

The Landscape Institute

The Landscape Institute (LI) is the royal chartered body for the landscape profession. As a professional organisation and educational charity, we work to protect, conserve and enhance the built and natural environment for the public benefit. The LI represents 5000 landscape architects, planners, designers, managers and scientists. We champion multifunctional and sustainable landscapes in both town and country. We believe that through careful and appropriate planning, design and management, it is possible to deliver a wide range of environmental, social and economic benefits. We therefore welcome this inquiry and the opportunity it presents to submit evidence on such an important matter. We recognise that its creation stems from the work of Sir Terry Farrell and his Review of Architecture and the Built Environment and a subsequent debate in the House of Lords in July 2014ⁱ. It is therefore appropriate at the outset to quote Sir Terry Farrell's review reportⁱⁱ which stated that:

"Landscape should be seen as the primary infrastructure which creates value directly and indirectly. Government and built environment professionals need to reprioritise the importance of its role and perception in placemaking. This applies at all scales, from streets to parks to regional planning."

We fully support this statement, but would go further and add that on a small and heavily populated island there is a symbiotic relationship between the built and natural environment. We believe that decisions about shaping the built environment can no longer be separated from rural land use and its management. Significant challenges – climate change resilience, renewable energy, supplies of clean water, the sustainability of food production, carbon sequestration, improved biodiversity and public health and wellbeing – demand an integrated approach to the way we plan, design and management the built environment; one that considers the relationship between town and country and the essential services provided by natural systems.

The responses provided here are numbered in accordance with the questions posed in the call for evidence.

Questions 1 and 2: Policymaking, integration and coordination

1.1 There is a gulf between policy objectives at the national level, such as those enshrined in the National Planning Policy Framework (NPPF), and local planning. Neighbourhood planning has provided a tier which, in theory, enables local people to have a greater role in shaping where they live. This should help ensure the built environment is responsive to the needs and aspirations of local communities. However this is clearly not suited to address the gap between national and local policy which resulted from both the abolition of regional spatial planning and county level structure plans. We consider these steps a mistake as they were a critical connection between national priorities and needs, many relating to the built environment, with local decision making. National policy can only provide the context within which strategic decisions can be made. Unless the Government is prepared to develop a national spatial plan, it has to delegate strategic decision making to an effective sub-national level which no longer exists. The 2011 Communities and Local Government Select Committee inquiry reportⁱⁱⁱ into the abolition of regional spatial strategies stated that:

"The Government must ensure that the beneficial and positive aspects of Regional Spatial Strategies, in particular for integrating infrastructure, economic development, housing, data collection and environment protection, are not swept away, but are retained in any new planning framework."

