



Glover Review of Designated Landscapes

Response by the National Trust to the Glover Review's Call for Evidence

18 December 2018

The National Trust is a charity founded in 1895 by three people who saw the importance of our nation's heritage and open spaces and wanted to preserve them for everyone to enjoy. More than 120 years later, these values are still at the heart of everything we do. We look after special places throughout England, Wales and Northern Ireland for ever, for everyone. 45% of Trust land lies within National Parks and 27% lies within AONBs. These areas are home to 2.3 million people, including National Trust tenants, and visited by more than 260 million people every year.

Executive Summary

Designated Landscapes are hugely valuable assets for the public. They represent some of our most treasured landscapes and provide unique opportunities for people to explore places of great beauty and significance. They are also places that offer huge potential for the restoration and protection of our natural environment at a time when it has never been more under pressure. This review of designated landscapes is therefore a critical opportunity to reflect on the successes and challenges of these places and look to how we can get the best out of them now and for future generations.

Our response to this consultation responds to a wide ranging series of questions posed by the review panel. This summary highlights the key points that we hope are reflected throughout these responses.

The state of the environment needs to improve

More focus and priority needs to be given to improving biodiversity and habitat creation or restoration within designated landscapes. National Parks and AONBs both need to have a clear vision for what needs to be achieved for nature, and set priority against delivery. They also need to take more of a landscape-level approach, considering both ecosystem level issues for the natural environment, but also the historic and cultural elements of landscape. Stronger Management Plans with better information, monitoring and review could play a part in delivering this.

Land Management policy and the Environmental Land Management scheme arising from the Government's post-Brexit agricultural policy will be relevant – Parks and AONBs could be at the forefront of testing and delivering this scheme. It would be helpful to have a clearer understanding of the crucial role that National Parks and AONBs should be playing in relation to delivering the Government's 25 Year Environment Plan, and how they will support delivery of other initiatives like Nature Recovery Networks.

The Sandford principle¹ is key to helping National Parks balance the duty of conservation against their purpose to support recreation. The National Trust would support a strengthened duty in respect of conservation and an extension of the Sandford principle to AONBs.

Protections for designated landscapes in the planning system need to be retained and strengthened

The Trust has long championed a strong, effective land-use planning system, based on the fundamental principle that planning exists to serve the public interest. Of the utmost importance is that development within National Parks and AONBs is plan-led and takes a holistic, interdisciplinary approach to the landscape and its communities.

We do have concerns about elements of the National Planning Policy Framework and its effectiveness with regard to National Parks and AONBs. In particular we are concerned that the standard methodology for determining housing need and the new Housing Delivery Test will put pressure on land within designated landscapes where there is limited land available elsewhere for allocating housing. We would prefer to see the Letwin Review report and its recommendations on improving build-out rates implemented before the Test is introduced, rather than penalise local authorities for a failure to build which is not under their direct control.

AONBs need to be strengthened

AONBs and National Parks have equal levels of protection, but reductions in funding, and the limited tools available for AONBs to influence local planning decisions means that AONBs are weakened in comparison to National Parks. The Trust therefore wants to see AONBs strengthened. The following would support this:

- a) The governance and authority of AONBs should be improved, to increase their independence and influencing power. This might be done through new governance models or the appointment of independent or centrally appointed chairs of AONB boards or partnerships
- b) Funding for AONBs needs to be improved, and they need to have access to technical and specialist skills and knowledge – for the historic as well as natural environment.
- c) The protective status of AONBs need to be better understood and upheld

Governance arrangements should be reviewed

We recognise that there is wide variation across the country, but our experience is that there can be a tendency for National Parks to be very focused on local issues and concerns. This means that they are not always able to place sufficient weight on the wider national context when approaching decision making. In our view the make-up of governing bodies plays a part in this issue and we would like to see a rebalancing of membership to better represent national interests, potentially

¹ The Sandford Principle was established in 1974 to help strike the correct balance between conservation and recreation interests in National Parks. This sets out there 'if it appears that there is a conflict between those purposes, the National Park Authority shall attach greater weight to the purpose of conserving and enhancing the natural beauty, wildlife and cultural heritage of the area'.

through greater use of partnership structures or widening the representation through additional Secretary of State appointments.

For AONBs the relationship with local authorities who have control over funding can create a tension. There may be measures that could be explored to help introduce greater independence to AONB governing bodies, for example through the appointment of independent Chairs.

Reviewing governance arrangements for both AONBs and National Parks also presents opportunities to ensure more specialist expertise is represented, to support better delivery of the conservation purposes for both nature and the historic environment, and drive innovation of approach.

We would like to see a reinterpretation of core purposes

The existing statutory purposes of National Parks and AONBs do not explicitly reference key contemporary concerns such as climate change, public health and wellbeing, the need for clean air and water etc. These are important issues of national interest, and we believe there is a need to understand more clearly what the expectations should be in terms of the contributions of designated landscapes to these issues

There are a number of ways that this could be achieved – revising the statutory purposes of AONBs and National Parks that exist in legislation is one, but does come with risk that the existing purposes could be watered down. An alternative approach that we could support is the publication of a national policy statement or similar, providing an updated interpretation of the core purposes to National Parks and AONBs, which could provide a common understanding of the way in which the purposes should be applied to these contemporary issues, and set expectations for building them into decision making.

Consultation questions: Opening thoughts

7. What do you think works overall about the present system of National Parks and AONBs in England? Add any points that apply specifically to only National Parks or AONBs.

The National Parks and Access to the Countryside Act 1949 was the first piece of UK legislation to recognise the national importance of landscapes, and importantly it equally recognised their personal significance to the people who live and work in, and visit them. The world is very different now in comparison to 1949, but the enduring connection between people and the landscape is as strong as ever and has the power to evoke emotions and change the way that people think and feel. Designated landscapes' founding principles are closely aligned with those of the National Trust, recognising that landscapes are a coming together of the natural and the cultural; neither element is fully representative of their value without consideration of the other.

The **protections offered to our designated landscapes in terms of planning policy are crucial to help ensure these places remain special to people**. There are some challenges around the implementation of these protections in the operation of planning policy; in some landscapes, especially AONBs, protections are not always properly understood and are therefore not as effective as they could be. However, the **equivalence in levels of planning protection in**

National Parks and AONBs is appropriate and essential to maintain in order to preserve their natural and cultural features.

The nature of our protected landscapes in terms of wildlife, habitat, culture and history varies dramatically across the country. What they do have in common is that they all involve a wide range of stakeholders; land-owners, tenants, local authorities, local residents, and other organisations. There is much good practice to be seen in terms of partnership work which brings these groups together to deliver effectively. In our experience, **AONBs in particular are often adept at working collaboratively with key stakeholders, NGOs and government, and with one another, and in doing so can achieve much with relatively modest funding.** There is a strong AONB family which has demonstrated how effective working together and with others can be. There will be more detail on partnership working and collaboration in our response to Question 16.

We also welcome the more collaborative work that some National Parks have been doing, for example through Partnership boards – working as a collective voice will be critical to overcome some of the major issues these landscapes will face in the forthcoming years.

8. What do you think does not work overall about the system and might be changed? Add any points that apply specifically to National Parks or AONBs.

While the overall intention behind our designated landscapes is the right one, there are improvements that could be made in terms of delivery; many of these will be discussed in greater detail in our responses to the following questions. Experience across the Trust suggests that there is a lot of variation in practice and effectiveness between the National Parks and AONBs that we work with. Not all face the same problems, and some are delivering more effectively than others. So our following comments should be read as general points, with an acknowledgement that not all issues apply equally in all cases.

