

Natural England's "Future Landscapes" Consultation Response from the Wildlife and Countryside Link

March 2009

Wildlife and Countryside Link (Link) brings together 38 voluntary organisations concerned with the conservation and protection of wildlife and the countryside. Our members practice and advocate environmentally sensitive land management, and encourage respect for and enjoyment of natural landscapes and features, the historic environment and biodiversity. Taken together, our members have the support of over 8 million people in the UK.

Link welcomes the opportunity to respond to the consultation on Natural England's draft policy on landscape policy – '*Future Landscapes*.' As well as the importance of the intrinsic value of landscapes in the future, we believe that landscape-scale conservation or conservation at the landscape scale is an issue which should be closely related to Natural England's approach to the future of landscapes.

This response is supported by the following 9 member organisations;

- Campaign to Protect Rural England
- Campaign for National Parks
- Council of British Archaeology
- Friends of the Earth England
- Froglife
- The Grasslands Trust
- Plantlife International
- Pond Conservation
- Wildfowl & Wetlands Trust

1.0 Overview

Natural England was formed to bring together statutory advice to Government on landscape conservation, countryside recreation, wildlife conservation and sustainable farming. Through this policy document there is now an opportunity for Natural England to show how, in the longer term it intends to bring together these conservation objectives for biodiversity, aesthetic and cultural considerations, sustainable farming and recreation.

It is not clear whether the term landscape is used consistently in the document. As well as the concern for landscape conservation which is central to the statutory role of Natural England, landscape-scale conservation or conservation at the landscape scale is an issue which Link believes should be central to Natural England's suite of landscape policies. The paper also needs to be defined more clearly, and the terminology used throughout this policy does not in every instance help provide clarity around some already complex terms and their inter-relations. In particular, does 'landscape-scale conservation' only apply to the biodiversity present in landscapes or does it encompass a broader range of issues including biodiversity conservation, cultural and historic factors and the communities that shape those landscapes?

2.0 Key Issues

The policy document identifies three new key issues that will contribute to shaping the future of English landscapes: climate change, the value placed on ecosystem goods and services and biodiversity conservation at the landscape scale.

Link welcomes the recognition of the different ways climate change will affect our landscapes and of the different areas of uncertainty about the nature of these effects. There is no question that climate change is likely to have a profound effect on the landscape, its biodiversity and land-use, as well as its aesthetic and historic context.

The consultation document needs to give more emphasis to all the main drivers of change in the landscape:

- Intensive agriculture
- Intensive forestry
- Urban development
- Industrial development
- Mineral extraction
- Energy production and transmission
- Mass transport
- Recreational activities

These will be the main drivers of change in the landscape in the foreseeable future so their effects on landscape must be considered in this policy document.

Further, any shift towards the application of the Ecosystems Goods and Services approach to evaluating landscapes will need to take into account the fact that these drivers of change are themselves driven by economic considerations, which we consider are out of step with a sustainable development approach. Equally, the adoption of a landscape-scale approach to conservation, whether that is conservation of biodiversity, the historic/built environment or 'natural beauty' will need to be planned in a way that is not dominated by the activities associated with these drivers of change. The intrinsic value of landscapes should be central to Natural England's policy paper.

Natural England could explicitly state within this policy document that the Ecosystems Goods and Services approach to valuing the functions that landscapes supply to society is not the only way to evaluate landscapes and their components. A flood storage area supporting intensively managed improved grassland can provide as good flood storage as a flood meadow supporting an abundance of different wildlife, archaeology and recreational value. Natural England should state quite clearly that landscapes and their components have intrinsic value of equal and arguably even greater importance than the mere economic value of the services they provide. That is not to say that placing economic value is unwelcome, just that it should not be adopted as the main consideration of value and purpose.

It is not clear from the consultation document how Natural England will apply these policies, what sort of actions will be derived from these policies, how Natural England will monitor how effective these policies are and what it will do to review and integrate them with Natural England's other policies. This leaves the policy with little grounding and so some text detailing how this policy could be applied or advocated would be very useful, in particular, more text relating to its work on valuing ecosystems, scenarios work, and an overarching Vision for the natural environment.

Another key issue relates to how little articulation is given to the relationship between future landscapes and the functioning or future state of wetlands and the water environment. This is a considerable omission to be addressed in any serious attempt at landscape planning – many of the future drivers for landscape change or protection are likely to be in consequence to future changes or delivery in water policy. We would recommend that the views and advice of professionals working within water and wetland conservation are incorporated in the next draft of this policy.

3.0 Comments on Specific Policies

3.1 Policy 1

Link accepts that landscapes are dynamic. But Natural England has a leading role in shaping how English landscapes will change in the future and there is a need for Natural England to have an overarching vision for future landscapes and to establish policies which have a clear direction. The very reason some landscapes are so biodiverse or culturally valuable may relate to a certain level of ongoing social or environmental stability – this policy should express this, otherwise we may cultivate a fashion for change at any cost.

