

CPRE response to Landscapes Review of National Parks and AONBs: call for evidence



Part 1 – Opening thoughts

Question	Response
<p>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.</p>	<p>England's network of National Parks and AONBs has become an integral part of our national identity and has the potential to deliver even more for society. Their strong foundations have stood the test of time and shown how strategic and forward thinking the Hobhouse report was in identifying our existing network of designated landscapes. Indeed, CPRE's creation in 1926 was inspired by early campaigns for rural planning, National Parks and to prevent urban sprawl, in sum to conserve the visual beauty of our landscapes. National Parks and AONBs offer great value for money, having a significant impact on the landscapes they champion, and will be particularly important in the successful delivery of the 25-year Environment Plan and the new Environmental Land Management Scheme.</p> <p>SPECIFIC POINTS: NATIONAL PARKS</p> <ul style="list-style-type: none">• Overarching planning authority: Having a single National Park Authority (NPA) means that decisions about the whole landscape can be made by one body (a 'unitary' approach). This means there will be a consistent approach, underpinned by a shared Local Plan, even where certain planning functions have been delegated to constituent local authorities. NPAs are also statutory consultees for development proposals which affect land within the National Park, such as those proposed by Highways England or Network Rail.• Value for money: Public spending on National Parks is less than £1 per person per year, but the 94 million visitors to National Parks and surrounding areas spend more than £5bn and support 75,000 full-time jobs. [i]• Coherent approach to management: The Management Plans for National Parks mean that there will be a coherent landscape-scale effort to manage the landscape holistically. Of course this depends on working with farmers, land managers and other organisations such as County Wildlife Trusts.• Education and recreation: The second purpose of National Parks means that they are able to manage recreation opportunities and pressures effectively. They also have an important role in delivering education about the National Park, via dedicated events and visitor centres. Their overarching role should also enable them to encourage sustainable tourism, e.g. by acting as a gateway to information on accommodation, car-free travel, and walking routes. (See our detailed answers to Q12 and Q14)

	<p>AONBs</p> <ul style="list-style-type: none"> • They are great value for money: every £1 of public investment is turned into £10 by the AONB partnerships, and the 156 million people visiting AONBs annually spend in excess of £2bn and support thousands of jobs and businesses.[ii] These nationally important landscapes provide opportunities to enjoy recreation, experience tranquillity and dark skies, and understand what makes each AONB special all while the AONB staff do their best to protect and enhance what makes that AONB special. • The Countryside and Rights of Way (CROW) Act 2000 was an important step in confirming the importance of AONBs and making provision for the creation of AONB Conservation Boards, which have the same governance arrangements as National Parks and the second (National Park) purpose of increasing the understanding and enjoyment by the public of the special qualities of the area. This has been a successful model in the Cotswolds and Chilterns AONBs. • AONB Management Plans are viewed as being comprehensive, setting out the special qualities of the area, the key issues to be addressed, and a vision and objectives for the longer term. They also form the basis for community engagement and volunteering opportunities. (This applies equally to National Park Management Plans). <hr/> <p>[i] National Parks England, National Parks, National Assets: http://www.nationalparksengland.org.uk/_data/assets/pdf_file/0015/1070313/INFOGRAPHIC-2017-hi-res.pdf</p> <p>[ii] NAAONB, The Value of AONBs: http://www.landscapesforlife.org.uk/wp-content/uploads/2017/05/AONB-INFOGRAPHIC-England.pdf</p>
<p>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.</p>	<p>CPRE's vision for England's National Parks and AONBs is that there will be greater access to these landscapes so that they can benefit even more people, improving their health and wellbeing, as well as instilling a love for these special places. There should be a concerted effort to increase opportunities for everyone to enjoy the benefits that they can bring by promoting affordable and accessible ways to explore these places, such as sustainable public transport. We want to see thriving rural communities within National Parks and AONBs, with well-designed and truly affordable housing to meet local needs. The character of these landscapes and their special qualities will be enhanced through the new Environmental Land Management Scheme, which will help to restore wildlife and habitats.</p> <p>While there is much that is good about the current system for National Parks and AONBs, there is definitely room for making them even better in the future.</p>