We believe that **the position of AONBs in general needs to be strengthened.** Their role and status are misinterpreted, despite covering 15% of England's overall landscape. At their creation, AONBs and National Parks were equally granted the highest level of protection by which to fulfil the ongoing purpose of conserving and enhancing their natural beauty, wildlife and cultural heritage. However, reductions in funding and the limited tools available for AONBs to influence local planning decisions mean that AONBs' ability to fulfil their purpose is weakened in comparison to National Parks. While National Parks enjoy a level of awareness of their status among the public, AONBs are widely misunderstood as a lower rank of protection and not as significant as National Park status when considering growth and development proposal. This misunderstanding can be perpetuated by the lack of specialist knowledge of AONBs and their rights and protections, sometimes even within their governing bodies. Our [2015 report on AONBs and Development](#) illustrates many of our concerns and a number of cases studies in relation to this point.

It would be helpful to clarify and promote AONBs' equal status of protection and ensure that there is an adequate level of expertise in their governing bodies. Demonstrable commitment from the Government would also support this aim, which means ensuring that these protections are respected in terms of major/national infrastructure schemes, as well as local planning decisions. This measure goes hand in hand with points we will make in following answers, touching on funding and governance of AONBs.

As noted previously, in order to achieve effective conservation and enhancement of a designated landscape, working together in a wider partnership with stakeholders is crucial. Ways of working amongst National Parks vary substantially: some are very traditional and others (such as the Lake District) are much more partnership-focused in delivering their outcomes. We find that in general there can be a tendency for them to be more inward-looking, less collaborative, and work more on their own local priorities.

We will talk in more detail in answer to Question 15 about the governance of National Parks and AONBs. However, we believe that **it would be worth reflecting on the degree to which National Parks across the board are working to deliver their purposes with the interest of the whole nation sufficiently in mind, and whether they are setting clear enough visions to meet the wider needs of the nation for the 21st Century.** There are many modern issues of significant public concern which National Parks should have a role in addressing; for example supporting public health and wellbeing, and tackling challenges such as obesity and mental health. They also have a responsibility to increase the diversity of their visitors and drive inclusion and access for all. Climate change presents a global challenge, and these sites should be (and in some, but not all cases are) leading the way in developing and implementing mitigations in terms of land use, sustainable transport and carbon sequestration, and showing best practice approaches to adaptation to help protect our natural and historic assets. Hand in hand with this is the need to think about the role that these landscapes play at the ecosystem level, and how they can help deliver improvements to ecosystem services such as water quality and biodiversity, and support delivery of the Government's 25 Year Environment Plan (more on which under Question 9). There is a role for central Government here too, in being clearer about their expectations of National Parks and how they see them fitting into, and helping to deliver their long term strategies to address these various issues.

Some of the tools intended to support effective management of these landscapes need to be used more effectively. Both AONBs and National Parks are required to prepare a statutory Management Plan setting out the special qualities and management objectives for the landscape, but these plans are not achieving their full potential. Management plans should be taken into account in planning processes, but they are not always given adequate weight when planning decisions are made, especially in AONBs which do not have their own Local Plans to support them and may be covered by numerous local plans containing different policies relating to the same AONB. We provide further comments about Management Plans under Question 10.

Finally, **guidance provided to designated landscapes in the National Planning Policy Framework (NPPF) is not clear enough.** This guidance states that planning for major developments within or just outside designated landscapes should be refused in all but 'exceptional circumstances and where it can be demonstrated applications are in the public interest', but this is open to interpretation. More guidance is required on the meaning of some of these key terms within the major development policy, including 'major development' itself, as there is a danger of a low bar being set if development is permitted in places where the basis for doing so is unclear.

Overall, the Trust thinks that **in general the principles behind National Parks and AONBs are the right ones, but the implementation of these principles is not of an equally high standard, which in some places has led to a de-prioritisation of landscape and nature.** In some cases this has led to a reduction in staff expertise and resource, with fewer landscape, ecology and heritage specialists. The framework and guidance by which designated landscapes work therefore

needs to be strengthened in order to allow for better implementation of principles and balance between delivering for nature, heritage and the people that use them.

It may be that **some consideration needs to be given to whether the statutory core purposes behind these designations are still the right ones**, and we will provide some further thoughts on this point in answer to Question 24.

Views

9. What views do you have about the role National Parks and AONBs play in nature conservation and biodiversity?

At the creation of the UK's designated landscapes in the National Parks and Access to the Countryside Act 1949, the national significance of natural landscapes and their beauty was principally recognised, and provision made for their protection. However, over the last 50 years nature has been systematically marginalised to make way for our own development, leading to significant and well documented loss of wildlife: 60% of species have declined over the last 50 years, including 54% of farmland birds since 1970, and 49% reduction in the distribution of bee species between 2009 and 2014. Our protected landscapes should stand out as areas in which the highest quality natural habitat can be found, and international equivalents are often examples of the richest geo- and biodiversity within their countries. However, England's protected landscapes are often no better in terms of habitat and biodiversity than non-designated areas, and in some places it could be claimed they have declined at a greater speed. A recent report by the Campaign for National Parks noted that:

“Wildlife is a critical component of the beauty of the Parks and the Parks are important for wildlife. They contain land that is designated for its national and international value for nature conservation. We know, however, that the National Parks are not bucking the national trends of decline in species and the ongoing degradation of habitats”

It is therefore clear that designated landscapes have thus far failed in this primary duty of conservation and enhancement with regard to nature, and must take urgent action to reverse this situation. The role of designated landscapes should be as the forerunners of a landscape-scale approach to nature conservation that builds on the ‘Lawton principles’ of bigger, better, more and joined up. They should be central to the delivery of the Government’s ambitions in their 25 Year Environment plan to leave the environment in a better condition for the next generation and high expectations should be set for them to serve as exemplars of land managed for nature and for people. In particular, **they should be the vehicles by which Government initiatives and policies on biodiversity and habitats can be achieved – particularly playing a key role in the expected future Nature Strategy, and the Nature Recovery Network**, for which they should be transformed to act as key “nodes” within wider ecological networks. Through ecological restoration they should serve as exemplars of land managed for nature and for people, and by strengthening the role of these designations in conserving and enhancing biodiversity, the condition of habitats and species both within and outside areas currently protected for nature within these designations will be improved, and the area of high quality semi-natural habitat within these landscapes will be increased.

Improving the way that they deliver for biodiversity and habitats (particularly priority habitats) must be achieved through working with local landowners and farmers to foster good environmental practice. There is also benefit to be gained from making better use of land which is not in cultivation to support the provision of wild areas of land, which can produce wider ecological benefits across the landscape. As an example of this in practice, the National Trust has been working in Exmoor to support this approach along the coast and on other steep valley sides inland.

Designated landscapes can be further helped to achieve these outcomes through **greater alignment and unity from Defra, Natural England, RPA and the Environment Agency**, who should be working together with the same goals in mind. Our experience is that there are significant missed opportunities and inefficiencies in how these organisations work together, and the 25 Year Plan should be used as a vehicle to review roles, and establish more efficient ways of working to achieve more.

