



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
Website: www.rtpi.org.uk

Registered Charity Numbers
England 262865
Scotland SC 037841

Patron HRH The Prince of Wales KG KT PC GCB

20 July 2009

Email response sent to: ecosystemsapproachpolicy@naturalengland.org.uk

Dear Sir/Madam,

RESPONSE TO CONSULTATION PAPER: Natural England: Draft Ecosystems Approach policy consultation

Thank you for the opportunity to respond to the above. 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 document responds to the Natural England consultation on the Draft Ecosystems Approach policy.

The response has been formed drawing on the expertise of members including the RTPI Environmental Planning and Protection Network.

If you require any further assistance, please contact Rebecca Coates, Planning Policy Officer on 020 7929 9466 or email england.policy@rtpi.org.uk

Yours faithfully,

Matt Thomson
Head of Policy and Practice

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Introduction

The response set out below constitutes a summary of key points the Royal Town Planning Institute wishes to raise with respect to this consultation.

Policy 1. Ecosystem services integral to decisions & evidence

Our decisions about the natural environment should seek to maintain the provision of ecosystem services wherever this is compatible with our responsibilities for the natural environment, and our respect for its intrinsic value.

Comments:

The RTPI fully supports Policy 1. The role of the ecosystem services framework as complementary to intrinsic value is a critical point to make.

While in some cases there are opportunities for “win-win” i.e. delivering biodiversity, and a mix of ecosystem services together, on other occasions there will be trade-offs. For example, intensive agriculture delivers provisioning services at the expense of biodiversity. Some acknowledgement of this and how NE intends to respond would be useful.

Policy 2. Better public understanding

The value of the natural environment is not adequately recognised by society and it is crucial that people understand the links between their own well-being and the valuable services provided by the natural environment.

Comments:

This statement is supported, but it is framed as a statement rather than a policy. It could be framed in terms of NE's responsibility to communicate the value of the natural environment to wider society.

Policy 3. Society engaged

Action is necessary from all sectors of society, including government, business, NGOs and local communities, to support the provision of ecosystem services.

Comments:

We believe acknowledgement that action is needed from all sectors is useful, but as with policy 2 it is not a policy in its own right. It could emphasise the need to engage business and all areas of Government, and focus on the institutional reforms needed to integrate ecosystem services values into decision-making, i.e. the need for political spine, regulation, and market mechanisms. This is a policy aim which is not adequately covered by the proposed policy 4.

Policy 4. Innovative support mechanisms

We require new mechanisms to deliver an ecosystems approach, including innovative financial and other instruments.

Comments:

The RTPI suggest that Policies 4 and 5 could be swapped so that the “how you pay for it” follows the need to directly

provide investment.

Policy 5. Investment in ecosystems

Investment in the natural environment informed by economic analysis, is necessary to deliver ecosystem services which are critical to the well-being of present and future generations.

Comments:

It is important to highlight that regulation and market mechanisms will not provide adequate investment on its own. In some cases, direct government financing will be required to deliver ecosystems services.

Part of this direct provision can come through government owned land. The paragraph on "significant areas of publicly owned land" could be moved to this section, particularly if Policy 3 is re-worked along the lines recommended above.

Annex 2: Millennium Ecosystem Assessment Classification of Ecosystem Services

Comments:

We do not believe that the document clearly differentiates between the Ecosystem Approach and the Ecosystem Service Approach. This is an important distinction and has implications for policy intervention.

Overview & Summary of Natural England's draft policy on Ecosystems Approach

Comments:

The policy approach is generally welcomed. However, the document does not clearly differentiate between the 'Ecosystem Approach' and the 'Ecosystem Service Approach'. This is an important distinction and has implications for policy intervention.

It also has implications for Natural England's role as statutory advisor in the town and country planning system. Natural England should articulate more clearly these implications, both for planning policy and for the advice it gives to local planning authorities.

There is also no discussion of the role of biodiversity in the delivery of ecosystem services and we feel that the document would benefit from the inclusion of this.