

## Communities and Local Government Committee inquiry – Abolition of Regional Spatial Strategies

Response of the Landscape Institute

September 2010

---

### Introduction

The Landscape Institute (LI) is an educational charity and chartered body responsible for promoting the protection, conservation and enhancement of the natural and built environment for the benefit of the public. It champions sustainable, well-designed and well-managed urban and rural environments. The LI's university accreditation and professional procedures ensure that the designers, managers and scientists who make up the landscape profession work to the highest standards. There are 6000 professional members working across both the public and private sectors, both within the UK and elsewhere across the world. Our advocacy and education programme promotes the landscape profession as one which focuses on design, environment and community in order to inspire great places where people want to live, work and visit.

### Summary

Our response to the Committee inquiry largely focuses on the significant role of green infrastructure (GI) in meeting a wide range of policy objectives, and the need to plan for GI at a scale that is larger than that covered by local authorities. The abolition of Regional Spatial Strategies could have a detrimental impact

1. *The likely effectiveness of the Government's plan to incentivise local communities to accept new housing development, and the nature and level of the incentives which will need to be put in place to ensure an adequate long-term supply of housing.*

We believe that sustainable supply solutions will require high standards and minimal impact from the start to ensure the widest possible acceptance of schemes by local communities. Some possible examples can be found in the Landscape Institute's position statement on the subject of housing

2. *The arrangements which should be put in place to ensure appropriate cooperation between local planning authorities on matters formerly covered by RSSs (e.g. waste, minerals, flooding, the natural environment, renewable energy).*

There is a grave risk of the erosion of landscape character, local distinctiveness and the functionality of the natural environment resulting from both the RSS abolition and incentivisation of local communities to build. The Landscape Institute recognises that some cross-boundary matters may well be picked up by the Local Enterprise Partnerships (LEPs), if they are to fulfil a planning function. However, it is important to remember that it is unlikely that LEPs will cover the entire country, nor will they necessarily be charged with delivering on matters formerly covered by RSSs. Furthermore, there may well be instances where cooperation between LEPs is necessary.

3. *The adequacy of the proposals already put forward by the Government, including a proposed duty to cooperate and the suggestion that Local Enterprise Partnerships may fulfil a planning function.*

The Landscape Institute welcomes this approach. It is crucial that LEPs, if they are to fulfil a planning function, ensure that this incorporates adequate consideration of the natural environment. The natural environment, through the ecosystem services it provides, has a significant role to play in delivering economic benefits.

**1. The likely effectiveness of the Government's plan to incentivise local communities to accept new housing development, and the nature and level of the incentives which will need to be put in place to ensure an adequate long-term supply of housing.**

1.1 Recent research<sup>1</sup> commissioned by the National Housing Federation found that up 85,000 planned homes have been scrapped by councils across England in the wake of the Government's decision to axe regional housebuilding targets. At the same time, there is a general acceptance that there is a need to increase the supply of housing<sup>2</sup>. The Government must therefore put plans in place that respond adequately to the housing shortage issue. We believe that sustainable supply solutions will require high standards and minimal impact from the start to ensure the widest possible acceptance of schemes by local communities. Some possible examples can be found in the Landscape Institute's position statement on the subject of housing<sup>3</sup>.

1.2 We are concerned that the proposals for incentivising communities, as promulgated by Policy Exchange in its document *Making Housing Affordable*, are unrealistic because:

- It is unlikely that a settle of 2,000 houses could easily accommodate a further 1,000 houses without significant impact on the local environment;
- It is not just areas of special value, such as AONBs and National Parks, where consideration needs to be given to impact on landscape character, local distinctiveness, place-making and functionality in terms of green infrastructure. A local planning authority's "off-limit" zones might be quite hard to defend.
- In the example cited, a developer would be handing over £2million of their profits to the community and/or householders;
- £10,000 per household is a considerable amount of money and the Landscape Institute believes it is unlikely that 2,000 existing households would all be willing to contribute such sums to community facilities such as a park, as suggested, or reach agreement on how the money should be spent;
- Despite ministerial protestations to the contrary, it will be perceived as bribery; and
- Revenue must also be available for the management and maintenance of the facilities constructed from the incentivisation money.

1.3 The Landscape Institute has concerns that the Community Right to Build (CRtB) scheme may conflict with previously developed, non-statutory community plans such as parish plans and village design statements. It will also be crucial, in light of proposals that housing development under CRtB will take place outside of the current planning system, to ensure that adequate minimum criteria on, for example, design and sustainability are developed and enforced.

1.4 We feel it will be important to define what a community is and how it will relate to who is invited to vote in any referendum under CRtB. This will be very important in terms of fairness and transparency. For example will the referendum encompass the entire parish in which the proposed new housing development is situated, or part of the parish, for example, the householders in the village? Outlying rural households may house important community members and it will be important to gauge their views as well. In particular we feel this is the case if a parish plan exists as that will be the community aspiration, into which all the parish will have already had the opportunity to give views.