Over the 70 years since National Parks and AONBs were created, research has shown the myriad benefits of a healthy natural environment beyond its intrinsic beauty, such as for the provision of ecosystem services, human wellbeing, and economic growth. The large scale of our National Parks and AONBs, puts them in a prime position to drive real change, play a role in inspiring a generation of naturalists and to place England and the UK internationally as a champion of sustainability. Some of England's designated landscapes are already demonstrating their potential effectiveness in providing services for people, such as the Peak District National Park, which is effectively managing peat bogs to store carbon from the atmosphere and help to fight climate change. In Exmoor, the reintroduction of beavers is helping to create a healthy, wild habitat while also developing flood defences for the area. **We would like to see these sorts of approaches widened and expanded.**

- a. **Could they do more to enhance our wildlife and support the recovery of our natural habitats?**

We believe that National Parks and AONBs are not currently delivering on their duty in relation to nature, and the restoration and strengthening of nature should be reinforced as one of the key focuses for designated landscapes.

Strengthening the role of these designations in conserving and enhancing biodiversity would help improve the condition of habitats and species (both within and outside areas currently protected for nature within these designations), and increase the area of high quality semi-natural habitat within these landscapes. **National Parks and AONBs should be actively working with landowners and managers in their areas on practical steps to support ecological improvement.** This could include identifying areas of relative wildness; supporting opportunities for the reintroduction of species; supporting the reduction of intensive land use; and promoting robust, functional ecosystems within natural processes. National Parks and AONBs should be looking at whole ecosystems across their landscapes, and considering where they play a key role in supporting the wider needs of the nation in terms of public goods such as clean water, flood management, carbon sequestration, air quality regulation and food production.

National Park Authorities (NPA) and local authorities responsible for designated landscapes can and should do more to ensure that nature is conserved and enhanced within their area, and greater recognition of the importance of designated landscapes for biodiversity and habitats must be demonstrated. **NPAs in particular should be showing greater leadership and ambition on**

raising the bar for nature within their areas - this could be supported by the creation of coherent strategies for improving nature within their landscapes, including specific goals and targets for habitat restoration and creation to be set nationally or as part of the Management Plan process. Some areas are already taking this approach, such as the Peak District National Park which produced its own [State of Nature report](#).

There is a challenge for authorities in accessing the specialist expertise that would allow them to be more effective in monitoring and enhancing the state of nature in their landscapes. **Their current models of governance and funding need to be reviewed in order to allow them to locate the expertise they are lacking in relation to conservation, ecology and landscape planning, which would enable better implementation of policy.** Further opportunities for sharing expertise between authorities both regionally and nationally should be explored.

We fully support the retention of the Sandford Principle, but it is not always properly implemented and enforced, occasionally leading to inappropriate or harmful development. **A similar approach to the Sandford principle for AONBs would help ensure that conservation and enhancement is prioritised if there is a conflict with recreational objectives.**

Management plans are tools that could be used more effectively; it could be helpful to include spatial representation that sets out which management policies are a priority for different areas, including opportunities for expanding and linking up fragmented habitats, supporting and allowing natural processes to flourish and enhancing natural capital and the removal of invasive or inappropriately located species. The implementation of the management plan should be underpinned by financial support from a future, locally tailored environmental land management policy, and there should be an obligation for governing bodies to monitor and review the effectiveness of their plans regularly.

10. What views do you have about the role National Parks and AONBs play in shaping landscape and beauty, or protecting cultural heritage?

The European Landscape Convention, of which the UK is a member, defines landscape as “an area, as perceived by people, whose character is the result of the action and interaction of natural and/or human factors”. As landscape designations, National Parks and AONBs must operate under this definition and the understanding that the landscape is not just nature, culture or people, but a combination of all three. The Trust believes that designated landscapes can best satisfy their many functions by adopting an interdisciplinary and context-based approach to decision-making that reflects this interaction. **For AONBs in particular there is a need to be clearer on their responsibility to protect cultural heritage as part of the landscape.**

It is important also to consider that designated landscapes are not immutable: they are places where people still live and work, alongside natural ecosystem processes as drivers of change. These landscapes cannot be allowed to stagnate in order to preserve their beauty; they must be allowed to evolve, as they have done for the previous millennia of human inhabitation. However, the evolution of the landscape must be undertaken in such a way as to be conducive with the purposes of the landscape, giving due consideration to aspects of cultural heritage. It should be recognised that the landscape must be able to change with the needs of its present inhabitants and, while it is not in its final form, it is not a blank canvas either.

The current purposes of National Parks, and the Sandford principle, support this approach well despite sometimes being inadequately applied. AONBs do not currently have a secondary purpose and currently lack a supporting Sandford-like principle ensuring prioritisation of landscape conservation over other objectives. **The National Trust would therefore support a strengthened duty in respect of conservation and an extension of the Sandford principle to AONBs.**

The National Trust believes that designated landscapes need to take an integrated, holistic approach to management that addresses the needs of both the cultural and natural elements of landscape, and that is based on evidence and experience. One of the tools by which AONBs and National Parks could be ensuring that they have the balance right is through their Management Plans, which set out the special qualities and character of the area and management objectives to promote natural beauty. In principle they have considerable force in setting the guidelines and parameters for judging impacts on or against the landscape, and development proposals may be refused on these grounds. **We would like to see plans given greater strength in practice**, and as standard include:

- Assessment of the special qualities and relevant significance of the landscape, ensuring that they reflect the cultural as well as natural landscape features. This could include landscape management plans, data from landscape character assessments, incorporating Historic England's new historic landscape character data where available;
- character assessment that includes its setting, condition and vulnerability to change;
- cross reference to existing plans, such as local transport plans or biodiversity action plans;
- a strategy, such as a 5 year plan, of how change will be managed;
- other special sites that exist in the landscape, such as scheduled ancient monuments or Sites of Special Scientific Interest (SSSI);
- an action plan, for example who is doing what, why and by when; and
- a monitoring plan to show how the condition and effectiveness of management of the landscape will be measured.

Currently, it is common for management plans to be taken into account in planning processes, but there may be potential for them to be adopted as supplementary planning guidance and gain additional weight in planning terms. **The power and extensiveness of management plans should be increased to allow for a more purpose-focused and streamlined planning process, by enabling harmony between culture and nature.**

National Parks and AONBs have responsibility for cultural heritage as well as natural beauty and wildlife. However, they don't always have sufficient access to the specialist skills needed to provide the right advice and support to help them address the specific needs of the historic environment. As a result they are not always engaging sufficiently with the historic conservation need. **It is important that National Parks and AONBs ensure that they have access to the expertise needed to conserve and protect their cultural heritage.**

11. What views do you have about the role National Parks and AONBs play in working with farmers and land managers and how might this change as the current system of farm payments is reformed?

Farmers and farming represent the most powerful force for on the ground management over most of our land, including in NPs and AONBs. Traditional farming methods have played a huge role in shaping the landscapes and places of beauty that we want to protect and the impacts have been both positive and negative, largely depending on the signals successive Governments have given on what is wanted from the land. They are crucial to the future of designated landscapes, and will

be the key to delivering the transformational improvements for nature and the environment that we want to see. They must be supported to continue to live and work in National Parks and AONBs. **It is therefore critical that National Parks and AONBs work more closely with the farmers and land managers on their sites to identify opportunities for innovation and collaboration, and that the signals given are clear, and aim to establish shared goals and priorities. At the core of these shared priorities must be the aim to make fundamental, good environmental practice the norm.**

The implementation of the new farming payment scheme will be fundamental to the future of farming, and to ensuring that improvements for the environment can be delivered. The Government is proposing to place an 'environmental land management' (ELM) system at the heart of a future agriculture policy in England, which will have a crucial role in securing landscape scale improvements in our natural environment and cultural heritage, helping deliver the ambition of the Government's 25 Year Environment Plan, and ensuring farmers and other land managers receive a fair return for delivering public goods. To achieve this, **the system must have a clear national framework and objectives, transparent lines of accountability and be able to combine these with local priorities through a flexible toolkit.**

We understand the new system will be predicated on a plan-based approach, a critical issue of which will be striking a balance between local and national priorities. One way to secure this balance could be to allow areas such as National Parks and AONBs to develop a 'local offer' to deliver against a range of local, national and international priorities, which would be funded where capable of delivering better outcomes than would otherwise be achieved through a national approach. In collaboration with the RSPB, Wildlife Trusts and National Parks England, we have developed an 'ELM Blueprint' which sets out our initial thinking on how such a plan-based approach could work in order that it is effective for the environment and delivers multiple public goods, is attractive for a wide range of farmers and land managers, and is deliverable and capable of meeting Government objectives.

