

Dr Carolyn Cobbold, Project Leader, Manhood Peninsula Partnership – Written Evidence (LUE0019)

Dr Cobbold has been involved in spatial planning as project leader for the Manhood Peninsula Partnership since 2001. Prior to that she worked in the risk management/insurance sector, including analysing/investigating the impact of climate change. She has an engineering degree and MSc from Imperial College and a Phd from Cambridge University. She has just completed a Research Fellowship at Clare Hall, Cambridge and was awarded an RSA Fellowship for her work on planning for climate change and community engagement.

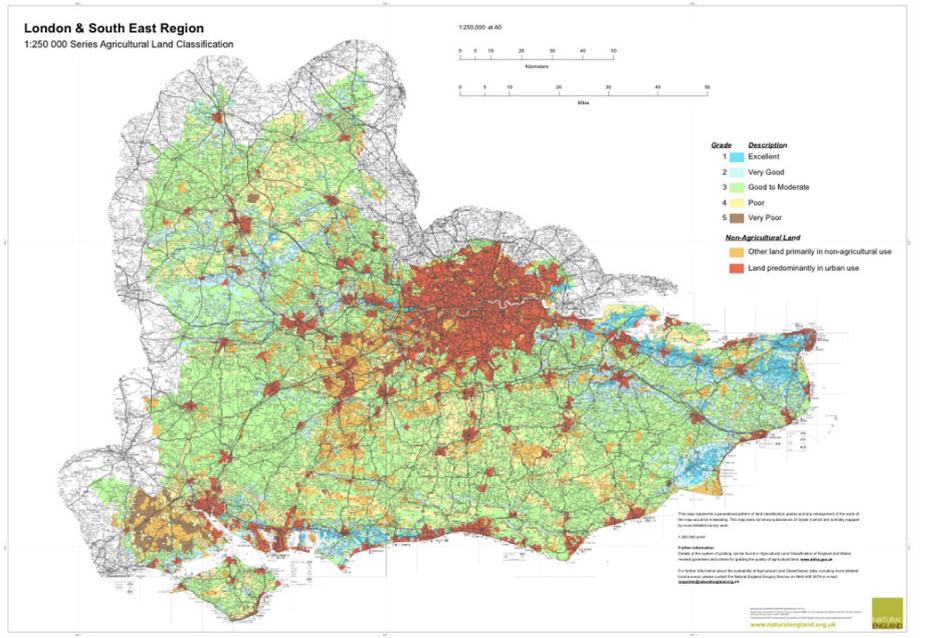
Pressures and Challenges

1. There is an acute imbalance as to which areas of land are protected, and why, under the UK planning system. Biodiversity, safety from flood risk, food security, affordable and flexible housing should be recognised within the planning system to the same degree as landscape quality. The lack of value currently ascribed to these critical issues is unsustainable and fails to recognise the risks of climate change and significant geopolitical shifts. The largest areas of land in Britain which are protected from development are its National Parks and Areas of Outstanding Natural Beauty. They are protected primarily for their landscape value, a subjective based criteria based on the bucolic, romantic based landscapes much favoured in the 19th century. For more than a century this has privileged Britain's uplands over its lowlands, with the Norfolk Broads the notable exception among Britain's 15 National Parks. The privileging of certain landscape values in planning means that flat land has become favoured for development. While this suits developers, it ignores the risks and opportunities of Britain's flat lowlands, leading to a loss of important biodiversity and agricultural land. Increased building on low lying flat land is also creating an unsustainable exposure to catastrophic flood risk in the UK, particularly in coastal areas. Meanwhile, lack of affordable homes in protected areas is creating a lack of sustainable communities within large, protected areas of the UK.
2. The key long-term driver of land use change that needs to be planned for is climate change as this directly or indirectly impacts many of the other land use drivers including flood mitigation; biodiversity; food security; water resource and drainage; and population change. Lack of housing affordability and flexibility is also

