



Forestry Commission
England

Ms Kate Barker

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Dear Ms Barker

BARKER REVIEW OF LAND USE PLANNING

Thank you for your letter to the Forestry Commission's Director General, Tim Rollinson, inviting the Forestry Commission to comment on your review of land use policy. As your review is specifically focussed on England, I have been asked to respond directly on his behalf.

We welcome the opportunity to contribute to this important work. In doing so, we strongly support the principle of a balanced approach to land use planning that fully recognises environmental and social issues alongside and in support of economic ones. To this end, we see a need to ensure that the role of strategic green space is recognised as a fully integral part of the planning process.

More detailed background to our policy context and priorities follow overleaf, as does our response to the specific questions posed in your consultation paper. However if there are further questions or issues you wish to raise with us, please do not hesitate to contact me.

Yours sincerely

Gareth Price
Programme Manager
Urban Regeneration and Development
21st March 2006



BARKER REVIEW OF LAND USE PLANNING

Background

1. The Forestry Commission is a non-ministerial government department reporting to the Secretary of State for Environment and Rural Affairs which is responsible for advising on and delivering woodland and forestry policy. The precise current role for woodlands we see as being determined primarily by Defra and ODPM through the Rural Strategy and the Sustainable Communities Plan.
2. In the context of Sustainable Communities our focus is on:
 - delivering large scale and high quality public green space within priority areas;
 - supporting the sustainable construction agenda by advising on the potential role of timber and fostering the supply of home-grown timber from sustainably managed woodlands.
3. Government policies and priorities for woodlands and forestry are currently set out in the England Forestry Strategy, published in 1998. The Strategy is based on four programmes;
 - Rural Development;
 - Economic Regeneration;
 - Recreation, Access and Tourism;
 - Environment and Conservation.

Issues relating to land use planning fall mainly within the Economic Regeneration programme. This includes the contribution of trees and woodlands to restoring former industrial land, enhancing local environments and creating green settings for future development. The ODPM's Growth Areas and housing market renewal pathfinders are strategic priorities for the Forestry Commission in the development and delivery of this programme.

4. Defra are currently reviewing the England Forestry Strategy and a revised version is expected later this year. In the revision it is anticipated that "green infrastructure" will feature as a major theme and provide a valuable basis for further integrating the role of woodlands and forests within the urban environment. In this context, the Commission very much welcomes the recent publication of the National Audit Office report for ODPM on "Enhancing Urban Green Space" (March 2006), which unequivocally recognises that "Good quality greens space plays a vital role in enhancing the quality of urban life and to the achievement of a range of Government objectives".
5. The Commission's research agency Forest Research, provides advice and expertise in support of the urban green space agenda and contributes to the development of the social, environmental and economic evidence base for this work.

Woodland and Green Infrastructure

6. The following draws from a topic paper prepared on behalf of Defra for the England Forestry Strategy review process and provides a helpful context for the role of woodland within the land use planning system.

- *What characterises “good” Green Infrastructure?*

Evidence suggests that good Green Infrastructure can be characterised by the following (although the list is by no means exhaustive): strategic, connected, multifunctional, integrated with other land uses, diverse, attractive, accessible, well managed, well used.

In fulfilling these characteristics it has the potential to deliver the following services to society: environmental/social/economic or functional/amenity/personal - an integrated & sustainable urban ecology - a reservoir of natural capital.

In the same context a lack of good Green Infrastructure may imply: fragmentation, urban dysfunction, lack of cohesion, lack of opportunity, poor image, and low self-esteem. (eg One North East highlighted the possession of 'an exceptionally good natural environment' as one of the key characteristics of a successful region, NWDA recognise the contribution of quality greenspace in terms of regeneration and quality of life objectives – *NWDA draft Regional Economic Strategy 2005*).

- *Trees and woodlands as a part Green Infrastructure*

Trees and woodlands are a key component of Green Infrastructure and can bring specific advantages. These include – robustness, cost effectiveness, an ability to create attractive settings, three dimensional nature, “natural”, long lasting, high “carrying capacity”, richness in bio-diversity, more multi-functional than many other types of green space, a renewable source of energy and localised climate moderation – including shade from UV rays.