Many National Parks and AONBs are irreplaceable repositories of vital natural capital to which we attach great importance as a nation. These areas also contain some of our best preserved historic landscapes and their component cultural heritage assets. If properly managed and supported, they offer great potential to deliver increasing levels of public and private benefits through a future ELM system. These include the provision of clean water, flood management, carbon sequestration, enhanced landscapes, public access and recreation and biodiversity. However, increasing evidence suggests that fixed-site objectives and standard management options are increasingly difficult to maintain in the face of large-scale environmental change. Indeed, ecological insight emphasises the need to manage and understand a range of ecosystem processes which might impact upon the integrity of protected areas. A careful balance will also therefore need to be struck and in some cases a shift achieved from managing sites to managing dynamic ecosystems in future.

Furthermore, such nationally designated landscapes are often extremely important visitor destinations, where the asset is the landscape, its wildlife and cultural heritage, but where the providers and carers of these assets cannot generally secure income from the millions of people that visit every year or the private sector that has a dependency on how the land is managed. The new ELM scheme will not only be an opportunity to help increase public access as a route to solving this problem but also provide the foundation for new market-based mechanisms which can

help leverage additional private sector investment and public support away from traditional grant funding.

12. What views do you have about the role National Parks and AONBs play in supporting and managing access and recreation?

Currently, only National Parks and AONBs with a Conservation Board have the statutory purpose to provide opportunities for enjoyment and understanding of the special qualities of their area, often shortened to “recreation”. However, it is valuable to note that many AONBs are also delivering on this purpose without explicitly having it, and in all cases it is likely there will be some element of public use of these landscapes for recreational activities. It is therefore vital for all designations to manage access and recreation responsibly.

The National Trust was founded on the belief that access to places of beauty is inherently necessary for the quality of life of all people, and the origin of designated landscapes shared the same philosophy. In recent years, the numerous wellbeing benefits associated with increased access and connection to nature and quality of place have been widely recognised and scientifically corroborated (including through our own “Places that Make Us” research in collaboration with the University of Surrey - <https://www.nationaltrust.org.uk/stories/why-do-places-mean-so-much>). Recreational activities in the outdoors, understanding and enjoyment of landscape are some of the means by which physical and mental health, emotional wellbeing and personal development can be achieved. **Designated landscapes should consider themselves champions for the improvement of the wellbeing of the population as a whole.**

Effective use of planning protections to maintain the rural setting and natural surroundings for those who inhabit and visit these areas is one element of delivering on this ambition, but it is also achieved by supporting and managing access to and engagement with nature and heritage. To enable consistent and well-informed management, designated landscapes need to be clear why and for whom they are providing recreational opportunities, and what kind of opportunities are appropriate within the setting of the landscape. The Peak District National Park’s management plan is an example of good practice in this area, and is very clear on their intent to improve accessibility of the National Park to all, including those with disabilities, from poorer backgrounds, and from urban areas outside the Park. Designated landscapes should recognise their responsibility to provide opportunities to engage in natural recreation for all sections of society, including those who live outside the landscape itself.

In the same vein as the Sandford principle, to be considered “appropriate”, recreational activities that take place within a designated landscape should – at the very least – not result in a negative impact on the special qualities of the area. **Where possible, they should support each other.** For example, Surrey Hills AONB has recently established a number of cycle paths throughout the area. These cycle paths serve the dual purpose of providing inhabitants and visitors with safe, high-quality routes to cycle, through which they can improve their overall wellbeing and consume more of the area, as well as protecting the habitats of the area’s ground-nesting birds by discouraging off-road cycling.

Finally, recreational opportunities must be well supported by infrastructure to allow easy access to them and maximise their effects. This can be achieved through **a plan-based approach to make provision for recreation in a way that is well supported by the landscape and infrastructure.**

13. What views do you have about the way National Park and AONB authorities affect people who live and work in their areas?

a. Are they properly supporting them and what could be done differently?

As the statutory planning authority of their areas, NPAs play a significant role in shaping their landscapes and the lives of the people that live and work within them. Designated landscapes in England are home to over 2.3 million people and, as such, the relationship between the conservation purpose and the demands of local people for jobs and investment can be very difficult – it can appear that they are in direct conflict, despite the duty to seek to “foster the economic and social well-being of local communities within the national parks”. NPAs can be seen as institutions that are unaccountable in local democratic terms, despite representation by local authority members. It is important that they engage with the needs and concerns of local people. Taking difficult decisions over planning and development can frustrate those whose proposals are denied, and NPAs must endeavour to find the right balance between people and place, taking those people’s lives and livelihoods into consideration when making decisions and managing their areas.

However, designated landscapes do not belong only to those who live within them. These landscapes are of significant importance nationally (and internationally) and must be managed as such. This significance must be given adequate weight in decision-making, and our experience is that in practice local perspectives will sometimes overshadow the needs of the wider public.

We make some detailed comments about governance arrangements for National Parks under Question 15. In reviewing governance arrangements and membership of NPAs, there may be an opportunity to consider whether the balance between local and national interest is being met in terms of representation; engagement with local communities can be supported in a number of ways through both the structures that currently exist and through new arrangements or structures. Our comments in answer to Question 17 also outline ways in which National Parks and AONBs can use activities such as volunteering to promote health and wellbeing, community cohesion and engagement, and provide opportunities for building skills and experience to benefit local people.

There is much research that shows how the conservation of fine landscapes can be a means to achieving vibrant communities, rather than obstructing it. The natural beauty of these landscapes and attractiveness of rural towns and villages within them helps drive tourism and attracts people to the region to live and work in rural communities, and they bring with them skills and investment. For rural economies National Parks and AONBs can be unique assets and drivers of growth. Strategies for economic development that focus on place, with an understanding of the interaction of landscape and community with wider regional contexts is essential. We believe that **protecting, enhancing and building more natural capital, and restoring the natural and historic environment can be a mechanism for thriving, prosperous communities.**

14. What views do you have on the role National Park and AONB authorities play on housing and transport in their areas?

As living, working landscapes, National Parks and AONBs must be able to evolve with their inhabitants and allow access to key services and infrastructure. Authorities must be mindful of their responsibility to both the landscape and to people when making provision for housing and transport

within their areas. However, **as landscapes primarily designated for their landscape character, conservation and enhancement must remain paramount in decision-making.**

The Trust has championed a strong, effective land-use planning system in England since the 1920s, based on the fundamental principle that planning exists to serve the public interest. **Of the utmost importance is that development within National Parks and AONBs is plan-led and takes a holistic, interdisciplinary approach to the landscape and its communities.**

Improving infrastructure such as public transport goes hand in hand with supporting rural communities and economies – and where infrastructure is developed sensitively it can also support access and the protection of the countryside and our environment. For example, good availability of public transport, cycle and footpath links are important to help reduce environmental impacts, particularly in high footfall areas. Some of the solutions used by the Lake District National Park, such as better use of cycle-ways and a mixed approach to transport, could be employed elsewhere - though even in the Lakes the ability to transport over 20 million visitors alongside the residential population is a significant and ongoing challenge, as providing alternative transport methods require serious consideration and planning. Focusing on sustainability is key, and the balance must be met between improving sustainable infrastructure and maintaining individuality and character of place (including natural and historic environmental factors), as part of a holistic approach to supporting rural economies.

