
**Natural England: Strategic Direction Refresh Consultation, March 2008
Response of the Landscape Institute**

Introduction

The Landscape Institute is the Chartered Institute in the UK for landscape architects, incorporating designers, managers and scientists, concerned with enhancing and conserving the environment. The Landscape Institute promotes the highest standards in the practice of landscape planning, design, management and research, representing members in private practice, at all levels of government and government agencies and in academic institutions and commercial organisations.

We welcome the opportunity to respond formally to the Natural England Strategic Direction Refresh and are pleased that the working relations between the Institute and Natural England on a number of common areas of interest are developing well. We would like to thank Natural England for the engagement opportunities presented to us so far and look forward to further areas for participation in the future.

General comments on the Strategic Direction Refresh

The Landscape Institute is pleased that Natural England's Strategic Direction Refresh places importance on the concept of landscape, its character and distinctiveness and opportunities for conservation and enhancement. The Institute particularly endorses the preparation of an action plan for the implementation of the European Landscapes Convention. Furthermore we are extremely encouraged by the increasing recognition of green infrastructure, green spaces and their multi-functional nature.

We are understandably disappointed that the Institute is not named as one of the partners with whom Natural England will work. We hope this can be amended in light of what we consider to be constructive engagement in a number of common areas of interest.

We agree with the need for clear and inspiring language and assume it will be appropriately illustrated. The Landscape Institute is currently developing a photographic library and would willingly help provide illustrations if appropriate.

We hope we shall also be invited to comment on the Corporate Plan as we see the measurement of success of the Strategic Direction Refresh is in part a response to how it fits with the Corporate Plan, what budgets are provided to deliver the aspects identified in the Strategic Direction 2008-2013.

Specific comments on the Natural England's Strategic Direction 2008-2013

For ease of reference, the comments of the Landscape Institute are presented here in the order and under the headings as per the Strategic Direction 2008-2013 draft document.

Foreword

The third paragraph of this section infers that Natural England recognises its role in engaging with and advising government to ensure that development is achieved in ways "...which protect and enhance the natural environment and contribute to quality of life at national, regional and local level." The Landscape Institute welcomes this recognition and urges the need to fully appreciate landscape-scale approaches to development to ensure these outcomes are achieved.

Context

With regards paragraph one, the Landscape Institute wonders whether, in the phrase "Severe natural events such as water shortages, flooding and tidal surges...", the use of the word 'natural' is helpful, given the now widely accepted view that human-activities are contributing to the severity of such events and could also potentially undermine some of Natural England's objectives surrounding improving environmental awareness.

Additionally, the Landscape Institute wonders whether it might be helpful to include here explicit mention of the fundamental benefits that are derived from living near an open space (economic, health, recreation, community cohesion etc).

Strategic Direction

How we work

The Landscape Institute feels that paragraph four of this section is lacking in its failure to acknowledge the role of appropriate engagement with equivalent bodies in Scotland, Wales and Northern Ireland. Such engagement will be crucial if a truly integrated approach to the natural environment is to be achieved.

The final paragraph makes reference to working with people. In this and other more detailed aspects, the Landscape Institute considers it is important that Natural England's engagement is complementary to other community engagement work in order not to duplicate work done by others.

Outcome 1: A healthy natural environment – England's natural environment will be conserved and enhanced

Current situation

The Landscape Institute takes exception to the comment that "With notable exceptions, our more modern landscapes can be bland and poorly designed with little reference to local landscape character". Whilst we agree that there are some examples that fit this description, this point is unsubstantiated and has the potential to be misconstrued so as to imply that National Parks and AONBs represent good landscapes whereas modern urban landscapes generally do not. The Landscape Institute feels that this statement is both unfair and unhelpful. We feel that a more constructive approach would be to reference good practice guidance such as those produced by, for example, CABE and the North West Regional Assembly's North West Best Practice Design Guide.

We will work with:

In the first sentence of paragraph 1, we would like to see the inclusion of the term 'design' so that it is clear that the landscapes that people enjoy are not only a result of use and management but also design. This is presumably implicit as CABE is noted as one of the organisations with which Natural England aspires to work closely. Furthermore, we would like to see the Landscape Institute specifically mentioned as a key organisation here as our members play a critical role in the science, planning, design, implementation and management of landscapes. We also wonder whether there is a case for the inclusion of the Royal Town Planning Institute here.

Additionally, the Landscape Institute has an interest in the marine environment, particularly from the seascape perspective with impact assessment of off-shore developments being an area in which some of our members are involved.

Objective 1.1 – Our diverse landscapes continue to provide inspiration and enjoyment for people and enable our wildlife to adapt to the challenges of the future

What we will do and how we will do it

The Landscape Institute welcomes Natural England's recognition that all landscapes matter and also its acknowledgement of the importance of ensuring our landscapes are multi-functional.

