

**RTPI**

mediation of space · making of place

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25th September 2009

Email response sent to: sarah.manning@naturalengland.org.uk

Dear Sarah,

RESPONSE TO PROTECTED LANDSCAPES DRAFT POLICY FOR CONSULTATION

Thank you for the opportunity to respond to the above consultation. The Royal Town Planning Institute (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 members of the RTPI Rural Planning Network following an internal consultation.

Through the Rural Planning Network, the RTPI have already responded positively to the earlier consultations including 'All Landscapes Matter' and 'Future Landscapes'. We fully recognise that landscapes must evolve over time, taking account of new social, economic and environmental challenges such as climate change, water resource management, renewable energy demand, changes to the Common Agricultural Policy and calls for food security. With a relatively affluent and mobile society, protected landscapes must remain relevant to that society and should help to deliver a range of important ecosystem goods and services.

The RTPI support the importance of protected landscapes strengthening nature conservation; improving connectivity and linkages across the wider countryside; supporting the implementation of the European Landscape Convention, and embracing with climate change.

The RTPI emphasises the value of Natural England engaging with the planning system due to its close relationship with protected landscapes. Such engagement needs to be not only at national and regional levels, but also at the local level, in order to help the many planners whose everyday decisions incrementally influence the future of protected landscapes. Planners need both the support and practical assistance of Natural England if they are to plan more effectively within protected landscapes.

The RTPI recognise the importance of the input from Natural England to any revised and refreshed Planning Policy Statement 7 covering rural areas. This is especially important given the present uncertainty over its future, especially if all its economic content is removed, as recommended in the current draft PPS4. The implications of this for the wider application of sustainable development are considerable.

The identification of priorities is important also. Even within protected landscapes there is currently a hierarchy from the National Parks, through the AONBs and down to Heritage Coasts. It will be important to plan for how might this be best reconciled, while at the same time recognising the fact that all landscapes are important and matter to local communities.

Funding will be critical over the next few years and the more effective the partnerships with Natural England, the more chance there will be of these policies being effectively delivered.

This consultation draft has highlighted several areas of joint concern on which it is hoped that both the RTPI and Natural England can work together in the future.

If you require any further assistance, please contact Rhian Brimble, RTPI Network Manager on 01443 229852 or email rhian.brimble@rtpi.org.uk

Yours sincerely,

A handwritten signature in black ink, appearing to read 'M Thomson', followed by a long horizontal flourish.

Matt Thomson
Head of Policy and Practice

Policy 1. England's nationally protected landscapes are of intrinsic value and deliver an important range of public benefits associated with a healthy and accessible natural environment. Natural England will continue to be a determined champion for their conservation, management and special status.

This policy for protected landscapes is strongly supported and it is comforting to see that Natural England intends to be 'a **determined champion** for their conservation, management and special status'. While it is important to work with a wide range of public, government and professional bodies, it is also important to remember key business and commercial interests, whose decisions can determine landscape futures and who need support and guidance to fully understand the concept and responsibilities of working within protected landscapes.

The RTPI supports Natural England comprehensively assessing the ecosystem goods and services that are provided by National Parks and AONBs. The strong public support for them is important here, complemented by the efforts and enthusiasm of many volunteers who have undertaken landscape and other conservation work over the years.

The question of priorities is important and it may be that initially more resources should be provided for Heritage Coasts and AONBs in order to bring them at least a little closer to the National Park flagships.

Policy 2. Protected landscapes are capable of delivering more for the nation. As they evolve, they should demonstrate exemplary environmental management, adaptation to and mitigation of the effects of climate change, and maximise their contribution and relevance to the needs of 21st century society both within and outside of designated areas.

The RTPI strongly supports this policy and it will be vitally important to translate the concepts of this policy into relevant planning policy documents such as Local Development Frameworks. It would be helpful if Natural England could arrange regional good practice seminars and advice jointly with planners, to improve the effectiveness of protected landscape policies.