1.5 We are also concerned about the sustainability of community leadership. In our members' experience of community leadership for projects such as parish plans, parks' friends groups etc, there is often a reliance on one or two individuals, with little or no scope for succession planning should something happen to them. We recognise the CRtB proposes a corporate entity, but if the initial enthusiasm is vested in a limited number of individuals, its sustainability could be precarious.

1.6 We also know that parish councils can feel threatened by what they perceive to be groups that are not democratically elected, taking the lead in local matters, leading to tensions. This may well be the case for

---

<sup>1</sup> [www.housing.org.uk/default.aspx?tabid=212&mid=828&ctl=Details&ArticleID=3092](http://www.housing.org.uk/default.aspx?tabid=212&mid=828&ctl=Details&ArticleID=3092)

<sup>2</sup> [www.communities.gov.uk/housing/about](http://www.communities.gov.uk/housing/about)

<sup>3</sup> Landscape Institute (2010), Making it home: the power of landscape to create good housing, Landscape Institute

CRtB groups and this will need to be taken in to consideration. In our members' experience there are often different factions even in small village communities; landowners, those who want development for the betterment of the settlement, those who do not want development at any cost. It may be difficult to reconcile such differences. We appreciate the referendum is the mechanism for deciding. However it would be resource intensive for local authorities to have to organise many of these referenda. The wording of the questions on the referenda will also be important in terms of achieving fairness and transparency; and this may be a skill not held in house by local planning authorities.

**2. The arrangements which should be put in place to ensure appropriate cooperation between local planning authorities on matters formerly covered by RSSs (e.g. waste, minerals, flooding, the natural environment, renewable energy).**

2.1 The Landscape Institute is encouraged by the content of a recent Defra publication<sup>4</sup> which, with regards the natural environment, states that:

*"Some issues will require partnership working between neighbouring local authorities, because nature and its services do not align themselves neatly to administrative boundaries. For example, on water management, biodiversity and habitat protection, green infrastructure and air quality."*

2.2 Here, the Government has acknowledged that there will continue to be a need for planning at a 'larger-than-local' level on matters which do not necessarily fit within the administrative boundaries of local authorities. The document goes on to add:

*"...on issues such as planning, food production, water, flood risk management and biodiversity, where the impacts of our decisions do not stop and start with administrative boundaries, we need to move towards more integrated, management approaches that work at the spatial scale that best addresses the challenge. These are often call 'landscape-scale' approaches. At the same time, we need to start making decisions that encompass all of the multiple benefits we receive from the land, rather than just focusing on one objective at a time – an approach which is wasteful at best and at worst limits our capacity to manage real risks such as flooding and climate change"*

2.3 The Landscape Institute strongly agrees with thinking expressed here and has made representations<sup>5</sup> to Communities and Local Government previously, backing the need to plan strategically in order to minimise any adverse impacts that may arise as a result of the loss of Regional Spatial Strategies.

2.4 The Landscape Institute recognises that some cross-boundary matters may well be picked up by the Local Enterprise Partnerships (LEPs), if they are to fulfil a planning function. However, it is important to remember that it is unlikely that LEPs will the entire country, nor will they necessarily be charged with delivering on matters formerly covered by RSSs. Furthermore, there may well be instances where cooperation between LEPs is necessary.

**3. The adequacy of the proposals already put forward by the Government, including a proposed duty to cooperate and the suggestion that Local Enterprise Partnerships may fulfil a planning function.**

3.1 Information relating to Government proposals that Local Enterprise Partnerships could fulfil a planning function is limited and, where it does exist, is not sufficiently detailed to allow for a thorough assessment. However, the Landscape Institute is encouraged by two resources relating to this matter.

3.2 The first, a letter from Eric Pickles and Vince Cable to local authority and business leaders, dated 29 June 2010, states that:

---

<sup>4</sup> Defra (2010), An invitation to shape the nature of England: discussion document, Defra.

<sup>5</sup> [www.rtpi.org.uk/item/3937/23/5/3](http://www.rtpi.org.uk/item/3937/23/5/3)

*Local Enterprise Partnerships will need to create the right environment for business and growth in their areas, by tackling issues such as:*

- *Planning*
- *Housing*
- *Local transport*
- *Infrastructure priorities*
- *Employment and enterprise*
- *Transition to the low carbon economy*

3.3 It is encouraging that the Government recognise the importance of planning in creating the right environment for business and growth and the expectation that Local Enterprise Partnerships will need to pay attention to this important matter. This is particularly important given the recent abolition of Regional Spatial Strategies, which played a key role in planning at the 'larger-than-local' level.

