



**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)  
Registered Charity Number:  
(England) 262865, Scotland (SC 037841)  
Patron HRH The Prince of Wales KG KT PC GCB

Date: 19 June 2008

Soils Policy Team,  
Defra,  
3C Nobel House,  
London,  
SW1P 3JR

By email to: [soilstrategy.consultation@defra.gsi.gov.uk](mailto:soilstrategy.consultation@defra.gsi.gov.uk)

Dear Sir/Madam,

**CONSULTATION RESPONSE: Consultation on the draft Soil Strategy for England**

Please find attached a response by the Royal Town Planning Institute (RTPI) to the above consultation. The RTPI is a membership organisation representing over 21,000 spatial planners. It exists to advance the science and art of town planning for the benefit of the public.

This response was drafted by the RTPI Rural Planning Network following an internal consultation. The responses to the questions set out in the consultation paper are attached below. Thanks are due to David Alexander MRTPI for his substantial contribution in reviewing the document.

Key issues and observations for further consideration in our view are as follows:

Adaptation to climate change processes suggests that the UK needs to retain a flexible capacity to both change and increase food production from our soils, in response to changes in the outputs from currently productive regions elsewhere in the world. At a time of growing demand for agricultural products and with food security issues currently in the limelight, the importance of soils and our dependency on them is also receiving greater emphasis and requires greater understanding and factoring into policy and decision making.

It is within the built environment where the planning system can have a greater impact on soil functions, particularly through Planning Policy Statements (including the Climate Change Supplement to PPS 1); Sustainability Appraisals and Environmental Impact Assessments, which recognise the value of agricultural soils; Sustainable Urban Drainage Schemes and land management practices that help to secure soils as carbon sinks.

Chapter 1

Soil is a finite natural resource and a key part of natural capital, without which life on earth would be impossible. There remains a great deal to be done to improve soil management in order to deliver a wide range of benefits to society. A Strategy such as this can set the future policy direction which in time can permeate through all relevant policy strands, including planning.

Chapter 2

'To alleviate some of the world-wide shortages of cereal supply, the EU Agricultural Council has set a 0% rate for set-aside in 2008'. The main result of this change is likely to be more rotational set-aside being cropped for the 2008 harvest. If land in long-term

set-aside is also cultivated, it could have adverse environmental impacts, including increased losses of soil carbon, on habitats and biodiversity. There are also pressures to bring areas of non-arable land into production, such as the ploughing up of grassland for bio fuels and the use of more marginal land for cereal production, both of which will have a similar, if not greater impact on soil carbon (not to mention other habitat/biodiversity and landscape concerns).

Further, the landscape effects of agricultural change must also be considered. Whilst we may not be able to eat the view, it does bring in considerable business income from visitors<sup>1</sup>. It must also be remembered that rural landscapes form a strong component of our sense of place and that decision making will need to take landscape values and impact and community views about landscape values and impact, into account.

#### Chapter 4

The stated objectives set out at 4.8 are supported, but the current effectiveness of cross-compliance at the level of individual farms is questioned and needs to be a priority area for future work. In relation to the points at 4.9, how is guidance being delivered and what enforcement measures are seen as most effective?

Concern is raised regarding the removal of the Soil Management Plan Option from Environmental Stewardship noted at 4.11. This impacts on the importance given to soils in this consultation paper. It is considered that soils should be a mandatory requirement rather than an option.

The review of Environmental Stewardship noted at 4.12 ought to be invaluable, but will it be carried out by an independent body?

Learning lessons from countries that already encounter our predicted future climate is strongly supported (4.14).

#### Chapter 5

Soils need to be included as headline indicators on the better use of natural resources (5.15).

The Biomass Strategy is linked to the Energy White Paper and should be subject to urgent review in the light of the possibility of the UK raising its 5% target to match the EU target of 10%. Fuels sourced from biomass may help to tackle climate change on the one hand, but they are doing little to improve food security and demand by taking land out of food production. In addition there are environmental implications not only for food, but for biodiversity, landscape and soil carbon.

#### Chapter 6

**This is considered to be a key chapter for planners, since they are likely to have most influence in this area.**

Between 2001 and 2003 some 5,860 hectares per year of land became developed. Best and Most Versatile land (BMV) is a long established planning tool covering grades 1 to 3a. Weight must be given to protecting good quality soils and it may well be a good time to reconsider the weight and importance of BMV. The construction sector has the largest impact on soil within the built environment. Soils are often poorly considered and significant opportunities for improvement exist if earlier consideration was given to soils.