- 1.2 Mechanisms designed to fill this void, such as the Duty to Cooperate, have in our view failed to deliver a similar level of integration on matters relating to the built environment and the relationship between town and country. Political differences and strategic priorities between neighbouring authorities can make effective cooperation, in terms of planning policies, difficult to achieve.
- 1.3 Adding to this, Government has reduced available guidance and archived many documents published by statutory consultees who employ the professionals with the skills and experience to ensure better quality placemaking in the built environment. The resultant loss of status of these documents at planning inquiries, together with the loss of funding for staff, advice and research, undermines the importance of these organisations in protecting and enhancing our built and natural environment.
- 2.1 There is insufficient policy coordination between Government departments. The challenges facing our built environment are the responsibility of different Government departments and agencies, each with their own priorities. The NPPF, and its accompanying NPPG does appear to acknowledge the varying considerations that need to be taken into account in planning, designing and managing the built environment. However, it is insufficient in its acknowledgement of the interrelationships between matters such as housing, design, transport, infrastructure, sustainable and heritage.
- 2.2 Green infrastructure (GI) is a concept we have been championing since 2009^{iv}. An underling principle of the concept is the way in which natural systems, when planned and designed properly, deal with many pressures facing our built environment. All too often these are approached as separate issues. GI evolved in response to a growing recognition that those planning and designing urban areas often ignored the interactions between issues such as public health, flood management, housing delivery, biodiversity, climate change adaptation and recreation. GI is an integrated approach which provides the ecological services that are needed to ensure towns and cities are more sustainable.
- 2.3 The potential benefits of greater policy support for GI are enormous; however it is not within the remit of any one department or agency and messages from Government are mixed. Steps have recently been taken by DCLG to improve National Planning Practice Guidance on GI, and this is to be commended. But the Government's recent refusal to accept the Natural Capital Committee's recommendation^v that the National Infrastructure Plan should incorporate natural capital (which itself is enhanced through GI approaches to land use) into each of the main infrastructure sectors is unhelpful to say the least and will undermine efforts to deliver the liveable towns and cities we need.
- 2.4 Housing supply is one of the most pressing issues facing our built environment. This cannot be delivered sustainably in isolation from other policy objectives, such as health and wellbeing, design quality, water management, transport and GI. There has been progress in recent months, for example the transfer of responsibility for architecture from DCMS to DCLG. However this represents a relatively insignificant improvement. It appears that, for housing, piecemeal investment decisions made by the Treasury without a national strategy, promote and subsidise development in locations that are justified only by economic imperatives rather than a balance of social, environmental and economic benefits as required by NPPF. GI, which has the ability to deliver substantial economic, social and environmental benefits and are promoted in both NPPF and NPPG, are not mentioned in any Treasury statements.
- 2.5 We therefore suggest three potential ways in which policy coordination across Government could be improved:
 - Clarity on departmental responsibility for green infrastructure, given its role in working with nature to deliver a range of policy objectives; and

- Require all Government departments abide by a Duty to Cooperate, similar to that expected by the NPPF of local authorities to ensure better alignment of national strategies and policies for housing, infrastructure, the natural environment, water management and sustainability.

Questions 3, 4 and 5: National policy for planning and the built environment

- 3.1 It is not the purpose of the NPPF alone to provide guidance. The NPPF provides the context and aims to be met, but the National Planning Practice Guidance (NPPG) is essential in supplementing the NPPF with detail to assist the planning, development and protection of the built and natural environment.
- 3.2 We believe that the NPPF still favours short-term economic objectives that override longer-term social and environmental goals. This could result in a greater future economic burden on the public purse and constrains the ability to provide the necessary development process that will deliver a built environment to support resilient places that can meet a variety of future challenges.
- 3.3 The wording of the opening text of the NPPF regarding sustainable development is weak and needs improving. While the concept of sustainable development is a complex one, the NPPF unravels the term and complicates matters unnecessarily. Ultimately sustainable development is about ensuring that decisions made now on meeting current needs to not compromise the ability of future generations to meet their own needs. It is unfortunate that this fundamental idea does not appear to given any consideration in the current wording of the NPPF. We believe that more emphasis should be given to high quality and distinctive place making in the built environment with a greater appreciation of the ways in which multifunctional GI can help address additional planning objectives, such as climate change adaptation, resilience, health and wellbeing, water management, biodiversity and energy production.
- 3.4 The NPPF also fails to establish the need to consider the relationship between the built and natural environment, and town and country. Insufficient emphasis is given to multifunctional use of rural land and its potential services to urban living.
- 4.1 National planning policy is failing because it has no spatial context. A spatial planning approach is necessary to properly align all sectoral policies that have a territorial impact to achieve the ambitions set out in the NPPF. The effects of sub-national spatial plans would include the coordinated delivery of housing need, availability and effective targeting of investment, appropriate planning of linear infrastructure such as rail, road and energy transmission and environmental protection/improvement.
- 4.2 The most effective scale of spatial planning is a combination of the national character mapping work, undertaken by Natural England, with the pattern of existing urban areas. Greater use should be made of the National Character Areas^{vi} to inform the planning, design and delivery of housing, transport, infrastructure, sustainability and heritage. NCAs divide England into 159 distinct areas, each defined by a unique combination of landscape, biodiversity, history, culture and economic activity. Their boundaries follow natural lines in the landscape, rather than artificial administrative boundaries. If these were used as the spatial framework within which national policy was translated into local decision making it would help ensure that future design and planning of the built environment was more responsive to its unique location and wider rural hinterland.
- 5.1 This is a complex matter with different forms of infrastructure, and a need to consider the capacity for renewal and retrofitting alongside improvements in technology. Matters such as climate change forecasts, ageing populations, housing demand as well as energy and food security all need to be considered. We suggest that optimum timescales for planning our future built environment could benefit from

consideration of two excellent pieces of research, published by the Government Office for Science / Foresight. Land Use Futures (2010) and Future of Cities (2015) both explore challenges facing our built environment over longer timescales and the policy interventions required to meet them.