	<p>Overall, we believe more needs to be done to:</p> <ul style="list-style-type: none"> • Support sustainable transport: Visitors to National Parks currently rely overwhelmingly on private cars to get around, with 93% of journeys made by car. Better sustainable transport provision in National Parks and AONBs would enable a wider cross-section of society to access these wonderful landscapes. (see our detailed answer to Q14) • Affordable housing: Lack of truly affordable housing is a critical problem in many of our National Parks and AONBs. High house prices and private rents, low wages and high levels of second home ownership all make it difficult for many residents to get onto the housing ladder, or find an appropriate home to rent. Planning authorities should have the power to plan positively for affordable housing provision to make communities more sustainable. (see our response to Q14) • Strengthen the 'Duty of Regard': Despite a statutory requirement that relevant authorities shall 'have regard' when exercising or performing any functions in relation to, or so as to affect land within designated landscapes, many decisions affecting National Parks and AONBs clearly show that the current duty is ineffective and needs to be strengthened. We suggest that the weak 'duty of regard' be replaced with a 'duty of due regard' or a 'duty to further AONB or National Park purposes', which would provide all relevant bodies with a clear framework within which to operate. (see our detailed answer to Q10) • Access: Both National Parks and AONBs should work to ensure that there are adequate plans in place to enable easy access to these landscapes by ensuring that there are equal opportunities for access e.g. for wheelchair users (see our response to Q12) • Outreach to new audiences: Designated landscapes are held in trust for the nation, free for all to access, and this must remain the case as the population changes. Efforts to engage people from all parts of society are therefore essential and must be improved and enhanced. (see our detailed answer to Q17) • Tourism: National Parks and AONBs should encourage and promote a balanced mix of accommodation providers that are affordable to a wide range of visitors. They should use their influence to ensure that anyone can experience these landscapes, regardless of their socio-economic background. <p>SPECIFIC POINTS: NATIONAL PARKS</p> <ul style="list-style-type: none"> • Tourism pressure: National Parks could do more to manage tourism pressure e.g. via developing Visitor Giving Schemes where visitors can donate to enhance the place
--	--

they are visiting. An example of this is the recently created Lake District Foundation, which works with local businesses and visitors to raise funds towards enhancement projects (<https://www.lakedistrictfoundation.org>).

AONBs

- Development planning in AONBs: There is an urgent need to take a holistic approach to planning in AONBs, so that the integrity of these nationally important landscapes is maintained and enhanced. Our suggestion is that there should be a shared policy framework in AONBs where there are two or more constituent local authorities, to deliver a consistent approach to land use decisions. (see our response to Q14)
- Management Plans: They are adopted by local authorities but their implementation is not mandatory. This could be improved by i) making AONBs statutory consultees on any significant planning application that would affect the AONB or its setting and ii) effective monitoring of Plans in setting objectives, targets and delivering the desired outcomes. (See our response to Q14)
- Resources: This is a particular issue for AONBs, as they are not adequately funded for the benefits they deliver to the nation. (see our response to Q18)

SUMMARY OF CPRE'S RECOMMENDATIONS TO THE PANEL

CPRE's three priority recommendations that need to be addressed so that the future of our existing National Parks and AONBs is stronger, are:

Greater access

Recommendation: To take a step towards improving and normalising access and participation in designated landscapes, CPRE recommends:

- A bold ambition for every child to visit a designated landscape through a school visit before the age of 11.
- Opportunities throughout the curriculum to learn about the physical, historic, social and cultural contexts which led to their designation and created their unique character.
- Share, support and adequately resource best practice engagement projects with Black, Asian and Minority Ethnic (BAME) communities, such as the Mosaic Model of recruiting 'community champions' and helping organisations improve outreach activities.
- Outreach activities should be targeted toward schools in areas with poorer representation of 'outdoor classroom'

	<p>activities, with specific opportunities for residential visits for schools from poorly represented areas. These opportunities must come with details on how to access them by public transport and offer fair allocation of residential opportunities, for example to YHAs, when necessary. Such trips should prioritise visiting the closest National Parks or AONBs, but we recognise not all areas of the country are well served by the existing network.</p> <ul style="list-style-type: none"> ● Reinststate MENE research with children to establish a baseline from which to measure the success of future policies. (See our response to Q17) <p><u>A holistic approach to planning in AONBs</u></p> <p>Recommendation: AONBs with two or more constituent planning authorities should have a consistent set of specific area-based policies, adopted by all the constituent planning authorities in their local plans. (See our response to Q14)</p> <p><u>Affordable housing</u></p> <p>Recommendation: New housing development in National Parks and AONBs should focus on meeting identified need for truly affordable homes to support local communities. (See our response to Q14)</p> <p>Other recommendations we make in our response are:</p> <p>National Parks & AONBs:</p> <ol style="list-style-type: none"> 1. Recommendation: National Parks and AONBs should be exemplars of how to enhance wildlife and habitats, focusing on providing more, bigger, better managed and more joined-up habitats and landscapes. Ambitious targets should be enshrined in Management Plans and closely monitored to measure progress towards these goals. (See our response to Q9) 2. Recommendation: Strengthen the 'duty of regard' to become a duty of due regard or a duty to further National Park or AONB purposes. 3. Recommendation: Encourage NPAs and AONBs to have policies in Management Plans and local plans to control light pollution and work towards Dark Sky status. (See our response to Q10) 4. Recommendation: Development of the Environmental Land Management Scheme (ELMS) should ensure expertise from NPAs and AONBs is incorporated into the design of both universal and targeted levels for their area; and for them to play a key role in the delivery of the scheme. (See our response to Q11)
--	--