In 2015 we commissioned research into development in AONBs and our subsequent report “AONBs and Development” highlighted a range of case studies, concerns and recommendations - <https://www.nationaltrust.org.uk/documents/national-trust-areas-of-outstanding-natural-beauty-and-development.pdf>. We believe that **NPAs and local authorities must work with their resident communities to identify and assess housing need and develop locally-agreed plans. Any housing development needs to be sensitive to the local environment, well designed and inclusive, in keeping and scale with its location, and sensitive to the character of the countryside and local distinctiveness.**

There may - where appropriate and sustainable to do so - be potential to make better use of existing historic buildings through changes of use and renovation. If this can be done in a way that respects and conserves the historic features of the building, and where there is sufficient availability of access, water and energy supply, it should be encouraged - particularly where this helps to ensure the future upkeep of traditional buildings and is supported by local communities. There are national-level policy interventions that could also support this approach – including considering the reduction of VAT on the restoration of historic properties.

With regard to national planning policy, in general protections against inappropriate development in designated landscape are good, and by acting as planning authorities in their own right, National Parks in particular have broad control over development in their landscapes. However, **all local authorities must work within the nationally set planning framework, and we do have concerns about elements of this framework and its effectiveness with regard to National Parks and AONBs.**

Firstly, the standard method for calculating housing need does not take statutory designations into account, meaning that landscape constraints are not reflected in the quantity of housing authorities are being asked to allocate. This makes it more likely that they will be unable to find sufficient land for housing outside of AONBs, and the presumption in favour of sustainable development on this

land will then apply. In addition, from 2020 the Housing Delivery Test would trigger a presumption in favour of sustainable development where delivery is below 75% of the housing required in an area. This means that there is an incentive to developers not to build, but to wait until delivery is below the required level to drive the release of additional green-field sites, as a cheaper option than developing on more difficult brown-field sites. This test applies to authorities that include AONBs, and while not to NPAs themselves, by their nature all statutory designations limit potential allocations of sites for development by local authorities. This test could therefore put pressure on environmentally sensitive areas in AONBs, and in the vicinity around National Parks and other designated sites, impacting on the setting and surrounding landscape.

A good example of these problems in practice is New Forest District Council, which covers an area of coastal Hampshire which is heavily in demand for housing, as a popular area to live and work. Its land area is generally of high environmental quality and is located in a wider area that is particularly rich in terms of biodiversity. The New Forest National Park covers 69% of the district land area, and some 86% is subject to a protective designation (either National Park, Green Belt, AONB or SSSI). New Forest District land area outside the National Park currently hosts 82% of the population. All their undeveloped land area is subject to habitat mitigation in respect of the New Forest or the Solent and Southampton Water SPA, making it challenging to take sites forward. It faces challenges around air quality issues, flood risk and minerals underlying the land. These constraints render any sites not allocated in the draft Local Plan as unsustainable development. It therefore has little choice but to consider sites within protected designations.

We would prefer to see the Letwin Review report and its recommendations on improving build-out rates implemented before the Test is introduced, rather than penalise local authorities for a failure to build which is not under their direct control.

We have already made reference to the fact that the protection afforded by AONB status is not always understood or respected by local authorities when it comes to planning and decision making. While AONBs need to be strengthened, we do not think that they necessarily need to become statutory planning authorities in their own right, which would drastically increase the scale of their work, potentially increase bureaucracy, and unless significant new funding were made available, likely make it even more difficult for them to achieve their purposes. However, it may be worth considering alternative models to improve their influence and impact, including whether the planning model used by the South Downs National Park, in which the NPA and constituent Local Authorities work in partnership to take a more integrated approach to planning, could have wider application.

Ways of working

15. What views do you have on the way they are governed individually at the moment? Is it effective or does it need to change, if so, how?

As highlighted in previous answers, the National Trust feels that the governance structures of both National Parks and AONBs need to be more effective – though there are slightly varying challenges between them.

AONBs are hosted by constituent local authorities, supported by a small staff working directly in relation to the AONB (AONB Units). Some of the larger AONBs cover, and are therefore jointly governed by, several different authorities, which can lead to a lack of consistency in their approach

to and understanding of the role of AONBs, which may be reflected in planning and funding decisions. It is perhaps understandable that some AONB Units and Partnerships might feel that their hands are tied when dealing with their governing local authorities, who have control over funding and resourcing. **There can also be a difficulty in terms of the scope that individual AONBs have to think strategically and put in place measures to deliver change or improvements on the ground.**

This is not a new challenge, and Conservation Boards were introduced by the Countryside and Rights of Way Act 2000 as a way to provide a more independent, National Park-like model for AONB governance. In practice this model has only been adopted in the Chiltern Hills and the Cotswolds, and we are aware of some reluctance to adopt this approach embedded in the concern that establishing Conservation Boards would actually make AONBs less effective than in their current state – becoming a statutory consultee in planning decisions would be burdensome, and their role could become more like a lobbying body rather than a partner. Establishing a Conservation Board also risks widening the gap between the AONB and its local authorities and adding an extra layer of bureaucracy into their governance, without guaranteeing them any extra power. We are therefore unclear as to the effectiveness of this model. The Conservation Board may be appropriate in some cases where multiple local authorities are involved, but clearly it has not solved all the issues of agency and independence that exist.

There may also be ways to strengthen governance for AONBs through greater independence of leadership – an independent Chair for AONB boards or partnerships for example, which could be a Secretary of State appointment; or to establish a requirement for other independent advisory or non-executive members or functions. This approach could also be a way of ensuring that AONBs have the skills and expertise they need to deliver improvements to the natural and historic features of their landscapes. If the direct link to local authorities is to be effective then certainly local authorities need to be more mindful of their responsibility for their AONBs and recognise that the myriad benefits of effective and sustained management are not just superficial, and are of both local and national importance.

In relation to National Parks, **the Trust would like to see a rebalancing of the membership of their governing bodies to represent national interests more effectively and be more innovative in their approach.** In most National Parks, governing bodies consist mostly of local authority representatives, whose wider remits tend to be very locally-led, and with a political focus on their immediate communities and constituencies. While practice does vary, in our experience there is a tendency for this to lead to highly localised and smaller scale concerns being given precedence over consideration of the national context and needs of the population of the nation as a whole. This impacts on decision making in a range of areas, including planning decisions, and can have a detrimental impact on the delivery of their core purposes. The National Trust recognises the responsibility of designated landscapes' governing bodies to support the communities and landowners within them, but they must also consider their national significance as England's best and most cherished landscapes, and work to deliver their purposes in the context of this bigger national picture. Safeguarding these national assets for the benefit of the whole nation and for future generations involves thinking strategically about the role Parks play in relation to wider concerns for the natural and historic environments, and for people - including increasing the diversity of visitors and supporting inclusion and access for all.

Potential options to help address this could include rebalancing the membership to include more representation from outside the immediate local area and include more expertise and wider

experience, or exploring new mechanisms to provide wider input from a broader range of stakeholders, such as the Lake District's Partnership Board. An increase in specialist expertise and national leadership in their governing bodies could also help to achieve this – perhaps through additional appointments made at a national level or more directly elected representation.