Questions 6, 7 and 8: Buildings and places – New and old

6.1 The current housing shortage presents a complex challenge and the location and development of new housing is always a contentious issue. The scale of housebuilding required to meet the current shortage will result in a significant degree of change to our landscape. This change is an opportunity to enhance our environment, not a threat which should be resisted.

6.2 Housing quantity cannot be divorced from housing quality. England features many low-quality, poorly-designed, housing estates which are out of keeping with their local landscape. This is a significant barrier in increasing the supply of housing. Local communities often expect that new housing will be of poor quality and will impact negatively upon their local environment. This can lead to objections causing delays in the planning process or failure to receive planning permission. This is supported by research from the Local Government Association. Its New Housing Developments Survey^{vii} (2010) found that 61 per cent of local councillors considered public opposition to be a significant barrier to housing development. When asked what would make housing development more acceptable to local communities, the following responses were given:

- Ensuring housing came with improved services and facilities (including green space) – 82 per cent;
- Involving local communities in early discussions about design – 56 per cent;
- Ensuring a commitment to excellent design – 65 per cent

6.3 It is clear from this research that improved design, provision of green space and involvement of local communities are key to overcoming local opposition to new housing. All three can be tackled by a landscape-led approach to housing development. By this we mean an approach to the planning and design of development that considers and responds to landscape character. By working with landscape from the very outset of development, it is possible to achieve distinctive local character in housing developments and a public realm where communities can interact and thrive. At present, landscape is often an afterthought in the house building process and in order to improve quality, and at the same time increase support for new housing, it needs to take centre stage.

6.4 Building for Life 12 (BfL12) has the potential to achieve a real change in the quality of new housing. BfL12 is a traffic-light system which assesses the quality of development. The system asks 12 questions of development proposals, 11 of which are reliant upon landscape planning and design. Greater use of BfL12 by local authorities during pre-application discussions could play a considerable role in improving design, thereby reducing opposition to new development. It would also have the benefit of tackling poor design issues that may arise at a later stage which can result in greater costs and delays to delivery of housing.

7.1 In his report on the Review of Architecture and the Built Environment, Sir Terry Farrell stated that:

“Landscape architecture and urban design are often the most valued by the public yet contradictorily the least valued in terms of fees and are frequently where the first savings are made on any given project. Something has to be done about this, and we as an industry must make landscape and urban design much bigger priorities.”

However little appears to have changed since the publication of the report. It is vital for the Government to step in to address evident market failure. The market is unable to deliver built environments that are

sustainable and resilient. The financial model for the volume developers is, in their current mode of operation, risk adverse and unable to capture the external disbenefits of their product that put a cost on the public purse. Sir Terry Farrell goes on to state that:

“Governments certainly don’t have all the answers...But the private sector does not act at the large strategic scale either, as it tends to be driven by short-term profits and the bottom line. We need leadership from private and public sectors that is not subject to the short-term political cycles and changes of government or driven by short-term profits and share values.”

We would also point the Committee to recommendation 52 of the report, which suggests that:

“Government could explore policies to incentivise private-sector contributions to public-realm and infrastructure improvements and address the perceived “market failure” whereby landowners who benefit financially from improvements are not always the ones to pay for them.”