5. **Recommendation:** ELM contracts should consider benefits holistically, with a strategic approach to land use, identifying opportunities to deliver multiple benefits while supporting and enhancing the beautiful, functioning landscapes which make designated landscapes valuable in the first place. (See our response to Q11)
6. **Recommendation:** National Parks and AONBs should work to ensure that there are adequate plans in place for sustainable public transport to enable easy 'access for all' to these landscapes, as well as affordable accommodation. (See our response to Q12)
7. **Recommendation:** NPAs and AONB bodies should take a greater strategic role in ensuring integrated transport to and around their areas. This should involve increased collaboration with local partners to identify and promote sustainable transport access to these landscapes and to secure necessary funding. (see our response to Q14)
8. **Recommendation:** Voluntary activities that serve local communities should be extended in all National Parks and AONBs, with management bodies operating as leaders and coordinators of volunteering activities to strengthen community-wellbeing. This should include sharing best practice on hosting and disseminating volunteering opportunities organised by NGOs and community groups. (See our response to Q17)
9. **Recommendation:** There should be a clear, collaborative, transparent and consistent process for prioritising and pursuing new designations. (See our response to Q19)
10. **Recommendation:** Natural England should produce a realistic shortlist of future designation work, prioritised against transparent criteria, which have themselves been subject to public consultation and with a properly resourced programme to address the list put in place. We suggest that a 21st century programme of designations should focus on improving access in areas that are not currently well served by the existing network of National Parks and AONBs. (See our response to Q20)
11. **Recommendation:** Any new urban designation should take a strategic approach and ensure that it will benefit residents, visitors and the wider environment. (See our response to Q20)

National Parks:

12. **Recommendation:** Specific support should be provided by NPAs and through the new ELMS to improve access to farms and the general countryside, and to enhance the features that deliver particular benefits to health and wellbeing, such as tranquillity, dark skies, cultural heritage and landscape beauty. (see our response to Q17)

	<p>13. Recommendation: National Parks should be adequately resourced by central government for the vital job they do, in a way that benefits their communities and other stakeholders, including farmers, land managers, businesses and voluntary societies. (See our response to Q18)</p> <p>AONBs:</p> <p>14. Recommendation: AONB partnerships should become statutory consultees on any significant planning application that would affect the AONB or its setting. (See our response to Q14)</p> <p>15. Recommendation: Strengthen governance by:</p> <ul style="list-style-type: none"> • Allowing AONBs greater independence from their local authorities, which could be partly achieved by nationally appointing a proportion of AONB Board members to reflect the national importance of these landscapes. • Supporting flexible and locally appropriate models of governance, such as Conservation Boards, to ensure that AONBs they are managed most effectively. • Granting AONB partnerships a legal status and a statutory duty to implement Management Plans with associated scrutiny and accountability, requiring constituent local authorities to ensure they are appropriately referenced in local plans. • Recognising and supporting the AONB teams in their areas and the important role of AONB partnerships in providing specialist advice into the planning process. (See our response to Q15) <p>16. Recommendation: The 2017 accord between National Parks England and Public Health England, should be extended to cover AONBs, with best practice in social prescribing shared to establish ties between designated landscape access schemes and NHS Trusts. (See our response to Q17)</p> <p>17. Recommendation: Funding for AONBs should be reviewed so that they are appropriately resourced in the future, in recognition of their importance to the nation. (See our response to Q18)</p>
Part 2 - views	
9. What views do you have about the role National Parks and AONBs play in nature conservation and biodiversity?	CPRE believes that National Parks and AONBs have a vital role to play in nature conservation and biodiversity. Not only is the first statutory purpose of National Parks ‘to conserve and enhance natural beauty, wildlife and cultural heritage’ (with biodiversity an essential component of natural beauty), but across these protected landscapes extensive and healthy habitats are needed to provide

