P 2AL

22 May 2006

Dear Mr Boulton

The Royal Town Planning Institute (RTPI) is a membership organisation representing over 19,000 town planners. The RTPI exists to advance the science and art of town planning for the benefit of the public.

In respect of the RDP for England and the Uplands Reward Consultations, the RTPI has undertaken internal consultations via its regions and membership structures. A detailed and integrated response was formed by the RTPI North West Region and this has been used as the basis for the following comments.

## **RTPI RESPONSE TO THE RURAL DEVELOPMENT PROGRAMME FOR ENGLAND CONSULTATION**

### **General Response (Questions 1 to 4)**

1. The RTPI is broadly supportive of the 4 core principles (Question 1, paragraph 14) and of the criteria to establish objectives for the new Programme (paragraph 14ii). The overarching term 'sustainability' should include a clear reference in the text to the use of an integrated approach, whereby preferred actions will demonstrate on balance environmental enhancement, a reversal of existing trends towards environmental harm and degradation, or at minimum an absence of net environmental harm that includes a commitment to avoid further loss or damage to critical environmental values.
2. In respect of both the concept of integration and in response to Question 2, the RTPI considers that the principles included here and actions undertaken in support of them should complement those found elsewhere in rural policy, for example in former ODPM's Planning Policy Statement 7 'Sustainable Development in Rural Areas'. References should be made to social inclusion, effective protection and

enhancement of the environment; prudent use of natural resources and a high and stable level of economic growth and employment.

3. It is particularly helpful to see principle (iv) include flexibility to respond to regional and local need and character and to regional and local priorities, in what amounts to a tailored approach.
4. The RTPI notes that the 3 Axes (paragraph 19) are drawn from EU-set objectives. Nevertheless, a question can be raised as to whether the three Axes work together in an integrated way or is the potential conflict between Axis 1 and 2/3 likely to be a stumbling block? There is considerable difference between the terms 'competitive' and 'sustainable' used in paragraph 19. In case of conflict, which Axis will prevail – perhaps Axis 2? In this regard, the RTPI notes and supports the budgetary primacy of Axis 2 (paragraph 25) and the introduction of sustainability into Theme 2 (paragraph 34) and calls for clarification of the implied status of Axis 2 as the primary or priority Axis.
5. In response to Question 4, the RTPI agrees that the nature of Rural Development Programme spending is likely to complement other policies and funding streams.
6. The spending priority on environmental stewardship is supported, but are the benefits to be paid out for environmental work at a significant enough level to attract applicants? Experience of the Countryside Stewardship scheme suggests that the level of funding just about covered the costs of using in-house and /or volunteer labour, rather than contractors (paragraph 27). We seek greater clarification of the level of matching funds from the Exchequer (paragraph 26).
7. The policy context (paragraph 29) must become more inter-ministerial, since there is no mention, for example, of important rural planning policy that resides within Planning Policy Statement 7 (PPS7), produced by former ODPM. PPS1 and PPS9 could also be mentioned here. In return, planning policy needs to refer to the RDP. Issues of integration with regional and local planning policy are also raised further below and in respect of Leader (points 22-26).
8. It is not enough for the programme design to encourage integration. It also needs to clearly illustrate it (paragraph 33). Further to this theme, in respect of regional integration, the planning system has recently been changed to require the production of statutory regional plans: Regional Spatial Strategies (RSS). These important documents will sit alongside Rural Delivery Frameworks and Regional Economic Strategies. The programme needs to be aware of, respond to and develop relevant RSS policy.
9. The RTPI broadly supports the three themes in paragraph 34, but is aware of possible conflict between the three Axes and of the need to have a priority axis in case this happens (see point 4 in this response above).
10. In respect of paragraph 36, the uplands are very much a priority area and additional comments are made at the end of this document. Biomass can make a significant contribution towards renewable energy, particularly where the market in growing crops for food has been depressed, and where the level of opposition in comparison to wind farms could well be much less (paragraph 36). Encouragement should also be expressly provided for agricultural waste to energy schemes, as part of more effective and sustainable rural waste management approaches.

### **Theme 1: Enhancing the Environment and Countryside (Questions 5 to 8)**

11. There is strong RTPI support for this theme (paragraphs 38/39). The challenges are important (paragraph 40) and hence the worthy priorities (paragraph 41) need to be reinforced by seeking the support of planning policy wherever possible. For example, where planning permission is required for development, planning and planning policy provide tools to assist maintaining and enhancing landscape quality and character, protecting the historic (archaeological and built) environment, promoting public access to and understanding of the countryside and enhancing water and run-off quality. That being said, whilst the theme of protecting the historic environment is generally lauded, member comment has identified the concern that this should not be raised as a barrier to enhancement by way of innovative and positive new technological, built and rural practice development.

12. The RTPI lends particular support to the economic opportunities that can come from the environment and countryside theme, notably employment generation for land management and craft skills (paragraph 42).
13. The key challenges are important (paragraph 43) but any solutions must be integrative and involve planning policies as a vitally important tool. For example, planning can help implement the Joint Character Areas approach.

#### **Missing Theme: Renewable Energy & Biomass?**

14. The RTPI is not clear where the worthy sustainable energy and biomass directions expressed at page 18 of the consultation document will find a home in the programme. Either an existing theme needs to be broadened to provide this with a natural home and expressed priorities, or it needs to be accorded the status of a theme and prioritised in the same manner as the currently proposed themes. If these steps are not taken, there is a danger that these directions will remain un-responded to in implementation.

