



RTPI

mediation of space · making of place

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Email response sent to: NPCircular@defra.gsi.gov.uk

Dear Sir/Madam

RESPONSE TO CONSULTATION PAPER: Consultation on the English National Parks and the Broads

The opportunity to comment on the Circular and Vision Statement for National Parks in England is welcomed. 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 the RTPI Networks following an internal consultation. Thanks are due to members of these groups for their substantial contribution in reviewing the document.

The National Parks provide landscapes of exceptional beauty, fashioned both by nature and by the communities who live in them.

This document attempts to take on board the latest thinking in environmental management and the need to address climate change and sustainability etc; however the intent of the National Parks founding acts, namely the need to conserve natural beauty, needs to be given greater emphasis within the document. Natural beauty and the need for landscape conservation are not sufficiently covered in the new vision. Instead the emphasis is on recreation and the use of resources. Whilst habitats are discussed this is considered a very narrow view of landscape and the vision is weaker for it. It needs to be more explicit earlier on in the document that Parks were designated because of their landscape value and we suggest these key messages along with the statutory purposes are revisited at the outset.

It is also important that natural beauty and landscape be given due prominence and weight within the vision as there are potential tensions here alongside the Government's development aspirations particularly associated with energy. Other policy areas, such as agricultural policy, could also have an impact on the appearance of Parks landscapes in the future.

However it is important to recognise that the health and appearance of National Parks will often depend on the communities living within the Parks, the role that they play and their connection with the landscape should not be disregarded.

To discuss this further, or 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 'Matt Thomson', with a long horizontal flourish extending to the right.

Matt Thomson

Acting Director Policy & Partnerships

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Specific Comments on the contents of the Circular

Introduction.

Timeline of Legislation and Policy Development

Reference should be made to the Sustainable Communities Act, 2007 in Section 2.1, the aim of which is to promote the sustainability of local communities. This addition would complement the emphasis on sustainable development covered in this consultation.

Sustainable Development

Paragraph 17 of section 2.2 sets out that in terms of sustainable development, support must be given to the Parks as “exemplars in achieving sustainable development and creating thriving rural communities”, while paragraph 18 explains that Parks have successfully proved themselves as models of good practice. The Parks are therefore in a strong position to share their experiences and lessons learnt with other authorities.

Vision for the National Parks and the Broads in England.

The vision for National Parks by 2050 as set out at page 7 of the consultation document is supported, but as with sustainable development, it is difficult to confine it to artificially drawn Park boundaries.

With regards to bullet point 3 on page 7, the RTPI questions if our environmental limits are fully understood, particularly given the consequences of climate change. Environmental capacity is not a static concept and will change as a result of other environmental factors. The need for continuous adaptive management in which we regularly examine where limits exist needs to be recognised within this document.

National Park Purposes.

Sandford Principle

The twin purposes of the 1949 Act can still be supported as relevant to the present day, “to conserve and enhance the natural beauty (i.e. geological features), wildlife and cultural heritage of the National Parks; and to promote opportunities for the understanding and enjoyment of the special qualities of the National Parks by the public.” Similarly the Sandford Principle remains relevant, giving precedence to the conservation and enhancement of natural beauty in case of conflict.

Conserving and Enhancing the Natural Beauty, Wildlife and Cultural Heritage of the National Parks

We welcome the use of Park Management Plans to systematically assess the risks that external factors pose to the Parks and that they are expected to place measures which capture, mitigate and or resist adverse pressures. As these external pressures are in effect outside the control of the Park Authorities, the opportunity to develop partnerships and engagement with others to develop measures should be incorporated within the requirements for the plans.

Promotion Opportunities for the Understanding and Enjoyment of the Special Qualities of the Parks by the Public

It is important that the community dimension of the National Parks is not overlooked in any consideration of Park purposes. Many factors affecting the Parks, such as climate change; farm support payments; housing and employment concerns, are also highly relevant to local communities. Conservation and enjoyment of the Parks are undoubtedly influenced by the current health and status of local communities living within them.