<p>a) Could they do more to enhance our wildlife and support the recovery of our natural habitats?</p>	<p>the ecosystem services that are the ‘heartbeat’ of the rest of the country. As is well known, the peat bogs and soils of the uplands are vital carbon stores and store and filter water, greatly aiding water quality, water regulation and water availability downstream. Equally, all the chalk and lime-based AONBs have important aquifers providing, amongst other things, the primary water sources of the South East. In the face of climate change these functions are ever more important. It is healthy natural landscapes that deliver the highest level and range of ecosystem services.</p> <p>The importance of protected landscapes to nature conservation is underlined by the statistics. No less than 50% of the sites identified nationally as priorities for conservation are found in our National Parks and AONBs, together covering 24% of England, and over half of Sites of Special Scientific Interest (SSSIs) lie inside our National Parks and AONBs. Similarly, over 40% of all National Nature Reserves and Ancient Woodland are located here. Our protected landscapes therefore offer the most important concentrations of natural habitat in England.</p> <p>At the time when the early National Parks and AONBs were designated, agricultural land management was largely in harmony with the conservation of these semi-natural habitats and, indeed, was the very cause of their creation. Yet, more recently, agricultural policy and practices have changed significantly and often to the detriment of nature. Wildlife diversity is decreasing and in turn, protected landscapes are failing to meet their full potential for ecosystem service delivery. This highlights the central role of the farming community in improving biodiversity supported by agri-environment approaches that promote environmentally favourable farming practices. (See our detailed comments in Q11)</p> <p>CPRE believes National Parks and AONBs should be exemplars in nature conservation and biodiversity and in the delivery of ecosystem services, becoming thriving, functioning, natural environments. The range of factors that has led to the lack of action in wildlife and ecosystem recovery has been highlighted in the Campaign for National Parks’ report <i>Raising the Bar</i> [i].</p> <p>Growing development pressure outside the boundaries of protected landscapes (and sometimes worryingly within) heightens the importance of their role in enhancing wildlife and supporting the recovery of natural habitats - they should be safe havens for wildlife. Increasing temperatures with climate change will continue to cause species to migrate north and to higher altitudes to keep within their tolerances, leading to increased competition exacerbated by invasive species. Combining this with smaller and increasingly fragmented habitats will continue to cause species isolation and wildlife decline. The challenge for protected landscapes, therefore, will be to lead the way in developing new approaches to conservation with a focus on large-scale habitat</p>
--	---

restoration and recreation, underpinned by the re-establishment of ecological processes and ecosystem services, as recommended by the Lawton report. **Essentially, CPRE believes that habitats need to be bigger, better managed and more joined-up.**

There have, of course, been significant successes enabled especially by agri-environment schemes, starting with the Environmentally Sensitive Areas (ESA) scheme introduced in 1987 and through co-operative schemes between private enterprise (primarily water companies) and the voluntary sector. These provide the starting point for much greater improvements.

All protected landscape Management Plans recognise the need for increased and better wildlife management but we believe these Plans could be more ambitious. They should identify areas needing urgent attention and set specific targets based on conservation and biodiversity enhancement. They should prioritise holistic landscape-scale habitat conservation and restoration, linking fragmented habitats, over individual species restoration plans. Once a Management Plan is in place for a protected landscape, the biodiversity objectives and targets should be monitored regularly to identify successes, and in the case of failures, adjustments should be made and implemented appropriately. There should be mechanisms in place to enable useful and positive cooperation between those charged with managing protected landscapes and their partners, and between the managing bodies themselves.

Agri-environment schemes and the close involvement of the farming community will be essential to achieving these goals. Leaving the EU provides the opportunity to create an effective and environmentally focused replacement to the CAP. Our natural environments deliver clean air and water, reduce flood risk, and increase carbon sequestration and biodiversity. The role of farmers and landowners in promoting these ecosystem services should be an important part of any new system of agricultural support, which should be attractive to join. (See our response to Q11 for our detailed view on farming) Along with suitable agri-environment schemes it is important to ensure other resources, in terms of funding and expert staff are available.

Recommendation:

- National Parks and AONBs should be exemplars of how to enhance wildlife and habitats, focusing on providing more, bigger, better managed and more joined-up habitats and landscapes. Ambitious targets should be enshrined in Management Plans and closely monitored to measure progress towards these goals.