Greater leadership from central organisations, like Defra or Natural England, could also play a role in addressing some of the above problems, by providing stronger guidance to designated landscapes about what they should be delivering, helping to embed better understanding of the national role and importance of designated landscapes, and supporting the provision of specialist expertise.

16. What views do you have on whether they work collectively at the moment, for instance to share goals, encourage interest and involvement by the public and other organisations?

The National Trust strongly believes in the value of partnership working; there are many benefits brought about by sharing ideas, resources, expertise, and working together to achieve goals. Collectively, these benefits add up to the ability to be more effective and get more and better quality work done. NPAs and AONBs need to become adept at judging the right balance between exhibiting leadership for their area, and when to facilitate others to deliver in a collective partnership. In light of the complexities of these areas, with their various stakeholders and interest groups, this is sometimes a difficult judgement to make.

From our experience, many AONBs in particular put partnership working to good use, and there are clear successes, which can guide others to become collaborative both with outside organisations and each other. We offer a few examples of good practice that we are aware of below.

One example of designated landscapes sharing their resources and working collectively to great effect is that of Suffolk Coast & Heaths and Dedham Vale AONBs. Geographically these two AONBs are very close, but they have also shared their administrative teams since 2014. This came as a result of a funding uncertainty, where sharing administrative staff would save both AONBs money, but has been a great success, leading to public sector efficiencies and a stronger public narrative around AONBs in Suffolk, with a single team working together to champion the designation with local authorities and partners.

Another example is South Devon Outdoors, a 'not for profit' association of businesses and organisations promoting outdoor pursuits and tourism in the South Devon AONB. This group, whose members have signed the [Sustainable Activities Charter](#), is committed to facilitating access to and enjoyment of the AONB in conjunction with conservation and wellbeing objectives, and ensuring that a high standard is maintained. This group is an excellent example of how designated landscapes can enable partnership-working to achieve interconnected goals.

Regarding National Parks, the Lake District has a long standing partnership formed of representatives from the public, private, community and voluntary sectors, who have made a collective commitment to work together in the best interest of the National Park, its environment, communities, economy and visitors. This partnership holds a shared vision for the Park, which helps inform its strategic direction and Management Plan. In the wake of the Lake District's

designation as a World Heritage Site on top of being a National Park, the Partnership has created a single plan for the Lake District which satisfies the needs of all of its designations.

17. What views do you have on their efforts to involve people from all parts of society, to encourage volunteering and improve health and well-being

Volunteering has been a crucial element of the National Trust's work from the very beginning, and we believe that it provides clear benefits for both the individual and for us. There is evidence that people who volunteer are more likely to have better mental and physical health,² and the opportunity to contribute positively to society is something that many volunteers say is important to them. Volunteering also provides an opportunity to meet new people and develop new skills, and can therefore be a powerful tool to help tackle issues such as social isolation, and to help people in their communities.

The scale and nature of National Parks and AONBs invites volunteering to be a core element of their work, and play a significant part in engaging local people and communities from a variety of backgrounds with their landscape. Citizen science projects can actively support efforts to restore and enhance the natural environment through data gathering and monitoring, and can also support the gathering of information on historic landscape features through archaeological projects and other activities. There are plenty of examples of these approaches already being put to good use – for example the [Moors for the Future](http://www.moorsforthefuture.org.uk/community-science) project, which is engaging with residents and visitors of the Peak District National Park and South Pennine Moors Special Area of Conservation (SAC) to record valuable information about the impact of climate change on moorlands - <http://www.moorsforthefuture.org.uk/community-science> Another example is the [Fix the Fells](http://www.fixthefells.org) project, which has helped deal with maintenance liability of access infrastructure in the area. The New Forest is also working with volunteers to survey Scheduled Ancient Monuments - <https://www.newforestnpa.gov.uk/news/citizen-scientists-help-manage-ancient-monuments>

The symbiotic relationship between volunteering and wellbeing is exemplified by projects like GROW, which runs at the National Trust's Saddlescombe Farm in the South Downs National Park. Participants are those suffering mental health problems such as depression and anxiety, and are drawn mostly from nearby urban centres, such as Brighton and Burgess Hill (with transport provided). The project offers individuals a chance to enjoy a wide range of activities in a supportive group, led by experienced leaders. This includes guided nature walks, conservation, green woodworking, beach combing, shepherding, painting, and cooking. This programme has been thoroughly evaluated by Brighton University and the positive impact for participants is clear in their report, which identified for people including “positivity, nature connectedness, autonomy, belonging and social identity”. The Trust is now piloting a further scheme: Trust in Nature. Several GROW alumni are volunteering in this scheme to share what they have learnt from their experience of engaging with nature and how it has helped them.

Getting best use out of volunteering and community projects, and ensuring that opportunities are both fulfilling and valuable is something that requires time, experience and resource to manage well. Projects aimed at specific elements of mental or physical health, supporting ecological or archaeological activity will also require specialist expertise to be effective, and this can act as a barrier in some cases, particularly where resource is limited. **Success in many cases will**

² <https://blogs.ncvo.org.uk/2018/03/09/how-does-volunteering-impact-volunteers-five-things-to-consider/>

therefore come down to working effectively in partnership with others to make the most out of these approaches. Organisations such as our own can and do offer support, but AONBs and National Parks do need to also have a clear vision of their priorities and what they're hoping to achieve in order to make the best out of these partnerships.

Building connections with local urban centres is crucial to help widen audiences and reach, as it creates a connection to the people who might participate, and also to universities, local charities and other groups who can help provide expertise. Traditionally, designated landscapes in the North have played a key role in providing open access to nature amongst urban populations thereby contributing to wellbeing, such as the Peak District National Park for Sheffield and Manchester, but this connection seems less well developed in other parts of England. **The Review should consider the significance designated landscapes can have for urban audiences, how this access can grow and diversify, and how barriers to access can be overcome – especially for those who are vulnerable or from a lower socio-economic background.**

18. What views do you have on the way they are funded and how this might change?

Both AONBs and National Parks are under considerable financial pressure and being asked to do more with diminished budgets. This financial pressure is especially marked in AONBs as they are not entirely centrally funded but rely on local authorities, who are almost universally financially overstretched in England following reductions to centrally provided funding. As a result, there is large disparity between the level of funding received by the two designations, with National Parks receiving overall around 10 times as much funding as all AONBs altogether. For a specific example, the Cornwall AONB is 958 Km² – roughly the same geographical size as Dartmoor, at 954 Km². However, Cornwall AONB received just £235,000 in total grant from both local authority and Defra, compared to £3.7 million for Dartmoor in 2017/18. Changes to farming payments and removal of access to EU funding streams like LEADER also put AONBs in an uncertain situation.

There may also be scope for diversification of funding sources. In some cases, funding pressure is incentivising AONBs to consider pursuing Conservation Board models and become independent of their Local Authorities, which can be a vehicle for diversifying income streams. However, as discussed in our response to Question 15, this model is not necessarily suitable for all AONBs. A growing trend has been for some AONBs (and National Parks) to set up charitable trusts to help raise funds to supplement income. World Heritage UK is currently undertaking work to look at governance models for world heritage sites and how well they are resourcing themselves. Their Report, which is due in spring 2019 may provide a useful source of transferable thought and ideas for the future.

We are currently working with the HLF to seek ambitious and sustainable solutions to protect and enhance public parks and green spaces: <https://www.hlf.org.uk/about-us/news-features/hlf-and-national-trust-join-forces-improve-parks>. Our “Future Parks” toolkit looks to provide a model for shifting to seeing land as an asset which can generate income by providing a range of services, and there may be lessons for AONBs to take from this to help them draw on a range of income sources rather than just central funding.