#### **Theme 2: Making Agriculture and Forestry More Competitive and Sustainable (Questions 9 – 12)**

15. More competitive farming will need clear limits and parameters that do not lead to long term and irreversible damage to the environment and countryside if it is not to continue to be unsustainable (paragraph 44). Fostering 'a more market driven and competitive business environment' (paragraph 47) must not be to the detriment of the environment. The emphasis on sustainability will need to acquire weight and practical force in implementation.
16. The material on skills and knowledge transfer is very useful, particularly the emphasis for farmers and land managers to gain better access training in resource identification, management and conservation (paragraph 47). This could be difficult for some and will need to be matched by a reduction or redistribution in the 'paperwork overload' that is afflicting many farms.
17. The RTPI supports the complementary nature of the programme and the priority towards the challenges facing upland farmers (paragraph 48).
18. It is important to find both the time and financial incentives for farmers to expend an increasing proportion of their effort on land and natural resource management.

#### **Theme 3: Enhancing Opportunity in Rural Areas (Questions 13 – 16)**

19. It is useful to see reference to 'the geography of rural disadvantage' (paragraph 51) and to the need to focus priorities on trying to tackle this, with knock-on effects on both local housing and services provision (paragraph 52). Paragraph 50 could also quote RDC/Countryside Agency past work showing 20% of rural households in/on the margins of poverty.
20. Concentrating priorities on economically lagging areas and the upland communities is important (paragraph 53).
21. In terms of the key challenges, there are important links between developing and maintaining environmental quality for the countryside and rural communities, and the need to obtain economic capital out of it (paragraph 56). This is a balance that the planning system is well oriented to consider and deliver.

#### **Leader**

22. Some members have expressed concern that the likely future scale of Leader is too small, given EU & national government priorities towards community-driven activity and consider that Leader will not 'ensure programme integration' with the proposed budget allocation.

23. Are the RDAs the best bodies to lead the scheme, given their hitherto urban emphasis and need to build their rural credentials? The RTPi is in part concerned about the emergence of a multiplicity of local strategic frameworks and projects with possibly insufficient synergy or alignment. Elsewhere, it has strongly advocated the need to 'join up' local strategic planning under the Town and Country Planning Act (Local Development Frameworks' (LDF) Core Strategies) with Sustainable Community Strategies (SCS) and Local Strategic Partnerships (LSPs) prepared between local government and key service providers. New 'local development strategies' are advocated as a component of Leader. It appears that there ought to be opportunities to align these and share delivery with LDF Core Strategies, with SCSs through LSPs, aiming to simplify strategy making systems and to avoid community engagement fatigue and programme conflict. Similarly, are there not opportunities to link to the sub-regional dimensions of the Regional Spatial Strategies and the work of Regional Assemblies? Where does the Commission for Rural Communities fit in? Integration is hinted at towards the end of the chapter, but should be explored further (see paragraph 62).
24. In respect of paragraph 58 and in keeping with Leader's community based and 'bottom-up' history, RDAs administering Leader should be encouraged to delegate delivery monies to those closer to the communities that are supposed to be the basis of the Leader approach.
25. There should be a much stronger and sharper link between Leader and tools such as village design statements and parish plans, which provide opportunities for local communities to identify their needs and devise appropriate, sustainable solutions (paragraph 57).
26. Beyond this, the continuation of Leader can be supported.

#### **RTPi RESPONSE TO THE RURAL UPLANDS REWARD STRUCTURE CONSULTATION**

1. This consultation document complements the RDP document.
2. There has been much debate about the role of traditional hill farmers, their contribution to the rural economy and the role they play in maintaining the landscape and biodiversity of the English uplands (paragraphs 1 and 2).
3. A good point is made about land management and conservation skills not being looked at in isolation from wider social and economic issues affecting hill farming and upland communities (paragraph 1.12).
4. The document clearly defines the Less Favoured Areas (LFA); the Severely Disadvantaged Areas (SDA) and the Disadvantaged Areas (DA) (paragraphs 2.3/2.4). It also clarifies the shift away from policies designed to sustain food production (paragraph 2.4) towards encouraging the provision of landscape and environmental benefits (paragraph 2.12).
5. That being said, the RTPi considers that it is in the interests of long term sustainability and adaptability to climate change to retain the potential for food production on some of the land where this may cease in the short to medium term. Clearly it will be desirable to maximise landscape and environmental benefits on land where remnant values are highest, with the argument being advanced that flexibility should best be retained on land where remnant values are limited.
6. The RTPi broadly supports the preferred options for focussing expenditure on environmental schemes (paragraph 2.14).
7. It is interesting to note the Government attitude to the possibility of land abandonment, which does not see it as necessarily a bad thing, provided that it can be planned for and actively managed (paragraph 2.17). Livestock will continue to be the primary production focus and outwardly the upland scene may well look very

much the same. However, the livestock will be as much tools for environmental and landscape management, as they will be a source for maximising food market returns (paragraph 2.20).

8. Options 1 and 2 are the most attractive on offer. Option 1 is clearly aimed at getting upland farmers into Environmental Stewardship Schemes. This will involve a change in emphasis towards 'farming the environment' and may lead to some farmers getting out of upland farming. Option 2 may be the best longer term route, with its own Uplands Environmental Stewardship Scheme.

This response raises no issues of a confidential nature and may be referred to and cited in public.

I trust that the above is clear. Should you have any questions that you wish to explore, please contact me on 020 7929 9478 or by email to [rynd.smith@rtpi.org.uk](mailto:rynd.smith@rtpi.org.uk).

Yours sincerely,



Rynd Smith  
**Head of Policy & Practice**

Tel: +44 (0) 20 7929 9478  
E-mail: [rynd.smith@rtpi.org.uk](mailto:rynd.smith@rtpi.org.uk)