[i] Campaign for National Parks, Raising the Bar, (2018):

	https://www.cnp.org.uk/news/raising-the-bar
<p>10. What views do you have about the role National Parks and AONBs play in shaping landscape and beauty, or protecting cultural heritage?</p>	<p>There are two aspects to answering this question - planning policy and the conservation and enhancement of the landscape fabric. For more on how development should be managed in designated landscapes, please see our response to Q14.</p> <p>Conserving and enhancing the fabric of the landscape</p> <p>Our National Parks and AONBs are a unique demonstration of the richness and diversity of the landscapes in England. This richness reflects the diversity of the underlying geology which is both complex and changes over very short distances. It is this ever varying geology which gives rise to the fundamental bones of our landscapes and to the diversity in fauna and flora (and farming). On these bones is imprinted our human history (mainly agricultural but also trading routes and rural land based industry) forming a record of development over time. An integral part of this diversity is the use of local materials in buildings and their architecture - this creates a symbiotic relationship with the landscape. The totality is our finest countryside in all its variety and forms of beauty. The National Park Authorities, AONB Partnerships and the AONB Conservation Boards play a critical role in understanding and documenting the specific landscape character(s) of the area for which they are responsible, identifying what is critical and must be preserved or enhanced and putting forward the strategies and guidelines to do so. An example is the Cotswold Conservation Board which provides a good exemplar in its Landscape Strategy and Guidelines[i] which are used when considering development and environmental projects.</p> <p>Whilst appreciation of landscape is often regarded as subjective and we perceive landscapes in our own way, there is considerable consensus about what makes a truly beautiful landscape: a variety of natural and cultural features, tranquillity and dark skies, thriving wildlife and extensive habitats, and a strong distinctive character - all characteristics typical of protected landscapes.</p> <p>Both National Parks and AONBs deliver for their landscapes. Their Management Plans cover the full scope of interests noted above and have detailed policies and priorities for the conservation and enhancement of the landscape. But, of course, as for biodiversity, appropriate delivery is significantly dependent on those managing the land, especially the farming community. This is covered in our answers to Qs 9 and 11. However, from a landscape perspective, it is very important that future agri-environment approaches support the conservation and reinstatement of features so important in upholding local distinctiveness, such as: distinctive boundary features, veteran trees, traditional orchards etc, and allow for the tailoring of special landscape projects to local</p>

circumstances and a changing climate.

It is also vital that there is the opportunity for different sectors (the conservation sector, land managers, local communities, utilities and the private sector) to work together to develop landscape-scale and special projects for defined features or areas that help deliver specific landscape priorities identified in the Management Plan. As just one example, the High Weald AONB 'Beautiful Boundaries' scheme, funded by National Grid, is working with ten landowners to plant 3km of new hedges, restore 5km of historic hedges, protect 5.5km of ancient woodland boundary and plant 230 trees to reinforce landscape character.

Duty to have regard: prioritising beauty

We recommend that greater emphasis should be placed on Section 62 of the Environment Act 1995 (for National Parks) and Section 85 of the Countryside and Rights of Way Act 2000 (for AONBs) which require any public authority or body that exercises functions on land within a National Park or AONB to have regard to their statutory purposes, with the primary emphasis on *conserving and enhancing their natural beauty*. This is the single statutory purpose of AONBs while in National Parks Section 62 confirms the primacy of their first purpose (concerning the conservation and enhancement of natural beauty) over that of the second purpose concerning recreation, where there is potential conflict (the Sandford Principle). We suggest that the weak 'duty of regard' be replaced with a 'duty of due regard' or a 'duty to further AONB or National Park purposes' which would provide all relevant bodies with a clear framework within which to operate. We believe that at the very least all public authorities or bodies, who have undertaken work within or close to protected landscapes, should be required to set out in their annual reports how they have contributed towards achieving the conservation and enhancement of natural beauty.

Recommendation: Strengthen the 'duty of regard' to become a duty of due regard or a duty to further National Park or AONB purposes.