The Landscape Institute appreciates that this document will be supported by both the State of the Natural Environment and also a Corporate Plan. However it is not altogether clear how "What we will do" is going to be achieved by "How we will do it" within the current draft of the Strategic Direction and we feel that greater clarity would ensure a far more robust document. For example, it is not immediately clear how the assertion that Natural England will "Advocate urban and urban fringe landscapes that are well designed and incorporate accessible green space" will be achieved through the bullet points which comprise the delivery focus. Good design of urban and urban fringe, in fact any space, is not only a matter of "incorporating landscape character" and we feel that close working relationships with the Landscape Institute will be invaluable to Natural England in assisting in the delivery of this area of work.

Five year measures of success

The Landscape Institute supports Natural England's proposed traffic light approach on all character areas and major development.

The measure for no net loss of landscape character refers to CQC. Some members of the Landscape Institute who were heavily involved with CQC in the Countryside Agency have the perception that this work has stopped since the formation of Natural England and the Institute is pleased to see its inclusion within the Strategic Direction and urges its continued use as a tool in this process.

Baseline monitoring is going to be very important in this and other success measurement. As previously mentioned, good design is not only about reflecting landscape character, therefore the monitoring proposals need to go beyond this.

Objective 1.2 – Our rich biodiversity thrives across the landscape, with ecosystems and habitats resilient to change

General comments

The Landscape Institute endorses the emphasis given to climate change in terms of ensuring resilience flexibility via appropriate adaptation measures. It is in this section particularly where we urge reference to engagement with adjacent nations; an 'England only' approach to species migration will not be successful.

Objective 1.3 – Our marine environment is better understood, valued and protected

The Institute's comments with regards to Objective 1.2 (above) are equally applicable here in terms of the marine environment and engagement with adjacent nations.

Outcome 2: Enjoyment of the Natural Environment – more people enjoying understanding and acting to improve the natural environment more often.

General comments

The Landscape Institute supports Natural England's community objectives. However we urge Natural England to ensure its engagement is complementary to that being undertaken through other agencies, not only to optimise resources but also to minimise consultation fatigue on the part of the communities in question.

There will be opportunities when it is appropriate for Natural England to take the lead as suggested but in places, Local Strategic Partnerships, local authorities, wildlife trusts etc will also have leadership roles. The Landscape Institute urges Natural England to focus on longevity of engagement and ensuring resources are available to remain committed to developing these community relations. We feel it important to make this point because initiatives such as the former Countryside Agency Parish Plans, market town health checks etc all run the risk of having mobilised and inspired engagement on environmental issues, only for funding and resources for continuing engagement to be pulled and/or not available from agencies responsible or being dependent on further funding applications.

We will work with:

The Landscape Institute feels it is important to point out that Groundwork Trusts also have considerable expertise in this area and that Local Strategic Partnerships will also have a role to play.

Objective 2.1 – People will have places to access and enjoy a high quality natural environment

Five year measures of success

The Landscape Institute considers that standards which will measure the quality of green space are highly important, in addition to ensuring that these spaces are accessible. Additionally, ensuring that green space is truly multi-functional is becoming increasingly important in addressing climate change issues and measures in this regard are encouraged by the Landscape Institute.

Objective 2.2 – People fully understand and value the contribution of the natural environment to our quality of life

General comments

The Landscape Institute is generally supportive of the content in this section of the draft Strategic Direction however would like to point out that there may be partners, other than Education Authorities, who could help promote opportunities for young people to experience and learn about the natural environment. Furthermore, we would like to add that we are wholly in favour of the need to ensure that young people are properly educated in issues affecting the natural environment and its protection and enhancement. Delivering on this objective would help greatly in securing a sustainable future, as per outcome 4 of the draft Strategic Direction.

How we will do it

The Landscape Institute urges Natural England to develop and maintain a strong evidence base relating health with the quality and accessibility of green space.

Objective 2.3 – People increasingly take action to protect and enhance the natural environment

The Landscape Institute feels it would be helpful if the Strategic Direction clarified whether or not 'action' referred to physical steps or if the term covers a broader definition.

Outcome 3: Sustainable use of the natural environment – the use and management of the environment is more sustainable

Objective 3.1 – Land is used for social and economic development in a way that recognises, protects and enhances the value of the natural environment

What we will do:

The Landscape Institute feels it might be more pragmatic to, rather than 'Advocate a planning system which includes planning for the future...', acknowledge a new planning system and find ways to work with that.

Outcome 4: A secure environmental future – decisions which collectively secure the future of the natural environment

General comments

A secure environmental future requires education at early ages to enable a true appreciate of its value and behaviours which will ensure its sustainability. The Landscape Institute feels that more emphasis needs to be placed on the importance ensuring that young people in particular understand, and are engaged with, the natural environment and sustainability as a key to ensure the long term achievement of outcome 4.

Current Situation

Paragraph one states that 'Future pressures for energy, housing, transport, food, space for water together with the impacts of climate change **may** require a more coherent and planned approach to balance demands'. The Landscape Institute feels that the word 'may' (highlighted here in bold) should be replaced with 'will'.

Objective 4.3 – The natural environment is resilient in the face of climate change

General comments

The Landscape Institute recommends that should the Planning Bill require an energy sector spatial plan then Natural England could engage with this process.

The Landscape Institute would like to thank Natural England for being given the opportunity to contribute to the Strategic Direction Refresh. For any queries relating to this response, or for future consultations, please contact:

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