The notion that ‘change is a fundamental characteristic of landscapes’ is a myth – as pointed out by Oliver Rackham - this policy offers a unique opportunity to embed this understanding. The notion that intervention is required in all cases to ensure desirable outcomes within and across landscapes for the benefit of society, wildlife etc, is also unhelpful. There may be a need to be proactive but in many cases, provided beneficial drivers persist, there may be no need to do anything other than monitor condition. This would dispel the idea emerging from the draft policy that Natural England wishes to tweak every aspect of the countryside and acknowledges that some landscapes can ‘take care’ of themselves.

Link believes that adopting a landscape-scale approach to all of Natural England’s work will help translate that vision into action for positive change in England’s landscapes. To achieve this, Natural England will need to bring together its currently disconnected expertise on biodiversity, natural beauty, sustainable recreation and sustainable agriculture, into a holistic organisation where these existing barriers are broken down. This will be necessary if Natural England is, in turn, to successfully influence other stakeholders such as land owners and other statutory agencies.

3.2 Policy 2

While the Landscape Character approach has been successful in evaluating landscape based on aesthetic and historic aspects, it could take into account the important biodiversity components of the landscape to a far greater extent than is currently the case. All too often landscape character ignores the biodiversity missing from the landscape because either the landscape character baselines have been set after those landscapes had already lost their main biodiversity components or they do not consider the full suite of biological datasets that exist.

Landscape Character Assessments (LCA) need to incorporate a deeper understanding of the landscape changes required to achieve positive landscape-scale change for biodiversity, historic, aesthetic and sustainable recreational use. Whilst LCA is a useful tool, it needs to be associated with a clear policy framework and targeted application. The pre-eminent purpose of this policy paper is to establish how future change in landscape quality and character should be steered by Natural

England. There will often be other tools which better describe how to either maximise the biodiversity value of any given landscape to meet biodiversity targets, or describe how best to maximise the value derived from more functioning ecosystems. If the vision is to deliver more of either of these two, then LCA will not be the most useful tool. For example, the Important Areas for Ponds process identifies areas of landscape which have important ponds for biodiversity – these could not be predefined using landscape characterisation which did not take account of the quantity and quality of ponds, though there is sometimes a match between recognised human landscapes and important areas for ponds.

3.3 Policy 3

Link has found it difficult to understand the purpose of this policy. It is a reiteration of other policies using different words which confuses the reader. The essence of this policy could easily be incorporated into Policy 1.

3.4 Policy 4

Natural England needs to have its own vision of the future landscapes of England and therefore Policy 4 is incorrect in suggesting that Natural England's vision is one that must be agreed with all the major stakeholders. Such a vision will be anodyne at best given the likely conflicting views of what landscapes should look like or what functions they should carry out, let alone accounting for the different terminologies and understandings in place of what a Vision is.

For example, a landscape-scale approach to conserving English landscapes is at odds, at least in some geographical regions of England, with the vision of future England derived from intensive land-use, whether that be intensive agriculture, dense urban development or large-scale mineral extraction. The role of Natural England is to provide leadership in identifying and communicating how the needs of the environment should best be protected and enhanced in the future, in line with its remit. Visions can only ever be rigorously informed by stakeholders and there are many stakeholders who could, in the future, cause large-scale landscape change wholly out of step with promoting the natural environment – this is what needs to be safeguarded against or influenced to mutual benefit.

3.4 Policy 5

Whilst multifunctionality is a desirable quality and all landscapes are multifunctional to one extent or another, not every landscape should *have to* be multifunctional or indeed planned or manipulated. A key element of a landscape-scale approach to conservation is the identification of those landscapes where there is the greatest chance, or just a realistic chance, of achieving conservation success for key components of the landscape. This may mean that other Ecosystem Goods and Services and other land-uses, are given a lower priority within certain landscapes.

Conversely some landscapes, as is already the case, are dominated to such an extent by intensive land-uses that it is not economically or ecologically feasible to consider them for landscape-scale conservation approaches. Often, the needs of a species or suite of habitats to adapt to climate change may necessitate a significant change in the landscape if biodiversity is to be maintained and enhanced. This may result in landscapes where the need to be 'multifunctional' is reduced or one dominant function is replaced by another.

For example, ponds are very widely used in delivering water ecosystem services – indeed, they are one of the most widely used methods: road balancing ponds, SUDS, fish ponds, duck shooting, nutrient interception ponds and wetlands, farm storage

reservoirs, and ponds for wildlife. Well functioning ecosystem services ponds are a good thing but suggesting that all such ponds provide biodiversity benefits is not strictly true. This is also the case for many other habitats where managing or optimising them for their potential ecosystem services will often be at odds with the objective to deliver for biodiversity. There are many instances where optimal ecosystem services value is the same as optimal value for biodiversity but where this is not the case distinctions need to be made and well communicated.

3.5 Policy 6

Link welcomes any structured attempt to better understand what motivates people about the landscape they live in and we wish to see a more informed and inclusive debate emerge. This should not however delay measures to protect or advocate for change in the landscape where this is urgently necessary. As well as promoting the integrity of landscape character and the protection of our finest landscapes, a landscape scale approach could accommodate securing the future of wildlife in a changing climate, or promoting land-use change where this can secure carbon, for example.

**Wildlife and Countryside Link
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