Dark skies

Turning to a specific CPRE interest, our Night Blight mapping of Britain's night skies found that 59% of skies above England's National Parks are pristine, free of light pollution, along with 40% of AONBs. [iii] This shows that protected landscapes cover much of England's darkest skies and suggests that the designations are helping to protect these dark skies. The darkest National Park is Northumberland, with 96% of the area having pristine night skies and very little light pollution elsewhere. Even the comparably brightest AONB Cannock Chase has 47% of night skies falling in

	<p>the third darkest category and there is no severe light pollution, which shows it is an oasis of darkness for people to enjoy compared to the surrounding towns.</p> <p>Recommendation:</p> <ul style="list-style-type: none"> Encourage NPAs and AONBs to have policies in Management Plans and local plans to control light pollution and work towards Dark Sky status. <p>Heritage</p> <p>National Parks and AONBs are home to an enormous number of cultural heritage assets. For example, 41.4% of England's Scheduled Monuments, 27% of Registered Parks and Gardens, 17.4% of listed buildings, 91.6% of World Heritage Sites (obviously increased by the Lake District being awarded the status in 2017) and 14% of Registered Battlefields are within our current network of protected landscapes. [iv]</p> <p>Evidence shows that heritage is better protected in National Parks and AONBs than elsewhere. This is due to effective partnership working alongside local communities, landowners, owners of buildings and organisations such as English Heritage. The National Parks & Access to the Countryside Act 1949 places a responsibility to manage cultural heritage on National Park Authorities; but there is no equivalent duty for AONBs under the CROW Act. CPRE believes that AONBs can and often do play an important role in managing their area's cultural heritage, evidenced by the statistics above.</p> <hr/> <p>[i] Cotswolds Conservation Board Landscape Strategy and Guidelines: https://www.cotswoldsaonb.org.uk/our-landscape/landscape-strategy-guidelines/</p> <p>[ii] Experiencing Landscapes: Capturing the cultural services and experiential qualities of landscape (NECR024) http://publications.naturalengland.org.uk/publication/48001</p> <p>[iii] CPRE's 'Night Blight' mapping of Britain's night skies: https://www.nightblight.cpre.org.uk/</p>
<p>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?</p>	<p>As noted above, the landscapes that National Parks and AONBs seek to protect and enhance are shaped in great part by farming and, to a lesser extent, forestry practices. The character, special qualities and the healthy functioning of the land are largely dependent on agricultural management and, especially in the uplands, traditional forms of land management. The viability of farms as businesses, their profitability, but also their succession as family units become important elements in ensuring that particular forms of management continue - where suitable and/or culturally valuable - or can be adapted to secure better outcomes for the future (such as improved habitats for wildlife, restored landscape features, and lower flood risk). Continuity of management is</p>

	<p>essential for sustaining the cultural traditions of protected landscapes, including retaining traditional rural skills and deep knowledge of the land and of livestock, as well as of nature. The management of common land is of particular importance in these areas for biodiversity and other valuable public benefits.</p> <p>The designation of landscapes is insufficient on its own to conserve their character, beauty and functionality. Appropriate land management is required. National Parks and AONBs benefit from having their own Management Plans but delivery of objectives for the farmed landscape is vitally dependent on the support of farmers, land managers and owners. NPAs and AONBs lack the policy levers or levels of funding needed to reward those who manage the countryside appropriately. They do, however, play a facilitatory and/or advisory role, working with farmers/land managers in varying ways. They can play a crucial and very effective collaborative and co-ordinating role in encouraging, supporting and advocating on behalf of local rural businesses.[i]</p> <p>Less noted but relevant here is the role planning within designated landscapes can play in supporting appropriate farm diversification, to maintain the viability of local farm and traditional woodland businesses and support local economic activity.</p> <p>Reform to farm payments heralded by the new agricultural policy (and linked to the 25-Year Environment Plan) represents a major opportunity to move away from the specialised and intensive farming that the CAP has fostered, towards rewarding farming that is much better integrated with environmental objectives and a wider set of public benefits. Without a better model of support intense price pressure and the demands of unforgiving supply chains mean harmful practices will continue. There is scope for better soil management, in particular to address excess nutrients and erosion which in turn damage sensitive water courses. Equally, while many farmers and landowners value the special qualities of the areas they live in and farm, the pressure on farm margins means they cannot always afford to maintain landscape features such as dry stone walls without funding and support for development of the requisite skills.</p> <p>For protected landscapes there is a significant opportunity to ensure public investment in farming is better aligned and integrated with their statutory purposes. So, while farmers and land managers have a central role in changing over to sounder land management, NPAs and AONBs could and should play a stronger leadership role in promoting good farming practice in their areas. This leadership - and their role in disseminating expertise, and developing networks and partnerships - will be even more crucial in a time of change and uncertainty for the land-based sector. National Parks and AONBs should become exemplars for environmentally (and financially) sustainable management of the</p>
--	--

wider countryside. This will also mean taking a broad perspective which can reflect the need to develop wholly sustainable forms of land management to cut environmental harm, considering the special qualities of the area and the needs of local communities and managing potential conflicts and trade-offs between these objectives.