Paragraph 37 focuses on inclusiveness, which is vital if the Parks are to be relevant to all sectors of society who may wish to visit them for the purposes for which they were established. However, this should not result in any watering

down of park purposes or lessening of planning vigilance.

While research has indicated little irreconcilable conflict between National Park purposes, two areas of conflict have been identified and are set out at paragraph 39 - motorised recreation and the impact of organised events. Reconciliation should be undertaken wherever possible, and planning skills can be a positive asset in this task, but it is important to support the view that “not all forms of outdoor recreation are appropriate in each National Park” and activities with adverse impacts “may need to be excluded”. The power boat issue on Lake Windermere is an example of this, highlighting the tensions between recreational noise and the peace and tranquillity of the Park. There is a need to control events with the potential to harm the special qualities of the Parks. Failing reconciliation attempts, the National Parks must show firmness in the face of these potentially harmful activities.

Delivery of Park Purposes.

National Park Authorities and the Broads Authority

The RTPI supports the continued existence and development of “dedicated bodies to oversee and lead the way in which Parks are managed and conserved”.

The Economic and Social Well-Being of Park Communities

The role of local communities in helping to shape the Parks is strongly supported and the RTPI supports the Governments recognition that “there is no incompatibility between conserving the Parks and them remaining as vibrant, healthy and productive living and working communities”.

There is also support for the recognition that “by harnessing the economy to environmental ends, tangible economic benefit can be delivered through the statutory purposes and at the same time achievement of the statutory purposes is enhanced”.

Additional Key Statutory Duties of the Park Authorities.

Planning Responsibilities of the Authorities

The RTPI strongly supports the recognition that, through a suite of planning policies, “the town and country planning system is a key instrument in the achievement of Park purposes”.

Conservation of Biodiversity

Support is also given for Park authorities “to lead in the achievement of the vision for biodiversity in the Parks, giving equal weight to objectives for conserving and enhancing the landscape and cultural heritage of the Park areas”.

Government Priorities for the Parks.

While the listed priorities at paragraph 70 are supported (“climate change, enhance biodiversity, enhance cultural heritage and extract maximum value from their expenditure”) it is important to remember that such priorities depend very much on the endorsement, support, and cooperation of both Park communities and those outside the Parks who are involved with them and visit them. In that sense, Park communities and supporters must also be seen as a priority.

Helping People and Nature to Adapt to Climate Change

The RTPI supports the statement at paragraph 72 which sets out that “effective adaptation of the economy and society will rely on the continued health of the natural environment”. The economy of the Parks is only a borrowed element of their wider ecological health.

Paragraph 72 makes specific mention of “viable and adaptive environments”. Initiatives such as transition towns could

be progressed within the Parks.

Mitigating Climate Change

While many people recognise that the Parks are not static and that their special qualities may change over time, this principle is not always fully understood by Park residents and visitors alike. There is an educational job to be done, for example, demonstrating that changes in farming and grazing regimes can and will affect the appearance and accessibility of the fells and uplands. The virtual extinction of sheep grazing in Western Scotland has resulted in bracken infested hillsides and is a good example of how grazing can impact on the landscape.

Paragraph 74 urges the Parks “to reach a position where renewable energy is the norm in remote rural areas”. On this subject we also refer back to our general comments in relation to the tensions between landscape and renewable energy provision and the need for natural beauty and landscape to be given due prominence and weight within the vision.

Increasing Biodiversity

Paragraph 75 sets out that habitats in Parks are “less fragmented.” There would be an opportunity here for Parks to share experiences and demonstrate the advantages of this for the health of biodiversity.

Protecting and Enhancing Soils in Our Most Valued Landscapes

This document refers to the new Soil Strategy for England, but would be further strengthened by reference to the Natural England draft Policy for Soils and to the forthcoming Defra Soils Toolkit for Planners.