It is suggested by some that the funding pot for AONBs simply be increased; research by the NAAONB found that just 20p per person of public money is granted to AONBs altogether, and suggests that increase to 40p would solve their funding problems. The National Trust has

sympathy with this ask, but also notes that stability of funding can be as important as the total quantity, and uncertainty can cause difficulties with planning and managing resource. We are aware of situations where AONBs have been unable to employ officers on more than short-term contracts because of their funding uncertainty. Joining forces can be a way of pooling funding to achieve more, as previously noted in the example of Suffolk Coast & Heaths and Dedham Vale AONBs. This kind of partnership working and collaboration can help to alleviate funding stress and enable better and more stable resourcing. A radical option could be to create a national unit that provides back office support for AONBs, which could provide a more streamlined approach to support services such as HR, reducing the burden on individual AONB units. The Review should also consider the examples of Surrey Hills and North Pennines AONB which have taken steps to diversify their funding streams to great effect.

The situation is less acute for National Parks, but they are not entirely without financial challenge: according to the Campaign for National Parks, National Parks faced a 40% real terms budget cut between 2010 and 2015, from £55 million to approximately £46.6 million. As the UK leaves the EU it is likely that National Parks will be impacted by the ending of CAP and other funding streams. The new ELM scheme will be critical as a source of funding to help National Parks deliver on their purposes (and as noted previously it also presents an opportunity to provide the foundation for new market-based mechanisms which can help leverage additional private sector investment which they might benefit from in the long term), and the Government must ensure that sufficient funding is made available in the overall scheme to deliver against the need for environmental improvement. We want to see the Government committing to multi-annual budget plans for its CAP replacement scheme, to ensure that this will be the case.

The proposed UK Shared Prosperity Fund is also intended to support economic development through supporting place-based projects and initiatives. Given the economic and social importance of our National Parks, not only for the towns and villages within their borders, but for nearby urban centres and wider regions, it should be a potential source of funding for landscape, heritage or local development projects. However, this will require Local Industrial Strategies and Local Enterprise Partnerships to fully recognise the contribution that these landscapes make to rural economies and social value.

19. What views do you have on the process of designation - which means the way boundaries are defined and changed?

From our experience with the Suffolk Coast & Heaths AONB and their recent boundary extension, the National Trust feels that the current process of designation is broadly clear and effective. However, there are a few things that we would like to ensure are not forgotten when designating a new area or extending or changing an existing boundary.

Primarily, the Trust feels that any case for designation of a landscape, or extension of an existing landscape, should be solidly evidence-based and driven by landscape quality.

Some of the most recent examples of new National Park designation, in the New Forest and South Downs National Parks have been arguably controversial. These designations were among the 10 English landscapes originally identified in the Hobhouse Review, and so a case could be made, but in the elapsed time since then the quality of the landscape had arguably decreased to below the level expected from such designations. It could be felt that the designation of the two landscapes was principally driven by a fear of further development in the area, rather than as a recognition of

their high quality and cohesive landscape character. The South Downs is especially contentious as it contains part of the western Weald, a geologically and ecologically quite different district, which impacts on the unity of the landscape as a whole.

Designation should be on a landscape scale. Landscape can be understood as a collective of all features of an often large area of land, encompassing its natural and man-made characteristics, and designation should be in consideration of this. The New Forest's landscape is very distinct and unique to its area, with horses and ponies only found wandering freely in this specific area, and it is logical for it to be recognised as such.

Natural England's guidance for designation is extensive, and very clear on the natural aspects of designation. However, the Trust feels that the cultural aspects are not adequately expressed. The majority of the criteria for designation is concerned with naturalness and wildness, and the cultural heritage criterion stipulates that it is in relation to the natural beauty of the area rather than its historic significance. While there is an understanding the historic significance is a part of "natural beauty", this lack of explicit reference arguably undervalues the historic and cultural aspects of landscape. **The Review should consider how well the historic environment is recognised for its intrinsic value under current arrangements.**

20. What views do you have on whether areas should be given new designations? For instance, the creation of new National Parks or AONBs, or new types of designations for marine areas, urban landscapes or those near built-up areas

If new designations are to be made, they should be in recognition of an intelligible landscape character, of the integrated natural and cultural heritage of the area, and on a case-by-case basis. While the Trust is a supporter of landscape designation and recognises its potential in redressing some of the issues faced by people and the nation in the 21st century, we are concerned that further designation of new areas could undermine those currently in existence (particularly if additional funding is not made available) and, **while bids should be considered on their merits, we think that this Review should focus on enabling existing designated landscapes to better achieve their purposes rather than creating new designations.** Given the challenges being faced by existing landscapes to deliver on their purposes, **the Trust would not support bids for new designation or types of designation without a commitment for additional funding to be provided**, and that the overall pot available would not be spread more thinly than at present. It is also the case that there is already a variety of landscape designations in England, which often overlap. It may therefore be of more value for this Review to consider ways to ensure an effective working relationship between the designations, rather than creating more.

However, the Trust does feel that there may be a gap in existing provision when it comes to coastal and marine areas. Similar to SCAs or SSSIs, Marine Conservation Zones (MCZ) provide targeted conservation of rare marine habitats and species, but they are not terrestrial, highly localised and arguably lack the scope to work on the same national level as National Parks or AONBs.

A new National Coast Park designation potentially offers a radical model for a designation which combines both terrestrial and marine areas, and could be an option worth further consideration. This idea is for the creation of a designation that would incorporate the whole of the coastal landscape around England into a single entity. Such a designation could tie into the new England

Coast Path, which would essentially become the main public access through the Park. It could have strong positive benefits for biodiversity, allow for more sea- and seaside-based opportunities and create a clear sense of identity and continuity through English coastal landscapes.

A similar effect could be created on a smaller, more localised scale through multiple, distinct Coast Parks for different regions, or through the reinvigoration of the Heritage Coast designation. The Review might also wish to consider whether natural harbour areas such as Chichester Harbour AONB, or lowland marsh could benefit from purposes more specific to their landscape and uses, as in the case of the Broads. As discussed above, however, any designation should be in consideration of the existing criteria and be fully backed by funding.

Another concept that the Review might wish to reflect on is that of National Park cities. Greater London and the West Midlands have been suggested as potential National Park Cities, with London having a foundation to back it up and a planned launch season in Spring 2019. Creating this kind of green city could greatly benefit inhabitants and visitors to the area, but are substantively different to traditional National Parks, facing very different challenges. An urban landscape designation would need to have separate purposes, guidance and designation criteria, and experience from world heritage designations is that this can be highly complex. There may also be more value in providing better access to existing designated landscapes for people in cities and urban areas than designating those areas themselves.

21. Are there lessons that might be learnt from the way designated landscapes work in other parts of the United Kingdom, or abroad?

Different countries define their designated landscapes slightly differently, and we think there is value in considering whether their approaches might be put to good use in our own National Parks and AONBs. Both National Parks and AONBs are designated as Category V: Protected landscape / seascape by the IUCN, and this Review should consider other Category V areas such as Spain's Natural Parks, as well as designated landscapes of other categories such as the United States' National Parks which are especially notable for their success with nature conservation and ecology. The Review may also want to note Japan's Cultural Landscapes and system of National Parks.

Apart from the lessons around governance, funding and approach, it may be that there are skills and specialisms abroad that our own landscapes would benefit from. The National Trust would support efforts to ensure that learning and experience is shared across international borders, especially in connection to dealing with global issues of conservation and climate change mitigation and adaptation. Aside from how these international parks are set up, the Review should also consider the significance of working more closely with other IUCN designations, as part of the Global Parks family. Both national and international collaboration are crucial in redressing the world's most pressing issues.