7.2 Green infrastructure (GI) is just one aspect of the landscape and despite increasing interest in the concept, understanding of its potential to contribute to sustainable, resilient and adaptable built environments is still lacking. As stated previously, the integration of natural systems and processes within and between our settlements enables the delivery of a wide range of benefits for the economy, society and the environment. We believe there are a number of barriers which Government might help overcome:

- a number of local authorities do not have GI strategies in place and many appear not to be working strategically with neighbouring authorities;
- there is no statutory duty to protect or maintain green infrastructure assets;
- reduced public spending has had a number of negative impacts, including a lack of funding for maintaining existing assets, let alone the delivery of new GI close to where people live. It has also reduced the number of individuals within local authorities with the skills necessary to plan, design and manage GI;
- the natural environment is still seen as a ‘nice to have’ and as a result GI is afforded a lower priority; and
- a failure to plan in the long-term and the lack of interest in strategic planning. This is particularly pertinent to GI as the benefits it delivers accrue over time.

7.3 Making best use of the existing house stock and making places more liveable was achieved in the 1970s and 1980s by funding for local authorities to implement Housing Action Areas (HAAs) and General Improvement Areas (GIAs). These enabled residents to engage in improvements to their external environments. Local people influenced change and made their neighbourhoods better places to live. If the Government could see the value of such a proactive approach they might provide funding for improvements in deprived urban areas where market values fail to attract private investment.

8.1 The historic environment is important because it helps to define the cultural identity of our nation, and also because it attracts visitors and generates income. However, the present relentless drive for growth encourages landowners and investors to develop and manage land intensively for a variety of purposes that often result in damage to the character and appearance of the landscape. Regeneration often involves new land uses and whole site clearance so the developer can start with a clean slate. But this may mean that historic character is destroyed and that what replaces it resembles any place, anywhere.

8.2 We, as a nation, certainly maximise the potential of the most famous sites; Heritage is “the main motivation of 30 per cent of all international visits to the UK” (Chairman of the Art Fund, Art Quarterly

Autumn 2015). Organisations such as English Heritage and the National Trust take great care of their heritage assets because they have to answer to their members and local communities. However most individual private owners struggle to maintain less well-known historic properties and landscapes.

8.3 Historic assets covered by formal designations such as listed buildings, scheduled monuments and registered parks and gardens, are protected from damage by the need to apply for listed building, or scheduled monument, consent. Unfortunately local authorities subjected to severe budget cuts often have insufficient resource to take action when neglect/damage result in the loss of heritage assets, and have few suitably qualified staff available to deal with proposals for their development. Historic properties are being sold off as too costly to maintain, and new owners and developers then put forward ambitious plans for the modernisation of heritage assets, to local authorities that have insufficient resources to advise and inform and to require the owner to adopt a sensitive approach. In order to make more of these national assets, we suggest the following ought to be considered:

- Government should be willing to pay to protect the heritage we value. Public sector cuts mean that English Heritage can only get involved with projects impacting on the most important Grade I, Grade II* listed buildings and scheduled monuments (the majority of designated assets, both buildings and landscapes in England and Wales, are Grade II). Heritage assets that are lost can never be replaced;
- Local authorities responsible for protecting historic landscapes designated as National Parks and AONBS have a statutory obligation to adopt and implement management plans for their future planning and conservation. This should be imposed on all local authorities for designated Conservation Areas; and
- Historic England published useful guidance to support the historic environment policies in NPPF. Unfortunately the government appear to be intent on archiving documents such as these. Therefore their 'informal' status can be undermined at planning inquiries. This approach should be revoked.

Questions 9 and 10: Skills and design

9.1 The landscape profession is holistic. It is trained to understand the action and interaction of natural and human systems in a particular locality, and respond to these with plans and designs to secure the optimum outcome for society, the environment and the economy. However there is now a worrying lack of landscape expertise in both local authorities and Government departments and agencies, exacerbated by recent public sector cuts. This cannot have anything other than a negative impact on standards in the built environment as there are fewer officers with the necessary experience and knowledge.

9.2 Cuts and the non-statutory status of landscape are resulting in a loss of skills and capacity in local authorities, mainly through non-replacement of staff. How to address this deficiency is a challenge given the current focus on reducing public spending, coupled with the removal of 'red tape'. While unlikely to gain Government support, addressing this might require landscape to be put on a similar statutory footing as ecology and trees, requiring job descriptions that demand professional accreditation for holistic approaches. Failing that, local authorities and the developer community need to act as 'intelligent clients' and demand more from interventions in the built environment through a landscape-led approach.