Recommendations:

- The Government should ensure that landscape conservation and enhancement is a core objective of the new Environmental Land Management scheme (ELM) and is recognised as a public good for the purposes of public funding
- Development of the ELM should ensure expertise from NPAs and AONBs is incorporated into the design of both universal and targeted levels for their area, picking up on points raised in answer to Qs 9 and 10. In this respect, and given their importance to large tracts of the countryside, NPAs and AONBs must be included in the test/trial and piloting phases of the new ELM. Support for this has come from the recent National Association for AONBs proposal to use AONBs as test beds for the ELM. [ii]
- There is a strong case for design and delivery of the ELM for their areas to be formally delegated to National Park and AONB bodies. As an integral element, adequate funding should flow to the designated landscape bodies to build their capacity to properly carry out these new functions. In particular, there may be a need to add to their expertise or replace that lost through recent cuts. This role could include:
 - acting as managing authority for agreeing contracts with land managers (this may be more practical within National Parks).
 - a formal advisory role working with land managers to develop farm/landscape-based plans for delivery of public goods.
 - instigating and working in partnership to develop special projects to meet particular objectives for the landscape, biodiversity and cultural heritage of the protected landscapes (e.g. through major habitat restoration schemes).

As a minimum they should be a statutory consultee on plans for their area or part of their area, depending on final geography chosen for ELM delivery (catchment, National Character Areas etc).

We also recommend that Natural England's National Character Areas (NCA) should be considered as the appropriate geography for ELM scheme delivery. The NCA Profiles provide an established

	<p>England-wide spatial framework for identifying opportunities for environmental enhancement and targeting spending to improve outcomes. They are underpinned by a landscape approach which would maximise the synergies that could be delivered by scheme spending and ensure activities are appropriate to enhance landscape functions and character.</p> <p>Post-Brexit policy will also see wider rural development funding change. NPAs and AONBs should have an important - and mandated - role to play as Board members of and working collaboratively with Local Enterprise Partnerships (LEPs) to ensure that (a) sufficient resources are available for rural development that underpins National Park and AONB purposes and the objectives of their Management Plans; (b) that LEPs take full account of these purposes and objectives in formulating their own Strategic Economic Plans.[iii]</p> <p>This collaboration could support rural skills training, apprenticeships and work experience, improved supply chain infrastructure and initiatives to add value to products from sustainable land management activities. Successful farming and sensitive land management should be integrated with products and services, including recreation and access that connect the public to these cherished landscapes. The potential should also be explored for LEPs to delegate funds to designated landscape bodies to enable them to support rural development for their areas, including appropriate investment in their capacity.</p> <p>We recommend that the development of the Environmental Land Management scheme should ensure that:</p> <ul style="list-style-type: none"> • Expertise from NPAs and AONBs is incorporated into the design of both the universal scheme, and where it is targeted for their area; • Delivery of the scheme within their areas is delegated to NPAs and AONBs with an appropriate transfer of funding to ensure they have the capacity and additional expertise to play a key role in the delivery of the scheme. <hr/> <p>[i] An example is the High Weald's EU funded LEADER land management scheme http://www.highweald.org/look-after/land-management/grants.html</p> <p>[ii] NAAONB: http://www.landscapesforlife.org.uk/wp-content/uploads/2018/09/Farming-for-the-Nation-AONBs-as-test-beds-for-a-new-Environmental-Land-Management-Scheme-FINAL.pdf</p> <p>[iii] CPRE, Next steps for LEPs: How greater transparency and accountability would help Local Enterprise Partnerships to support a thriving countryside. (June 2018) https://www.cpre.org.uk/resources/housing-and-planning/item/4894-next-steps-for-leps</p>
12. What views do you	CPRE believes that National Parks and AONBs are cornerstones to providing access to the countryside for everyone. Access and