The Review may also want to consider UNESCO designations such as World Heritage Sites, Biosphere Reserves, or Global Geoparks, which are unified geographical areas of international geological significance, managed with a holistic concept of protection, education and sustainable development.

Scotland can offer some interesting examples of landscape designation, with their National Scenic Areas (NSA) considered as an equivalent to England's AONBs, though they are often located in

remote and uninhabited areas, and also include some seascapes. Like AONBs, NSAs are managed by constituent local authorities, but unlike AONBs they are not statutorily required to create a management plan and the Scottish Government plays a more active role. Scotland's designated landscapes also have differing statutory purposes to those in England. We provide some more thought on the subject of purposes in answer to Question 24, but the Glover Review may wish to consider the effectiveness of the four "aims" of Scottish National Parks and whether they could provide a model which could benefit our own designated landscapes.

Closing thoughts

22. Do you think the terms currently used are the right ones? Would you suggest an alternative title for AONBs, for instance and if so what?

We have discussed in earlier responses the problem of a lack of understanding of the AONB designation, and a common misinterpretation of its protective status as being less than that granted to National Parks. This is not only a problem for the general public, but one which we believe influences decision-making by local authorities, particularly in relation to planning. "AONB" is clearly not recognised as a brand in the same way as "National Park". This may be a fault with the name, which doesn't easily trip off the tongue – but equally it could be a problem of lack of awareness, and greater education and promotion may be an answer. We do not have a specific recommendation for a replacement if "AONB" were to be revised, but it would need to be something simple and easily recognised, which maintained a distinction from that of the National Park.

23. The review has been asked to consider how designated landscapes work with other designations such as National Trails, Sites of Special Scientific Interest (SSSIs), Special Areas of Conservation (SACs), National Nature Reserves (NNRs) and Special Protected Areas (SPAs). Do you have any thoughts on how these relationships work and whether they could be improved?

SSSIs, SACs, SPAs and NNRs can represent some of our best quality sites for nature and geology, and do tend to be in better ecological condition than the wider countryside. There is significant overlap between these designations and National Parks and AONBs – for example 24% of National Park land is also designated SSSI.

Although generally (though not universally) of higher nature value, these sites tend to be isolated, and where they are located within wider landscapes such as National Parks, **we would like to see greater focus given to the role that they can play both for nature and ecosystem services, and for people as a key part of those wider geographical settings.** Some of those sites not in favourable condition are as a result of the land management practices taking place. **Priority should be given to restoring these sites to favourable status as a matter of urgency, particularly where they are within National Park or AONBs.**

In our experience these sites are less understood by the public than either National Parks or AONBs. However, they offer potential opportunities for engaging the public with nature and their special features and wildlife. Better signage and information, alongside paths and access where appropriate could make better use of these sites for visitors of National Parks and AONBs – though as ever the balance between the protection of the features of the site and making the most out of them for people needs to be carefully considered and managed. NNRs do this particularly well, and NNR status could be used more explicitly as an accolade assigned to the best examples of where

conservation, science and people engagement are exemplary. There will be parts of some National Parks and AONBs where the NNR tag would be appropriate as a benchmark, and ecologically from which the special features of such a high nature value site can flow over into the surrounding landscape (if this is in a condition to receive them).

We have previously commented on **the need for better coordination between Natural England, Defra and other agencies**, and the monitoring and protection of these sites is another area where we have experienced difficulties of a lack of join-up, and conflict between priorities and approaches. More efficient ways of working and clearer shared vision for the management of these sites within the context of the wider aims of the 25 Year Environment Plan would be extremely beneficial. There is also a recognised need for better monitoring and data about the condition of some of these sites.

24. Do you have any other points you would like to make that are not covered above?

The National Parks and Access to the Countryside Act 1949, led the way in the development of legislation for the protection of outstanding landscapes in the UK. However, a great deal has changed since 1949 in terms of environmental and social change. The challenges that society faces in 2018 are not the same as those being faced in 1949, and we have noted throughout our response that our designated landscapes should play a key role in helping address some of the biggest public policy challenges of the 21st Century. There may be a higher-order question to consider, which is whether the statutory purposes of National Parks and AONBs are still the right ones.

The existing purposes have evolved over time, as has our use of language and understanding of our environment. Certainly **there is a clear argument for formalising the understanding of terms such as “natural beauty and wildlife”** as being more broadly about “landscape and nature” in order to reflect wider aspects of the natural environment. Scientific terms such as “biodiversity” are currently absent from the language of the legislation, and we would support National Parks and/or AONBs having more explicit statutory responsibility to manage natural resources sustainably, provision ecosystem services and support mitigation of the impacts of climate change. “Cultural heritage” is widely understood and valued – but is missing from explicit reference for AONBs, which only have a single purpose to “conserve and enhance natural beauty” (unless they have a Conservation Board which introduces the understanding and enjoyment purpose). There is also an argument for the inclusion of “wellbeing” or “health” as well as “understanding and enjoyment”, to recognise that designated landscapes could potentially be central to national ambitions to build a healthier society.

Revisions to statute would also introduce an opportunity to formalise and strengthen the Sandford principle in conjunction with any change to the core purposes, or that the duty on public bodies to “have regard for” the National Park and AONB purposes be strengthened to something like “contribute to”, “further”, or “support”.

On balance we believe that refreshing the purposes to reflect these changes would be beneficial. However, opening up statutory purposes entails risk, which would need to be carefully judged against the potential benefits of doing so. The existing purposes are broadly understood, and have stood up to test and challenge over time. Changes to primary legislation risk watering down the existing purposes (whether intended or not), or creating uncertainty which could hinder delivery. We would also note the experience of the Marsden review; redrafting of the purposes is very complex and could require more time and resource than the Glover Review or Government can

commit to in this Review. It may not be a good precedent to set to decide that the purposes need to be re-drawn for each generation – what might suit the language and challenge of 2018, might be out of fashion in another 20 years.

There may be ways to achieve similar outcomes outside of statutory change. We would support a reinterpretation of the purposes to be clearer about the ways that they should interact with the above considerations (biodiversity, climate, public health) and be representative of the challenges faced by designated landscapes in the 21st century. It would also be helpful to more clearly express the kinds of things we want designated landscapes to achieve for people, nature and heritage across the nation as a whole. This could potentially be done under the existing purposes, through a national policy statement, (perhaps similar in nature to the National Parks Circular of 2010), or more detailed supplementary guidance to back up the existing purposes.

In addition, **the Trust would like to see more guidance on major development planning**, in which terms like “exceptional circumstances”, “public interest” and even “major development” itself are vague and interpretive, and inappropriate development is being approved in areas that are supposedly protected. The example of the potash mine to be built in the North York Moors will be an important consideration for the Review as the exceptional circumstances and public interest for which it was approved are not strong, and it will cause irreparable damage to this nationally significant landscape. Improved guidance would hopefully lead to the same outcome as a change in purpose, in which terms are more clearly defined and relevant to the 21st century, consistency from one landscape authority to another is improved, and the purposes can be better delivered upon, whichever form they take.

Throughout all of our responses, we have advocated for a more holistic approach to be taken within designated landscapes, but also in areas outside of them, and nationally. We believe in an approach to landscape conservation that is interdisciplinary, integrated, collaborative, and which generates public good beyond its intrinsic value. We feel that on all of the points raised in these questions, National Parks and AONBs have the potential to be exemplars and pioneers around which this approach can be demonstrated, they can lead the way in promoting a step-change in the way England interacts with its landscape.

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