

RTPI response to DEFRA consultation on Government response to the Landscapes Review

April 2022

This is the Royal Town Planning Institute's (RTPI) response to the Department for Environment, Food and Rural Affairs (DEFRA) consultation on the [Government response to the Landscapes Review](#).

About the RTPI

The RTPI champions the power of planning in creating sustainable, prosperous places and vibrant communities. We have over 27,000 members in the private, public, academic and voluntary sectors. Using our expertise and research we bring evidence and thought leadership to shape planning policies and thinking, putting the profession at the heart of society's big debates. We set the standards of planning education and professional behaviour that give our members, wherever they work in the world, a unique ability to meet complex economic, social environmental and cultural challenges.

General comments

Holistic treatment of Environment Matters

In the wake of Brexit and the commendable renewed commitment to the environment on the part of UK Government, there are a number of initiatives currently taking place which risk being at best challenging to coordinate on the ground, and at worst potentially detrimental to other Government objectives such as the operation of the planning system.

We have recently commented on Biodiversity Net Gain so will not repeat those comments here, except that on page 18 it says that BNG "will create new opportunities to conserve and enhance habitats and ecological networks, including within protected landscapes". Our comments on BNG do stress that the success of BNG in doing this depends on a careful focus on outcomes and on monitoring, not simply observing a process.

The multiplicity of initiatives does point to the need for joined-up local delivery strategies on the environment. We have proposed [Local Environment Improvement Plans](#) (LEIPs) to build on statutory Local Nature Recovery Strategies but go further to cover water and climate matters. LEIPs would draw together funding from ELMS, Biodiversity Net Gain, water companies' investment etc in democratically driven strategies for wider areas.

Climate action

We strongly support the addition of both climate and nature to the purposes of national parks. Despite there being a Chapter on Nature and Climate, the consultation document does not go very far at all to explore *the ways in which* protected landscapes could support action on climate, nor how the Government would act in order to get this done. There are wide-open opportunities to both reduce the *impact* of visitors to our national parks and AONBs in terms of CO2 and other emissions; and also, to increase the *role* of landscapes in reducing the climate impact of wider areas, such as through carbon sequestration and flood prevention. It is one thing to add to the purposes of protected landscapes, but another to implement these purposes.

Again, it is essential that landscapes are seen the full lens of ecosystem services *in toto*, and not simply in visual or (current) economic terms.

Commercial

We recognise and support the need for economic activities to take place in national parks. It is often only through the continued economic health of these areas that a well-managed landscape can be achieved. However, this should be balanced with enabling public access to these spaces. The benefits of access to open space are huge and any proposals which seek to gain commercially should not unduly restrict public access.

Housing

The Government seems very strangely silent on the key issue of meeting local housing need in protected landscapes. This is despite a very thorough examination of these issues in Chapter 3 of the Glover Review. The data on house prices and incomes in the Review may now be even worse three years on. These areas are subject to extraordinary demand from outsiders in what is becoming practically a national political priority issue.

A stronger mission for nature recovery

6. Should a strengthened first purpose of protected landscapes follow the proposals set out in Chapter 2?

Yes. But it could go much further. Proposal 4 in the Glover Review referred to the role of protected landscapes as the backbone of wider nature recovery beyond their boundaries. Local Environment Improvement Plans would be an ideal way of achieving this.

7. Which other priorities should be reflected in a strengthened first purpose e.g. Climate, cultural heritage?

Addressing climate change should be added to the first purpose.



Agricultural transition

8. Do you support any of the following options as we develop the role of protected landscapes in the new environmental land management schemes?

- **ELMSs to reflect the specific circumstances of protected landscapes**
- **LNRS to identify protected species or habitats**
- **Monitoring the effectiveness of ELMs in protected landscapes**
- **Protected landscape organisations to have role in LNRSs**
- **Using protected landscape expertise in designing ELMSs**

We would agree that all of the above mechanisms would help. In addition, we propose going beyond LNRS to Local Environment Improvement Plans which would not only involve landowners and managers but the wider public in agreeing priorities for land use and investment in nature recovery.

9. Do you have any views or supporting evidence you would like to input as we develop the role of protected landscapes in the new environmental land management schemes?

Protected landscapes could potentially play a key role in delivering several ecosystem services. These cover, but are not limited to:

- Rewilding and biodiversity gain
- Water retention and flood risk reduction
- Public access to nature and landscape

ELMS should be about delivering these kinds of benefits, in both protected landscapes and elsewhere.

A stronger mission for connecting people and places

10. Should AONBs have a second purpose relating to connecting people and places, equivalent to that of National Parks?

We support AONBs having the same second purpose as national parks. AONBs are often closer to centres of population (especially in central and southern England) and so having this as a purpose would be beneficial.

Improving access to protected landscapes and addressing the current inequality in those accessing the landscape should be seen as a priority. However, this will need balancing with managing visitor pressure, particularly for very popular areas and sites. We are supportive of ensuring that our protected landscapes are accessible to all. However, with the lack of commitment to improved funding, it will be a challenge for the protected landscapes to deliver the long-term engagement activities required to increase the diversity of people using and enjoying these special landscapes. There is also no reference in the Government response of the Glover Review's recommendation to introduce a "Night under the Stars" for every child in a protected landscape.



11. Should a strengthened second purpose of protected landscapes follow the proposals set out in Chapter 3 to improve connections to all parts of society with our protected landscapes?

Yes. It is important that protected landscapes are accessible to all parts of society. But the proposals do not go anything like far enough to reduce visitor car access to national parks and increase public transport access.