- a growing concern. The government's main solution to the unaffordability of housing is a market-based supply and demand approach based primarily on private ownership. This has led to higher government housing targets for areas with higher property prices, a simplistic approach which fails to recognise local conditions. Prices for homes in central London or in coastal areas, for example, are unlikely to reduce substantially with more building. For areas such as these a different approach is required to provide affordable homes for local people. A system like the rural exception site policy used in Britain's National Parks could be adapted for expensive coastal/holiday and city centre locations. Housing numbers in oversubscribed/popular areas should be determined on a need rather than want basis. The presumption in favour of development has had the unintended consequence of forcing up land prices in areas of high demand for housing (whether for primary or holiday/second homes). This has at least three negative consequences. Firstly, the rising cost of land, often the largest single contributor to the cost of a home, is continuing to reduce housing affordability. Secondly, landowners earn more for their land by selling it for development than by running a successful farm or business on it, adversely impacting the local and national economy. Thirdly, developers increasingly are in control of both land supply and the type of housing that is built, particularly in highly constrained areas where authorities unable to prepare a local plan.
3. A more integrated and long-term planning approach is required nationally, regionally, and locally. Rather than focussing primarily on landscape criteria and centrally imposed housing algorithms, spatial planning should apply adequate weight to water management, employment, transport infrastructure and other catchment-based criteria. Planning partnerships between residents, businesses, landowners, statutory bodies, utility providers and planning authorities should be set up to develop long term strategies for catchment areas. This is an effective approach for highly constrained areas and those likely to be severely impacted by climate change such as low-lying coastal areas. A successful example of such a partnership is the Manhood Peninsula Partnership see <https://peninsulapartnership.org.uk>

Farming and land management

4. Britain's most productive land for arable farming and horticulture is not protected for its landscape (ie lies outside of AONBs and National Parks). As a result, much of Britain's highest quality agricultural land is being sold for development as land prices outside of protected areas greatly exceed agricultural values. This increasing trend is particularly evident in the south east of England where the most productive farm and horticultural land is located on the low lying coastal plains of Chichester, West Sussex and Kent. (Shown in Blue on the Defra/Natural England map below). Horticultural and agricultural growers in these areas also benefit from the best climate and longest sunshine hours in the UK allowing them to produce food more efficiently and many have already adopted lower carbon, highly technological farming techniques. However, high land prices and developer interest is resulting in high quality, sustainable food growing being replaced by inappropriately and unsustainably located housing. Agricultural land prices on West Sussex and Kent's fertile and lowlying coastal plain have risen steeply in recent years because demand for coastal housing and high property prices has led to high government housing quotas and because higher land across both counties is protected by National Park and AONB landscape designations. Continued building on excellent quality farmland will not materially reduce house prices in these areas, as demand for housing will always be high on the south coast. However, continued building on the coastal plain will materially diminish/eradicate the amount of high-quality farmland in the south east of England. As can be seen from the map these areas are also geographic cul de sacs, so will always provide reduced opportunities for residents to access schools, work, training, facilities etc. These low-lying coastal areas will be impacted by rising sea levels and surface water/ground water flooding in future decades, making them unsustainable locations for building new homes and creating huge financial risks and obligations on future generations. Maintaining these areas as farmland and allowing parts of them to adapt to wetlands, increasing biodiversity, tourism appeal and flood mitigation, would be a much more sustainable approach to land management and increase the climate change resilience of the existing communities in these coastal areas.



Source DEFRA/Natural England

5. Some unintended consequences of Environmental Land Management Schemes are becoming apparent. The schemes are much harder for small, independent farmers and landowners to access and favour certain ecosystems, such as woodland where environmental codes have already been established. This could lead to a growth of large landowners and reduced biodiversity, if not managed well.