The objectives set out at 6.16 are supported.

Support should be given to encouraging greater inter-departmental cooperation between Defra and DCLG, and to increased help for planners on 'what soil information is required to take decisions at the local level and the best mechanism for making this available'.

---

<sup>1</sup> See article by Paul Evans in Society Guardian Environment on 7<sup>th</sup> May: A World Apart.

It is important to make sure that the revised British Standard for Topsoil (November 2007) is working and that the best practice guidance on soil use on construction sites (a draft code of practice is expected shortly) is enforced.

Sustainable Urban Drainage Schemes (SUDS), which mimic as closely as possible natural drainage, should be promoted more strongly within the planning system, especially in PPS1 and PPS 25, built also within PPS3 and PPS23.

#### Chapter 7

The objectives set out at 7.6 are supported.

In relation to the points raised at 7.8, do we know which soils or land uses are suitable for the recycling of organic materials?

#### Chapter 8

Evidence is a vital priority to underpin the Soil Strategy. Perhaps some research appropriate to the planning dimension and the current effectiveness of the planning system for soils, can be encouraged through UK planning schools?

In summary, the draft Soil Strategy requires strong support and provides a real opportunity for planners to get involved in policy formulation, especially within the built environment.

I trust that this response assists Defra towards its final version of the Soil Strategy for England. If you require any further assistance, please contact Mr Rynd Smith, Director of Policy and Communications on 020 7929 9472 or email [rynd.smith@rtpi.org.uk](mailto:rynd.smith@rtpi.org.uk)

Yours sincerely,



**Rynd Smith**  
**Director of Policy and Communications**

Tel: 020 7929 9472

## RESPONSE TO CONSULTATION QUESTIONS

**Question 1.1: Do you agree that a strategic document is required to set out domestic soils policy?**

Yes; a strategic document is needed to set out domestic soils policy.

**Question 1.2: Do you agree with our decision to have a Soil Strategy rather than a second Action plan?**

Yes. A Strategy must be seen to effectively permeate other relevant policy areas, including planning. It can be implemented through a series of national, regional and local actions plans.

**Question 2.1: Do you agree with our analysis of the evidence of pressures on soils?**

Yes, the pressures on soils are agreed and the precautionary principle is an important one to apply in the Soil Strategy.

**Question 2.2: Do you have any other evidence/valuations that we should consider?**

It is important to back up the Strategy with direct evidence from completed and on-going soil research, for which available long term funding must be maintained as a priority.

**Question 3.1: Views are invited on our vision.**

The proposed **vision** is supported as set out ( 3.1), stressing the need to optimise the varied functions of soil and to try and ensure that soils **everywhere should have as a wide a variety of functions as possible**( and not just in designated areas or areas of poorer soil quality).

**Question 3.2: Views are invited on our objectives. Do you agree with our proposed objectives? Is it important that we set these objectives? Have we missed anything significant?**

The 4 objectives are supported (3.2), with emphasis on agriculture and soils in rural areas, and on the construction industry and planning within the built environment. The stated **priorities** are supported (3.5) and it might be helpful to develop a series of national, regional and local action plans that will focus on their implementation.

**Questions 3.3: Views are invited on the priority and supporting work areas. Do you agree that these are the priority areas for future work on soils? Have we missed anything significant or included areas which are not important?**

**Questions 3.4: What are your views on the topics which have not been identified as a priority for Defra action?**

Work areas **in support** of the priority work are also supported (3.7), but 'landscapes' should be added to the area of soils and cultural heritage. Care needs to be taken not to exclude these non-priority areas from any research and complementary work on them may be carried out by other relevant bodies with an interest and expertise. An annual review would be a helpful way of seeing whether any changes are needed to the priority/non-priority areas. Two further points are important here:

- a) What are the key indicators (3.12) and why are they not clearly listed here?
- b) It is important to complement and integrate the work areas with the range of existing development policies (3.14) A structured table setting out the links with these other policies, including planning policies, would be helpful.

**Question 4.1: Views are invited on our objectives for this work area. Do you agree with the proposed objectives and how we plan to achieve them? Have we missed anything significant?**

There is broad agreement here, but the delivery and enforcement mechanisms need to be clearer. How effective is cross-compliance at farm level and is a practice review needed? What is the Environmental Stewardship review date and why have Soil Management Plan options been removed from it?