9.3 To support this it would be desirable if elected members received training on matters relating to the built environment in order to make informed judgement and offer objective opinion. While we accept that the squeeze on the public purse continues to pressurise local authority spending, we would like to propose that a Head of Landscape Profession, located in the corporate centre of each local authority, to provide such guidance and to support the commissioning of private sector input in delivering landscape services.

10.1 The regional design review panels provide essential multidisciplinary input to project proposals. More commitment to the use of these panels by, for example, including the need for schemes to be brought to panels written into local plan design policies, could ensure this mechanism was more widespread. Often landscape, the setting of the building(s) and placemaking is a large part of the discussion at design review panels. They give an opportunity to take an overall design approach and provide design input from a range of experts. It is fundamental to have strong design policies in local plans. Support for local authorities which do not have these in place yet would be beneficial.

Questions 11 and 12: Community involvement and community impact

11.1 Decision makers and developers rarely consider adequately the way in which the built environment affects those who live and work within it. In our view, all parties (including residents and future occupiers) are generally unaware of the potential impacts of the built environment on health and wellbeing.

11.2 We have been working hard to promote to local authorities, elected members, developers and public health professionals the ways in which landscape and the built environment can be planned, designed and managed to improve public health and wellbeing. Our position statement, *Public health and landscape: Creating healthy places (2013)*^{viii} outlined our 'principles of a healthy place', informed by an evidence review, and designed to encourage greater consideration of landscape as a mechanism for improving public health. We were also commissioned by the Government Office for Science's Foresight team to write an essay exploring this theme in greater detail. More information can be found at the relevant endnote^{ix}.

12.1 Neighbourhood plans have enabled greater participation of local communities. Many include policies related to building character, scale, design details and materials. They allow the local community to impose additional, locally distinctive, layer of control over development proposals at the planning stage. However uptake to date has not been widespread^x meaning some local communities are not as engaged in shaping their built environment as they could be.

12.2 In areas not covered by neighbourhood plans, the local plans system and the planning applications process both include requirements for formal periods of public consultation. Local authorities undertake to consult; the quality of the response depends on the capacity of the residents to understand what is being asked of them. However the imposition by the Government of strict target periods within which planning decisions must be made (with sanctions imposed on 'failing' authorities) means that there is little time for negotiations to achieve quality planning decisions. Resources in local authorities so stretched that effective engagement over a period of time, leading to decisions that are supported by the community, is often curtailed.

12.3 If the main barriers to effective engagement are lack of time and resources within local authorities, leading to more officer stress, less willingness to listen and few opportunities to adapt and improve initial proposals, these barriers could be addressed by adequate funding for community engagement within local authorities.

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- ⁱ <http://www.theyworkforyou.com/lords/?id=2014-07-28a.1474.0&s=baroness+whitaker#g1486.0>
- ⁱⁱ <http://www.farrellreview.co.uk/downloads/The%20Farrell%20Review.pdf?t=1444127608>
- ⁱⁱⁱ House of Commons Communities and Local Government Select Committee (February 2011) Abolition of Regional Strategies: a planning vacuum. Second report of session 2010-11.
- ^{iv} <http://www.landscapeinstitute.org/policy/GreenInfrastructure.php>
- ^v https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/462472/ncc-natural-capital-gov-response-2015.pdf
- ^{vi} <https://www.gov.uk/government/publications/national-character-area-profiles-data-for-local-decision-making>
- ^{vii} Local Government Association (2010) New Housing Developments Survey, Local Government Group, London.
- ^{viii} <http://www.landscapeinstitute.org/policy/health.php>
- ^{ix} https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/444322/future-cities-green-infrastructure-health.pdf
- ^x <http://www.planningresource.co.uk/article/1212813/map-neighbourhood-plan-applications>
<https://www.london.gov.uk/media/assembly-press-releases/2014/11/too-much-red-tape-neighbourhood-plans-not-working-in-london>

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