Nature, landscape and biodiversity

6. A comprehensive approach to biodiversity needs to be taken in planning land use. Despite an abundance of National Parks and AONBs Britain has one of the worst records globally for biodiversity. This is because our protected areas are based primarily on landscape criteria and not biodiversity. It is also because we privilege certain ecosystems above others. Wetland is one of the world's most important and diverse habitats and ecosystems and one of the best at capturing carbon. However, it is also one of the fastest disappearing habitats on earth and in Britain. This is partly because lowlands are not privileged in our landscape-based planning system and because wetland carbon codes have not yet been developed. Biodiversity and nature are increasingly becoming 'gated' in Britain and removed from the lived experience of most UK residents, with nature confined to AONBs and National and Local Parks, and nature reserves. For fauna and flora to flourish it needs access across all

parts Britain and needs to be appreciated by humans, who are the main agents able to help it survive manmade and natural threats. While the creation of wildlife corridors and biodiversity offset is considered a step forward, the unintended consequences of further gating nature and removing it from the areas where most people live needs to be considered.

7. Nature based solutions are being recognised as a sustainable approach to some of Britain's key infrastructure problems, particularly its potential to improve drainage, water resource, flood mitigation and management and pollution. Making more land available for the creation of wetlands, areas that can be flooded from time to time, etc will be hugely beneficial for biodiversity and bringing back nature into people's lives and neighbourhoods. However, creating more space for wetlands is being handicapped on several fronts. Woodland Codes for Carbon Capture have been developed ahead of Wetland Codes, encouraging farmland that cannot be converted into housing to be wooded over rather than used for farming or the creation of wetlands. Low lying flat plains where wetland creation is most appropriate and needed, especially coastal hinterland, is favoured by developers and seldom protected by planning forcing up land prices and hindering wetland expansion. Space for nature and biodiversity such as wildlife corridors and buffer zones should be included in all Local Plans. Where developments are given the go-ahead in areas where Local Plans are not in place, requirements for biodiversity should be included within a development site or in the immediate vicinity of the site. The ability for developers to offset biodiversity provision should be managed carefully to prevent further 'ghettoization' of nature and biodiversity in the UK.

Environment, climate change, energy and infrastructure

8. Long term and integrated spatial planning are key to ensuring greater resilience. Climate change and geopolitical ruptures will happen over the next century, that is certain. The degree and specificity of the change is impossible to predict. It is paramount that the planning system and statutory bodies adopt a more flexible and precautionary approach to land use planning. There is a danger that easy wins will be prioritised in the 25 year environment plan and that subjective criteria such as landscape qualities will continue to be privileged over increasingly critical issues such as flood mitigation and climate change impact on communities. The UK government response to climate change, whether through its 25 year environment plan or net zero targets, is not sufficiently addressing the critical climate change impacts that will be felt in the

coming decades by vulnerable areas and communities. The future of Britain's coastal lowland is of particular concern due to biodiversity and food growing loss in these areas caused by the planning system; severe infrastructure deficits caused by unsustainable housing growth and exacerbated by cul-de-sac geography; and future catastrophic flood risk. Areas and communities that face critical climate change scenarios, such as low-lying coastal hinterlands, should be supported to plan ahead and adopt integrated, long term planning strategies. While this is being attempted by local residents and authorities in some locations (see www.peninsulapartnership.co.uk) national planning legislation, government housing mandates and initiatives such as the 25 year environment plan provide inadequate support for, and even conflict with, local attempts to future-proof areas.

9. Land use pressures vary across the country often due to the skewed impact of landscape protections forcing huge pressure on small areas, such as the coastal plain of West Sussex, for example. A rebalancing of planning priorities is needed to ensure that the most appropriate land for infrastructure, energy, food production, biodiversity and housing is identified as part of an integrated and long-term planning approach.