Coastal Access

The Parks along with Natural England need to engage with landowners as the work towards coastal access is carried out.

Major Developments

We are encouraged to see reference to PPS7 in relation to major developments in the Parks (paragraph 96).

Mineral Working in National Parks

The RTPI welcomes the reference to MPS1 in relation to minerals planning/working.

Contribution to Rural Economies

The RTPI fully supports the recognition set out at paragraph 100 that “the communities of our Parks are an absolutely critical ingredient to the sustainability of the Parks themselves”.

The RTPI supports the need for local economic circumstances to inform strategies and policies. The work of the Rural Advocate and of the Taylor report add considerable weight to the socio-economic duty on Park Authorities and the planning system is rightly acknowledged as a key element in fostering this duty and in ensuring that above all else, scale, form and location are correctly identified for all Park development proposals.

Paragraph 103 sets out that the Parks’ socio-economic duty is primarily fostered through an appropriate planning regime, private investment, and through support and funding from other sources. This illustrates the importance of promoting dialogue with all stakeholders.

Health and Wellbeing

The RTPI strongly supports the health and wellbeing benefit of the Parks, which remains just as valid today as it was when the Parks were first designated.

Making Tourism Sustainable

Sustainable Tourism clearly has an ever more vital part to play in the continued success of the Parks. However, it must be “sustainable” tourism. Sustainable tourism is an important component of the rural economy in National Parks, if given the opportunity to develop in a sensitive manner.

Paragraph 107 states that “the pursuit of sustainable tourism should be a critical objective for the Parks as a key contributor to the local economy and as a prerequisite for the successful promotion of the wider enjoyment of the Parks without compromising their special qualities”. Through appropriate and sensitive development proposals, sustainable tourism can help the Parks address their purpose of promoting enjoyment of the special qualities of the Parks by the public.

Government may find it useful to refer to the CLG Good Practice Guide on Planning for Tourism in relation to this subject.

Affordable Housing

The key role of the Park Authorities in doing what they can as planning authorities to deliver needed affordable housing is encouraged, in partnership with other local housing interests and providers.

Appointments by the Secretary of State

Secretary of State Members should be drawn from a wide range of interests, skills, experience, and backgrounds.

Sustainable Transport

Physical transport within the Parks remains an important issue and must be closely related to the Parks’ management plans as set out at paragraph 116. Paragraph 109 states that “all tourism related travel to and within the Parks must be sustainable”. Restraint must continue to be exercised on road provision in the Parks, and should be focussed on local traffic and the acceptable provision of effective public transport. Large-scale schemes principally to accommodate visitor traffic are considered inappropriate.

The role of parish and town councils in assisting the generation of sustainable/public transport solutions such as car sharing, and initiatives such as wheels to work, community minibus etc. should be considered (paragraph 117).

With regards to paragraph 118 the requirement for monitoring and early consultation in the development of proposals is welcomed, however highway boundary and drainage treatments can also be important elements that need to be designed to respect the local setting.

The need to explore all options and include all practicable mitigation measures is welcomed, as set out at paragraph 121.

Defence Use of Parks

Park authorities must work with the Ministry of Defence to ensure cooperation and understanding. An example of cooperative working has taken place between the Ministry of Defence and the Wensleydale Heritage Railway, who jointly ensure the continued operation of the railway through Wensleydale.

State of the Parks Report

Planners need to recognise the important role of the State of the Parks reports in contributing both evidence and vision to general planning policy.

Partnership Working

The RTPI supports the emphasis on partnership working between “public agencies, not-for-profit and voluntary organisations and the private sector” set out at paragraph 136.

Delivering in Partnership

With regard to the organisations listed in this section with whom the Parks are expected to draw upon, we consider the Commission for Rural Communities is a major omission. This organisation would make a valuable partner alongside the Regional Development Agencies in assisting the Parks.