By contrast with the best European practice (e.g., Alto Adige/Sudtirool, Italy; Switzerland; Austria) public transport in our national parks is still poor and badly coordinated. And as a result, congestion on narrow country lanes in our parks is seriously out of hand. Chapter 3 of the Glover Review goes into some detail regarding the seriousness of this situation. There are numerous consequences. While DEFRA is keen to encourage rural business, operating a business in a national park in busy tourist periods is stymied by unrestricted car use. Bus access to remote areas is hindered by congestion. And emissions from tourist cars add to total UK emissions.

The DEFRA proposals seem to be a more of a reflection of current activity rather than support for a step change. It appears that work on promoting sustainable transport is being delegated to Local Transport Plans, without additional measures to address the issues. Many existing initiatives seem to focus on transport for *residents* rather than visitors. Improving access for visitors would also improve access for residents but the key challenge is visitor pressure.

Initiatives such as the *coordination* of public transport in the Lake District would be welcomed, but if buses are still infrequent (e.g., summer weekdays very poorly served) and also held up in traffic, nothing will change. We note the consultation document only says that initiatives in the Lakes “*may*” transform public transport: this seems like rather a weak commitment.

12. Are there any other priorities that should be reflected in a strengthened second purpose?

Purpose 2 should retain its link to the special qualities of protected landscape. People should visit individual national parks to enjoy their special qualities whether it is climbing mountains in the Lake District or boating in the Broads. Leisure development which can be accommodated in non-protected areas does not need to be in national parks and AONBs.

Managing visitor pressures (p16)

13. Do you support any of the following options to grant National Park Authorities and the Broads Authority greater enforcement powers to manage visitor pressures? Tick all that apply.

- **Issue Fixed Penalty Notices for byelaw infringements**
- **Make Public Space Protection Orders (PSPOs)**
- **Issue Traffic Regulation Orders (TROs) to control the amount and type of traffic on roads**

It is not clear that National Park Authorities (NPA'S) have any in house expertise on these matters and without extra funding would not be able to roll them out. Public Space Protection



Orders are already being developed and exist in some NPA areas. However, they have been led by one or more local authorities. Giving NPA's that power could simplify the process and enable more coherent regulation.

Use of Traffic Reduction Orders seems like only a last-resort measure and surely the focus should be on increasing access by alternatives to the car (see question 11), not simply restriction.

14. Should we give National Park Authorities and the Broads Authority and local highway authorities additional powers to restrict recreational motor vehicle use on unsealed routes?

No answer proposed for this question.

15. For which reasons should National Park Authorities, the Broads Authority and local authorities exercise this power?

- Environmental protection
- Prevention of damage
- Nuisance
- Amenity

No answer proposed for this question.

16. Should we legislate to restrict the use of motor vehicles on unsealed unclassified roads for recreational use, subject to appropriate exemptions?

Yes. And ensure that private landowners use this only where there is a clear evidenced case.

17. What exemptions do you think would be required to protect the rights and enjoyment of other users e.g., residents, businesses etc?

Those who need access for business purposes, such as vehicles of farmers and other landowners, the emergency services, and those for whom access is difficult such as blue badge holders and mobility scooters.

The role of AONB teams in planning

18. What roles should AONBs teams play in the plan-making process to achieve better outcomes?

AONBs should be encouraged to work with the Local Planning Authorities that cover their protected landscape on joint development plan documents and vice versa. This should be a collaborative process instead of the AONB being a statutory consultee to the process.

19. Should AONB teams be made statutory consultees for development management?

No.

AONB teams are very small and would not currently have capacity to be statutory consultees.

20. If yes, what type of planning applications should AONB teams be consulted on?

No response (see above)



Local governance

21. Which of the following measures would you support to improve local governance?

Tick all that apply.

- Improved training and materials
- Streamlined process for removing underperforming members
- Greater use of advisory panels
- Greater flexibility over the proportion of national, parish and local appointments
- Merit-based criteria for local authority appointments
- Reduced board size
- Secretary of State appointed chair

We recommend allowing appropriate flexibility regarding board size. On the Secretary of State appointed Chair, it should be noted that the Secretary of State already appoints a proportion of board members.

22. Should statutory duties be strengthened so that they are given greater weight when exercising public functions?

The duty needs considerable strengthening i.e., “have special regard” and “furthering the purposes”. The Protected Landscapes Partnership should produce a regularly updated list of relevant bodies and report on their performance against the new duty.

23. Should statutory duties be made clearer with regards to the role of public bodies in preparing and implementing management plans?

No answer proposed for this question.

General power of competence

24. Should National Parks Authorities and the Broads Authority have a general power of competence?

A General Power of Competence would assist National Park Authorities in, for example commercial operations and partnerships to support the delivery of Management Plan outcomes.

25. If you have any further comments on any of the proposals in this document, please include them here.

Night under the stars: There were many important issues raised by Julian Glover that have not been addressed, for example, that each child should have a night under the stars. This is a missed opportunity.

Funding: Although new duties are proposed for protected landscape, no extra funding is proposed.

Diversity: No measures are proposed to tackle the lack of diversity among the people who visit our protected landscapes, despite this being a Proposal of the Glover Review.



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Planning: The document claims that “permitted development rights can play an important role in delivering new homes, particularly in rural areas”. This seems a very strange claim. Where is the evidence that the rights conferred on landowners in 2013 are actually meeting rural housing need? The “right” to convert agricultural buildings into homes is creating isolated dwellings in countryside that aren’t affordable and aren’t sustainable.

Behaviour: We are disappointed that DEFRA has not made proposals to tackle uncontrolled camping and caravanning in national parks, which are damaging the parks and also reducing both residents’ quality of life and other visitors’ experience.