Land use planning

10. The UK is fortunate to have had a formal evidence based national planning system operating on a local basis for over a hundred years. This has largely served the country well. However, competing land pressures and external issues such as climate change and geopolitical uncertainty requires a review of national planning and a rebalancing of resources. National guidance for resilience is often not supported by national planning legislation. This is particularly the case in flood mitigation and management. The Environment Agency's 2020 Flood and Coastal Erosion Risk Management Strategy seeks to better prepare the UK for rising global temperatures but much of its advice continues to be dismissed by developers, local authorities and even the EA itself as flood risk is not adequately prioritised in the National Planning Policy Framework and other planning legislation. While the EA can object to development in land at immediate threat from rivers and the sea (Flood Zone 3), other forms of flood risk – groundwater, surface water and future tidal risk are inadequately accounted for in the planning system. As a result, the EA is reluctant to object to building on land outside of Flood Zone 3, even when flooding can be proven by locals. Meanwhile,

local authorities often will not object to planning if the EA has not objected. This is an unsustainable situation. The value of land for flood mitigation/water storage; biodiversity and food production should be better recognised in the UK planning system to future-proof Britain and ensure maximum resilience for future generations. The current presumption in favour of development, which is at the heart of the British planning system, needs to be reviewed and tempered to ensure adequate space/room/land is made for water, nature, and food production. The UK planning system and housing allocations should take better regard of local geography, local priorities and local knowledge relating to infrastructure, population, demography, flood risk and biodiversity. There is an assumption that all house building provides jobs and improves a local economy. This is not the case in all areas, particularly coastal areas in which environmental tourism and food growing are key economic and employment sectors and where residents can only commute in one direction for work, schooling, training, medical care etc. The increasing difficulty of preparing Local Plans in areas with the most constraints is resulting in opportunistic and inappropriate development being granted while Local Plans are out of date or under review. This further decreases the ability to produce a sustainable, long term plan in the very areas that most need long term, integrated planning. Local democracy in planning is diminishing and local input cannot counter the resources at the disposal of developers. Local authorities are finding it increasingly difficult to strategically plan land use management. They lack resources and expertise and without a Local Plan in place, presumption in favour of development always favours the applicant looking to develop land, even if there are better long term uses for that land (such as farming, business, biodiversity or flood mitigation). Local authorities will not object to inappropriate planning applications without support from other statutory authorities. Water companies cannot legally reject applications even in areas where drainage is inadequate. The Environment Agency's ability to reject on flooding grounds is limited. The Highways Authorities (national and county) often have limited knowledge of local traffic conditions. Many areas are suffering from worsening infrastructure deficit, whether drainage, transport, water quality. There is a tendency to fund this deficit through developer contribution but this requires land to be used for housing further reducing opportunities to provide land for infrastructure solutions. For example, drainage and flood management solutions are often best met by providing more land for water capture.

11. Rather than focussing primarily on landscape criteria and centrally determined housing numbers, spatial planning should be based equally on drainage, water resource, biodiversity, food production, employment, transport infrastructure, zero carbon and other wider catchment criteria. Planning partnerships between residents, businesses, landowners, statutory bodies, utility providers and planning authorities should develop long term strategies for catchment areas. This is a particularly effective approach for highly constrained areas and those likely to be highly impacted by climate change such as low-lying coastal areas. A successful example of this approach is Integrated Coastal Zone Management. See <https://peninsulapartnership.org.uk> for an example of such a partnership and ICZM.

Conclusion

A more integrated and long-term planning approach is required nationally, regionally, and locally, with greater recognition of the importance of biodiversity, safety from flood risk, food security, affordable and flexible housing. The principle of a Local Plan is an effective and tested approach. However, Local Authorities are finding it increasingly difficult to complete and update Local Plans and without such plans in place it is very hard to resist inappropriate and opportunistic planning applications. Recent shifts in planning legislation in favour of development and government-mandated housing numbers designed to address unaffordability through a simplistic supply and demand home ownership approach means that land use is determined increasingly by developers who have access to large financial resources and can buy in the best lawyers and 'expert' witnesses. The UK planning system does not need replacing but needs reforming to meet the challenges of the 21st century, with a greater emphasis on integrated, long-term, resilient and flexible planning.

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