



**RTPI**

mediation of space · making of place

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Email response sent to: [andy.wharton@naturalengland.org.uk](mailto:andy.wharton@naturalengland.org.uk)

Dear Andy,

**RESPONSE TO CONSULTATION PAPER: Natural England's Draft Policy for All Landscapes Matter**

Thank you for the opportunity to respond to the above consultation. The RTPI is a membership organisation representing over 22,000 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. Thanks are due to members of this group for their substantial contribution in reviewing the document.

The RTPI supports a multi functional and integrated approach to landscape management. Consideration needs to be given to how the various sectors of government and society integrate effectively on this issue and we are interested in exploring the role of planning in helping this integration with Natural England and other parties.

Please find the RTPI's responses to the formal consultation questions pertinent to planning enclosed below.

If you require any further assistance, please contact Rebecca Coates, Planning Policy Officer on 0207 929 9494 or email [england.policy@rtpi.org.uk](mailto:england.policy@rtpi.org.uk).

Yours sincerely,

Rynd Smith  
Director Policy and Partnerships

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## General Comments

The RTPI recognises the approach taken in this consultation paper to support the policy direction of landscapes into the future. We also recognise the importance of the planning system in shaping and implementing policy and that the policies outlined in this paper should not attempt to restate planning policy statements (PPS) or policies outlined in regional spatial strategies (RSS) or their successor regional strategies. Realistically, statutory bodies will use a PPS or RSS as the main source of policy guidance when tasked with decision making and care will be required to ensure that the relevant policy considerations do not become unduly complicated by what may be seen as an additional tier of policy. Clarity about the function of the policy will be important, ensuring that readers are aware that it guides a host of Natural England activities and engagements and should not be construed as an alternative source of planning policy.

Responses to the draft policies are set out below:

### Policy 1: Landscape management, protection and planning

**All landscapes matter. They should be managed, planned and, where appropriate, protected through a landscape character approach to be distinctive and highly valued while delivering a full range of ecosystem goods and services.**

The RTPI support the notion that all landscapes matter, however care is required when defining whether or not a landscape ‘...should be managed, planned, and where appropriate, protected...’. It is important that the community is engaged when making decisions regarding the management or potential protection of landscapes and that their values are incorporated to enable responsive judgements to be made about the value or significance of landscapes. Communities’ sense of the meaning of landscapes change significantly over time and landscapes change in response to wider social, economic and environmental changes. It is valuable to see policy developing in a manner that reflects the importance of values and the fact that landscapes are a product of change and hence inherently dynamic and mutable.

That being said, the writers of policy should be aware that when decision making, a loose word within a policy can be framed as a rationale for action or for decisions not supported by existing planning policy and thus leaving it open to legal challenge. For example, the use of ‘where appropriate’ could be used to suggest that the protection of some designated landscapes is no longer important (or as important) or it may provide a basis for local campaigns to argue for attention and funding for landscapes that historically have not been protected. This in turn might prolong or complicate decisions affecting undesignated landscapes (e.g. wind farm proposals).

The RTPI believes it is important to ensure that the holistic definition of ‘landscape’ in the Natural Environment and Rural Communities Act 2006( to include aesthetic, cultural, geographical and historic aspects as well as habitats), is understood and appreciated by planners and other stakeholders and meaningfully incorporated within planning policy. CPD and other training events might be useful here and the RPN would wish to help where it can.

Page 1 of the consultation document supports a transition in policy needs...“from one focussing on ‘outstanding’ areas to one focussing ‘on the quality of all living surroundings’”. This is not a new concept in the UK, notably since the development of landscape character areas, but where does it leave the “outstanding” designated areas such as National Parks and AONBs? Unlike nature conservation planning, where a strongly hierarchical approach to planning policy interpretation remains in force, this is much less favoured in terms of landscape. It is important to address and clarify this issue in the revised policy for the benefit of planners.

With regards to the wording of Policy 1 the following comments are provided:

1. The use of the term ‘where appropriate’ could leave room for uncertainty, legal challenge and debate.
2. The text following Policy 1 states ... *“We want all landscapes whether protected, rural, coastal or urban, ordinary or outstanding, to be managed, planned, and where appropriate, protected for their landscape character.”* The first reference meaning “protected” (i.e. existing landscapes) and the second referring to all landscapes worthy of protection. The use of this word for two different meanings could be confusing for readers and decision makers.