3.4 The second resource, contained within Defra's, *An invitation to shape the nature of England: discussion document* (July 2010), states:

*"The Government is also considering ways to support Local Enterprise Partnerships, and provide an opportunity at this level to further promote the economic benefits from a healthy natural environment and all its services"*

3.5 The Landscape Institute welcomes this approach. It is crucial that LEPs, if they are to fulfil a planning function, ensure that this incorporates adequate consideration of the natural environment. The natural environment, through the ecosystem services it provides, has a significant role to play in delivering economic benefits.

3.6 The Landscape Institute believes that the primary mechanism for achieving this will be through the strategic planning of green infrastructure (GI) across the geographical extent to be covered by each LEP. LEPs must recognise the true value of a multifunctional, (GI) approach in achieving economic health and sustainability of an area. The Landscape Institute has outlined previously the economic benefits of GI in its position statement<sup>6</sup> on the subject, including:

- The positive impact of green space on land and property values
- The creation of settings for investment
- Providing a catalyst for wider regeneration
- Job creation
- Tourism opportunities

3.7 These benefits, broadly outlined in the Landscape Institute's position statement, are supported by case studies. One of these, Crewe Business Park, South Cheshire, recognised from the outset the important role of GI in delivering economic objectives. In this instance, the business park has generated £4.5 million in capital receipts and created over 2,800 jobs. Crewe Business Park has been successful in attracting major companies, with some explicitly stating that the high environmental quality played a key role in their decision making process. Furthermore, the development has acted as a catalyst for wider investment, such as the Manchester Metropolitan University South Cheshire Faculty.

3.8 The North West has also been leading on research into the economic value of GI. One report<sup>7</sup> finds that the region's environment generates an estimated £2.6 billion in Gross Added Value (GVA), and

---

<sup>6</sup> Landscape Institute (2009), *Green infrastructure: connected and multifunctional landscapes*, Landscape Institute, London.

<sup>7</sup> Environment Agency (2006), *Environmental Economy Report for the North West*, Bridge Economics.

supports 109,000 jobs. More recently, work undertaken on behalf of the Mersey Forest found that GI investment generated, on an annual basis, a gross monetised benefit of £5.5 million<sup>8</sup>.

- 3.9 The Landscape Institute believes that there are significant benefits in the LEPs taking a lead in strategic GI planning in terms of delivering against their economic objectives. LEPs will, in the main, be the right size of area to be able to take strategic cross-boundary and less parochial views than one local authority area, but will still be small enough for meaningful specific spatial intentions to be spelt out in a way that is readily understood by communities and developers.
- 3.10 We are keen therefore that Government promotes to LEPs, as has been suggested by Defra, the important role of the natural environment, and therefore GI, in delivering economic growth.
- 3.11 The strategic planning of GI, within the context of LEPs, will be central to achieving this. It is therefore fortunate that some proposed LEPs already have a basis for doing just this. For example, the proposed Solent LEP, which brings together the Partnership for Urban South Hampshire (PUSH) and the Isle of Wight, has a GI strategy<sup>9</sup> in place which will partially cover the LEPs geographical extent. Similarly, a GI strategy<sup>10</sup> has already been prepared for the Leeds City Region, an area which we note has also submitted proposals to become an LEP.
- 3.12 Despite efforts by Government to promote the role of the natural environment or GI, the Landscape Institute anticipates that not all LEPs will view the GI approach as an important priority, nor will they have the skills to undertake or even commission this work. It is here, that CABE Space's expertise in GI strategy formulation and CABE's expertise in sub-regional scale spatial planning will be of particular relevance and would be a useful centre of excellence for good practice.

*Prepared for the Landscape Institute by:*

*Annie Coombs FLI  
Ian Phillips CMLI MRTPI*

*For further information relating to this submission, please contact Stephen Russell, Policy and Public Affairs Officer, at:*

*Email: [stephenr@landscapeinstitute.org](mailto:stephenr@landscapeinstitute.org)  
Tel: 0207 299 4537  
Address: 33 Great Portland Street, London W1W 8QG*

---

<sup>8</sup> Regeneris Consulting (2009), The economic contribution of the Mersey Forest's Objective One-funded investments, Mersey Forest.

<sup>9</sup> [www.push.gov.uk/push\\_gi\\_strategy\\_adopted\\_june\\_10-3.pdf](http://www.push.gov.uk/push_gi_strategy_adopted_june_10-3.pdf)

<sup>10</sup> [www.leedscityregion.gov.uk/uploadedFiles/Leaders\\_Board/Meetings/Item%208%20Appendix%20A%20-%20Final%20LCR%20Green%20Infrastructure%20Strategy%20V5%20with%20maps.pdf](http://www.leedscityregion.gov.uk/uploadedFiles/Leaders_Board/Meetings/Item%208%20Appendix%20A%20-%20Final%20LCR%20Green%20Infrastructure%20Strategy%20V5%20with%20maps.pdf)