Policy 3. Elements of public policy, legislation and guidance that govern protected landscapes urgently require review and clarification so that they can address the challenges of today and maximise their potential within and beyond the designation, as well as ensuring that all public bodies understand their own responsibilities in supporting stewardship of protected landscapes.

The RTPI agrees with the need to urgently review elements of public policy, legislation and guidance governing protected landscapes. There is no better illustration of this than the current proposals by DCLG to dismember the principal rural planning policy statement (PPS7), by removing its economic content and thus rendering it less capable of helping to deliver sustainable development in a rural context. **Particularly since, according to your consultation draft, PPS7 appears to have been effective in limiting damaging development in protected landscapes, the RTPI hopes that you will consider supporting an urgent review of PPS7.**

While it is important for all public bodies to understand their own responsibilities in supporting the stewardship of protected places, the role of private organisations and their wider social and environmental responsibilities should be considered.

The RTPI also supports the need to revisit the concept of natural beauty and strengthen it; the active promotion of landscape and habitat connectivity, and reinforcing the 'have regard' duty, which is something planners also have to contend with daily, and over which many would share your concerns.

We agree that it is important to try and achieve as much as possible without recourse to amended legislation, which will

require working very closely with as many partners as possible and reaching suitable working compromises.

The RTPI hope that Defra's planned new circular on National Parks will provide an opportunity for planners to consider positively the consultation draft.

There is clearly a need to work more effectively with the Planning Inspectorate, in order to avoid the fundamental differences and misconceptions that are listed in this draft. If the RTPI can assist in this important matter, please let us know.

Policy 4. Statutory protection should be applied to landscapes of national significance that meet the statutory designation criteria and where designation is genuinely needed and/or especially desirable. Where necessary we will use our legal powers to achieve this.

The RTPI supports this policy and it may be that in view of the many pressures on protected landscapes and the rapid rate of current social, economic and environmental change, a rolling programme of boundary reviews would be helpful where contentious issues are regularly being raised.

Policy 5. The management of Heritage Coasts needs to be reviewed and set in a new context reflecting increased recognition of the importance of the marine and coastal zone.

The RTPI supports this policy on Heritage Coasts and recognises that currently there is a weak system in place in terms of both planning controls and management. It would be helpful to try and link both terrestrial and marine planning systems at this point of 'interchange'. A strong link with Shoreline Management Plans is clearly important. It is also vital to engage with planners and to effectively integrate the conservation of the Heritage Coast in LDF planning policies, in the same way that they already do for National Parks and AONBs.

Policy 6. Partnership working is central to achieving the most effective representation, governance, management and delivery mechanisms for protected landscapes.

The RTPI strongly supports the concept of partnership working as undoubtedly a key element in achieving positive outcome within protected landscapes. Planners would like to become more effectively involved with Natural England and the [RTPI Rural Planning Network](#) would be interested in exploring ways of doing this in a mutually beneficial way. The initial contact point is Rhian Brimble, RTPI Network Manager. Rhian can be contacted on 01443 228852 or via e-mail: rhian.brimble@rtpi.org.uk

Policy 7. Protected landscapes organisations have an important role, individually and collectively, in supporting the implementation of the European Landscape Convention at an England, UK and international level.

The RTPI strongly supports this policy and can put forward the RTPI Rural Planning Network as a possible mechanism to help disseminate better knowledge and understanding of the European Landscape Convention. The role and support for nature conservation needs to be debated as a matter of some importance, perhaps looking at other member states to see how they have addressed/are addressing the potentially contentious issue of nature conservation taking priority over other objectives in cases of conflict.

General comments

It remains a matter of some concern to the RTPI that while Natural England are emphasising the important lesson that 'by applying the principles of sustainable development, protected landscapes demonstrate how adaptive management can be in dealing with conservation aims, but also alongside social and economic ones', those very same principles are

contradicted by removing economic policy from PPS7, the key rural planning policy statement; this results in a weakening of the linkages between the economic aspects of sustainable development in rural areas, including protected landscapes, from the social and environmental factors. This will lead to less clarity for practitioners on how these issues should be balanced. It is clear that there needs to be more joined-up government working to overcome these issues.