### Policy 2: Dynamic and evolving landscapes

**Landscapes are dynamic and constantly evolving. We need to plan and manage this change to ensure that all landscapes in the future respond to society’s changing needs and values.**

The RTPI supports this policy.

It is important to identify and establish what current forces are driving landscape change. This should include an in-depth analysis of up to date data regarding the implications that climate change will have on landscapes. Taking this long term approach should future-proof the management, planning and protection of landscapes. In addition, any implications of the current recession, which may be having both beneficial and damaging impacts on landscape, should be considered, however noting the likely short-term unpredictable effect of changing economic circumstances.

Landscape change has occurred as a result of many individual landowners and managers 'planning' their individual responses to prevailing economic and social circumstances. Collectively, this has given rise to many individual 'plans' and produced the landscapes that have shaped England over many years. For example, this can be seen in a detailed look at individual farms in the North West. Recent years have witnessed a greater arable acreage than before (maize, barley, wheat, much of it for stock feed) in areas dominated by pastoral farming. Herd size has increased and some farmers are keener to keep stock inside for longer, with a correspondingly different attitude and approach being taken to their fields and land management. In some cases, field size is being increased. All this will lead to a changing pastoral landscape in the area, with significant impacts on biodiversity, wildlife habitats and the visual appearance of the landscape. Of particular concern for landscape are internal field boundaries, which are being given a lower priority by some land managers, especially at present because of cost implications

It is only right that all landscapes should increasingly deliver environmental and social outcomes, and yet a large number of landowners and managers remain primarily farmers, committed to making a living through food production. There are current conflicts over levels of self-sufficiency and arguments over food versus environmental goods.

It is noted that Defra are currently inviting proposals for "Estimating the Socio-Economic Impacts of Environmental Stewardship. Another important piece of research would be to focus on the environmental effectiveness of both Cross Compliance and the entry level of Environmental Stewardship. Could these initiatives be used to enhance landscapes across England?

### **Policy 3: Landscape as an Integrating framework**

**A comprehensive understanding of landscape should influence, as well as provide an integrating framework for, the management of change at a range of spatial scales and governance levels.**

This policy is supported in principle; however it would be useful to research how effective planning policy has been in guiding and fostering landscape change. Is it more effective in terms of the designated landscapes, which have tighter sets of polices, with less influence over landscapes within the other national landscape character areas.

The 'place based' approach (mentioned in the supporting evidence) should be fully compatible with that of professional planners and should arguably find a strong ally in the planning system's Regional Spatial Strategies (RSS) and Local Development Frameworks (LDF). However it is noted that "*landscapes provide their own boundaries and contexts, defined by their landscape character and/or landscape function*" (Page 4) this is similar to the river basin approach - crossing local authority boundaries, and often not coinciding with sub-regional planning areas selected on the basis of economic activity.

### **Policy 4: European Landscape Convention**

**The European Landscape Convention should be embedded more deeply into national, regional and local strategies, policies, processes and actions which affect England's landscapes and their enjoyment and understanding by the public.**

The supporting text states "*The all landscapes matter principle should become embedded within the full range of national, regional and local sectorial policies that have a direct and indirect influence on landscapes, and should influence spatial planning, land use and resource management*". The RTPI supports the stronger integration of the 'all landscapes matter' principle.

From a planning perspective Planning Policy Statement 7: Sustainable Development in Rural Areas is an important policy document in considering landscape matters and should be up-dated to incorporate reference to the European Landscape Convention (ELC) this in turn can then be incorporated into regional and local policy documents. However this is a challenge for statutory plans that cover large urban areas. It can be more readily accepted into National Park Plans and AONB Management Plans.

### **Policy 5: Valuing landscape**

**Why and how society values landscapes needs to be better captured, translated and fully represented in decision-making. The public should have greater involvement in the management, planning and protection of landscapes, so that as landscapes evolve they can continue to exhibit the characteristics and functions that society values, and reinforce connections between people, place and local identity.**

We support greater public involvement at a local level in assessing landscape/townscape character as well as involvement in setting objectives for management plans but there needs to be clear transparency in decision-making. Landscapes are valued for many different reasons by many different people, all valid in themselves, but some are likely to give rise to more potential conflict than others, especially at the level of local landscapes.