- 7. The Commission therefore fully supports the notion that Green Infrastructure should be considered as a fundamental part of land use planning policy**

Comments specific to the Barker review

8. The following provides our response to those questions posed as part of the review process.

Overall: As we have already stated, The Commission have a key interest in strategic green infrastructure and currently have an important role in the provision of green infrastructure in support of ODPM's Sustainable Communities Plan. In this context we would recommend that The Barker Review includes additional provision for the assessment of the multiple use of land (i.e. social, economic, environmental). The multiple use of land underpins the Forestry Commission's ethos. If the Barker Review is not the appropriate means of assessing

environmental and social issues in land use planning beyond economic development then we see it as being essential that the successes and failures of planning in addressing these fundamental areas is reviewed elsewhere and given equal weighting.

The call for evidence sets out ‘getting the balance right’ as an issue for analysis. This should be reviewed in the context of rapid and widespread change, in addition to pressures on land use.

Question 1.

We believe criteria based policy and local discretion are essential in delivering flexibility in the planning system. Further assessment of resource and infrastructure requirements would aid the planning system in delivering the right development in the right place (including green infrastructure requirements).

Question 2.

The scope of plans at the different spatial levels could be improved through further integration of issues and additional integration with other plans (such as woodland strategies and forest frameworks at the national and regional level). We believe that in this context, the planning system should be allowed the time to consolidate prior to the introduction of further changes. Devolution to the regional level provides the right strategic approach and fits well with the delivery structure of the Forestry Commission in England.

Question 3.

The sustainability ethos set out within PPS1 provides a sound basis for the integration of social, economic and environmental issues. These areas should not be considered in isolation and development should be led by environmental and social elements in addition to economic issues. We believe the review currently places too little emphasis on environmental and social issues.

Question 4.

The Dutch planning system provides a good model for addressing social and environmental issues. Green infrastructure is considered to be an essential element of strategic planning for growth in the Netherlands.

Question 5.

We believe that the emphasis of the revised planning system on the speed of decisions has led to deterioration in the quality of decisions. Clear standards for sustainability would provide developers with increased certainty; consistent use of sustainability standards would provide transparency. Forestry and environmental land uses should be integrated into economic masterplanning but are too often long term elements. The Local Development Framework Cycle, although it is more flexible than its predecessor as it can be updated more regularly, must make provision for long term development strategies that could involve on going phases of development beyond the plan period. This requires long-term investor confidence based upon some assurances that allocation would be made to consider green and other infrastructure. Only by adopting this

'horizon' approach can effective integrated land use strategies be developed in urban fringe settings.

Question 6.

We believe there is an opportunity for the planning system to be better integrated with DEFRA policy and the policies within the England Forestry Strategy and associated regional woodland strategies.

Question 7.

Speed should not be the emphasis of the planning system; there must be time for meaningful consultation. However measures to reduce delays could include clearer guidance for developers on what is required and what is likely to be permitted (e.g. standards for green space).

Question 8.

The streamlining of information requirements could be related to development standards and further guidance for developers on what is required. This would reduce requests for additional information after an application has been submitted. Pre application negotiations can also lead to the streamlining of information requirements.

Question 9.

The high cost of occupation is due to a combination of factors and is not solely due to planning constraints. It is difficult to acquire sites in areas allocated for development due to the hope value attached to the land. This is particularly problematic in providing uses with a high land take, such as green infrastructure.

Question 10.

It is important that the planning system should create a level playing field. Measures to influence competition should not have a negative impact on environmental and social factors and should have a positive impact where possible (e.g. mitigation of environmental costs through pricing mechanisms).

Question 11.

Clustering economic development has a positive impact in sustainability terms, however, enabling policies for rural enterprises, such as forestry and farming, are equally vital.

Question 12.

Additional communication and joint working between government departments, agencies and within Local Authorities could aid in optimising resources. Economic development officers should work closely with planning officers where necessary. More public/private partnerships for long term masterplanning would be useful.

Question 13.

We would encourage Local Planning Authorities to target the key stakeholders in proposals for development to ensure that they are aware of opportunities to comment and provide input and advice. Government agencies that are non statutory consultees should be informed of applications that impact on their remit (e.g. the Forestry Commission should be informed by Local Authorities when applications are submitted with a significant impact on woodlands and to identify where green infrastructure could have a significant role).

Question 14.

We believe that the interests of the wider community can be better represented through the involvement of strategic authorities, such as the Forestry Commission.

Question 15.

There is a considerable evidence base to demonstrate that an enhanced local environment can have a significantly positive impact on economic development. Regeneration initiatives should be supported by the provision of an appropriate network of green infrastructure.