**Question 4.2: Views are invited on what success would mean for this work area and the priority that should be put on each of our indicators of success.**

There is broad agreement with this, but pilot studies would help to identify early good practice.

**Question 4.3: Views are invited on our identified key next steps for this work area. Do you agree that these are the correct first steps? Have we missed anything significant?**

These are supported, with both cross-compliance and Environmental Stewardship reviews seen as important. Are they successfully achieving their ends, especially when food prices are rising; set aside is 0% and there must be a potential danger of farmers /land managers compromising on environmental measures by following the economics of commodity prices? **Concern is expressed here.**

**Question 4.4: View are invited on the potential social, economic and environmental costs and benefits of this work area as a whole and on the next steps proposed.**

The issue of soils and a Soil Strategy are important dimensions in the wider land use debate currently under consideration in several quarters. Box 7 provides a helpful summary of the position.

**Question 5.1: Views are invited on our objectives for this work area. Do you agree with the proposed objectives and how we plan to achieve them? Have we missed anything significant?**

The objectives for this work area are supported.

**Question 5.2: Views are invited on what success would mean for this work area and the priority that should be put on each of our indicators for success.**

It would be useful to list the table of indicators for clarification and to consolidate our thinking and understanding.

**Question 5.3: Views are invited on our identified key next steps for this work area. Do you agree that these are the correct first steps? Have we missed anything significant?**

Successful and effective monitoring will be an important key to achieving success.

**Question 5.4: Views are invited on the potential social, economic and environmental costs and benefits of this work area as a whole and on the next steps proposed.**

It is important to see clearer links before rushing headlong into bio fuels policy, which seems to be exacerbating food availability and security at a global level.

**Question: 6.1: Views are invited on our objectives for this work area. Do you agree with the proposed objectives and how we plan to achieve them? Have we missed anything significant?**

The objectives for this work area are supported (6.31)

**Question 6.2: Views are invited on what success would mean for this work area and the priority that should be put on each of our indicators of success.**

Much will depend on the effectiveness of implementation, delivery and enforcement.

**Question 6.3: Views are invited on our identified key next steps for this work area. Do you agree that these are the correct first steps? Have we missed anything significant?**

Support is given.

**Question 6.4: Views are invited on the potential social, economic and environmental costs and benefits of this work areas as a whole and on the next steps proposed.**

Monitoring of the impact of soil in the decision making process is an important step forward. Box 10 provides a helpful summary.

**Question 7.1: Views are invited on our objectives for this work area. Do you agree with the proposed objectives and how we plan to achieve them? Have we missed anything significant?**

The objectives are supported.

**Question 7.2: Views are invited on what success would mean for this work area and the priority that should be put on each of our indicators of success.**

The work priorities are supported.

**Question 7.3: Views are invited on our identified key next steps for this work area. Do you agree that these are the correct first steps? Have we missed anything significant?**

The next steps are supported.

**Question 7.4: Views are invited on the potential social, economic and environmental costs and benefits of this work area as a whole and on the next steps proposed.**

Box 11 provides a helpful summary.

**Question 8.1: Views are invited on our plans for this work area. Do you agree with our plans and how we plan to achieve them? Have we missed anything significant?**

The work plans are supported.

**Question 8.2: Views are invited on what success would mean for this work area and the priority that should be put on each of our indicators of success.**

Guaranteed funding and effective monitoring are essential if significant progress is to be made.

**Question 8.3: Views are invited on our identified key next steps for this work area. Do you agree that these are the correct first steps? Have we missed anything significant?**

The next steps are supported with the addition of adding further planning research to them.

**Question 9.1: Views are invited on our plans for this work area. Do you agree with our plans and how we plan to achieve them? Have we missed anything significant?**

This is supported.

**Question 9.2: Views are invited on what success would mean for this work area and the priority that should be put on each of our indicators of success.**

Supported.

**Question 9.3: Views are invited on our identified key next steps for this work area. Do you agree that these are the correct first steps? Have we missed anything significant?**

Planning research needs to be added to the next steps, especially within the built environment.

**Question 10.1: Views are invited on our plans for reporting progress and holding an annual stakeholder meeting. Do you agree with our planned approach? Would you be interested in being involved in these meetings?**

This is supported, with the addition of the Royal Town Planning Institute as a stakeholder and as a member of future Soil Forums (Annex D, 78) The RTPI can have a beneficial influence on disseminating policy to planning practice.