Public involvement through community participation and engagement resonates well with the approach adopted by the planning system. In this case the link with planning is particularly strong as it is concerned with 'sense of place' and 'local distinctiveness'.

The RTPI through Planning Aid provides advice to hard to reach groups and communities, helping them to navigate the planning system and related policy development. Planning Aid could provide a valuable means of ensuring well grounded community engagement to support landscape policy development.

### **Policy 6: Landscape, Design & Development**

**Good design is a key factor in the management, protection and planning of landscapes and benefits through landscape enhancement should be sought through the design of development and infrastructure.**

Planning policy shares this goal and therefore it is important to work closely on development and design. Green infrastructure strategies are an example of where close working could achieve real benefits. The North West Green Infrastructure Strategy could provide a useful case study.

Consideration also needs to be given to good design in farmed landscapes, given that so much vital land management is carried out by a myriad of farmers with varying degrees of interest and understanding. The RTPI supports the resurrection of the New Agricultural Landscapes Project and key role in guiding future directions. The existing 33 year role of monitoring landscape change provides invaluable evidence of sound directions in farmed landscapes.

The supporting text to the policy notes the connections through landscape led design for the conservation and enhancement of biodiversity and it is important to encourage and foster a stronger link between landscape and biodiversity through the planning process.

Closer working with CABI on the design of settlements, structures and spaces is also important within more urban landscapes.

### **Policy 7: European and International context**

**The management, planning and protection of England's landscapes should recognise their European and international context. Further opportunities should be taken to learn from and contribute to European and international measures, policies and initiatives.**

It is important to indicate just what this means in practice for those concerned with England's landscapes. Valuable European principles and guidelines should be considered in England, where appropriate and positive coordination should be advocated by Natural England. Thought should also be given to how this relates to ICOMOS and World Heritage Sites.

In considering this policy, Natural England should be aware of the potential conflicts posed with Policy 1 that implies a watering down of the existing landscape hierarchy through valuing all landscapes. It will be vitally important that when finalising landscape policies, that this issue be resolved. In the event that this would require a decision about future direction, the RTPI supports the direction set out in Policy 7.

### **Policy 8: Landscape Character Areas**

**England's National Character Areas should be refreshed and used to provide a geographical framework, sound evidence base and broad understanding of the variation of landscape character at a national scale. Landscape character assessment should be promoted and used to understand and describe landscapes at all scales.**

We support the presumptive use of the national landscape character framework by planners and the planning system as a good foundation for policy formulation. Some planning authorities seem more positive about using this framework than others and a common standard is important for all. New regional landscape character frameworks are shortly to be wheeled out by Natural England and that for the North West is expected in May. These will form an important part of the forthcoming Regional Strategy.

The base line value of this work must not be lost through it becoming out of date. The existing national character areas will need revisiting in light of climate change and species survival, as well as food, fuel, farming. There is also a need for more local assessment of character areas.

In terms of planning policy, Planning Policy Statement 7(PPS7) Sustainable Development in Rural Areas requires urgent updating and should be cross referenced with Planning Policy Statement 9 (PPS9) Biodiversity and Geological Conservation.

#### **Policy 9: Landscape monitoring**

**Monitoring and understanding how the condition and qualities of all our landscapes are changing is needed at a national, regional and local level. Such monitoring will help inform choices and policies about the direction of our landscapes in the future.**

This policy is supported. It is clearly important to help inform choices and policies through monitoring, and thus help to guide future landscape change. The public, civil society as well as stakeholder NGOs should be involved in local monitoring. However it is also critically important to address how the results and required action from monitoring are implemented, including within planning policy.

Good practice guidance must be researched and offered on landscape monitoring. Landowners and managers must be encouraged to act positively on the findings of monitoring reports and good practice evidence of this should be used to encourage others.

The New Agricultural Landscapes Project should be revisited and become an important spearhead in the future of landscape monitoring.

The balance sheet following assessments of landscape change between 1990-98 and 1999-2003, needs to be carefully assessed particularly in terms of neglect or erosion of landscape character. The planning system can play an important and valuable role in the league of players helping to bring about landscape change.