<p>have about the role National Parks and AONBs play in supporting and managing access and recreation?</p>	<p>recreation, a statutory purpose of National Parks and AONB Conservation Boards, must be a priority for support from NPAs, Conservation Boards and government. Governmental support is vital in this under-resourced area as part of a much-needed initiative to improve affordable and sustainable transport in rural areas.</p> <p>‘Getting there’: CPRE supports the Campaign for National Parks’ (CNP) approach. We hope that National Parks and AONBs will see a sustainable increase in visitors that does not detract from the quality of the landscape which attracts people in the first place. Currently, limited transport options mean visitors rely heavily on cars, with high traffic volumes having a negative impact on tranquillity and the natural environment, and on the ability of local people and businesses to get around. Providing improved and integrated alternatives to the car would bring many benefits: the opportunity for those without a car to enjoy these protected landscapes (See our response to Q14); the social and wellbeing benefits of access to nature; and the protection of the special qualities of these landscapes through reduced emissions, noise pollution, and traffic congestion. For example, the Coasthopper bus service along the north coast of Norfolk Coast AONB provides relief to the vehicles on the A149, and encourages walkers to visit different parts of the coast on foot. This is especially pertinent to CPRE’s calls for better sustainable public transport links to all rural communities. Any integrated transport system must account for the needs of local people as well as tourists.</p> <p>Footpaths should be extended and maintained to ensure suitable terrain for all ages and abilities, through initiatives such as the South Downs National Park’s <i>Miles without Stiles</i> project [i].</p> <p>Accommodation: National Parks and AONBs should encourage and promote a balanced mix of accommodation providers that are affordable to a wide range of visitors, located such that they do not have detrimental impacts on the landscape and wildlife. They should use their influence to ensure that anyone can experience these landscapes, regardless of their socio-economic background. (See our response to Q17)</p> <p>Recommendations:</p> <ul style="list-style-type: none"> • National Parks and AONBs should work to ensure that there are adequate plans in place for sustainable public transport to enable easy ‘access for all’ to these landscapes, as well as affordable accommodation. • A range of affordable accommodation that enhances and protects landscape character and wildlife should be created or renovated to make these landscapes accessible. • Outreach programmes should ensure equal opportunities
--	--

	<p>for access by people of all incomes and backgrounds. (see Q17)</p> <ul style="list-style-type: none"> • A network of accessible, hard surface, stile-free paths that are disabled and wheelchair-friendly should be created. <hr/> <p>[i] Miles Without Stiles, South Downs National Park Authority: https://www.southdowns.gov.uk/enjoy/walking/miles-without-stiles/</p>
<p>13. What views do you have about the way National Park and AONB authorities affect people who live and work in their areas?</p> <p>a) Are they properly supporting them and what could be done differently?</p>	<p>National Park Authorities potentially have a greater effect on people who live and work in their area, compared to AONBs, both positively and negatively. This is because they work across the whole area of the protected landscape, and offer a single planning authority, significantly more staff, more financial resources and a second recreation purpose. They also have a duty to foster the economic and social wellbeing of their communities. There is much evidence of how National Parks benefit their communities and rural economies. [i]</p> <p>We do recognise that there can be particular challenges to living and/or working in a National Park, including housing affordability (see our answer to Q14), congestion, tourism pressure - often linked to a seasonally based economy (this is also the case in many AONBs) and that planning authorities may sometimes reject applications which would provide social and economic development.</p> <p>However, many NPAs successfully deliver appropriate development in partnership with local communities, and best-practice in such partnership approaches should be shared and encouraged. There are plenty of examples of where NPAs have successfully fostered the delivery of well-designed affordable housing. In Grasmere in the Lake District National Park, a development of 12 affordable homes, cross-subsidised by 3 market properties, was completed at Broadgate Orchard in 2014. [ii] Built using local materials in keeping with the local vernacular, these homes offered a lifeline for the village, which had not seen any new affordable homes built in over thirty years. In April 2018, the Peak District National Park Authority approved the largest development of affordable homes in the National Park to date. [iii] Thirty new affordable homes will be built in Bakewell, on a site which currently forms part of the grounds of Lady Manners School, funded by a £500,000 grant from Derbyshire Dales District Council. The homes are explicitly aimed at meeting the housing needs of young families and single people in the community.</p> <p>There are important examples of how NPAs work in a close and positive relationship with their communities, such as the South Downs National Park whose area includes many vibrant towns and villages and a diverse and vigorous business economy. The SDNP</p>

	<p>worked closely and productively with communities in preparing its Local Plan and facilitated over 50 Neighbourhood Plans and similarly promoted community engagement in the development of its Management Plan.</p> <p>National Parks and AONBs are strong brands that offer considerable social and economic opportunities for people who live and work in these areas, and can contribute towards thriving rural communities:</p> <p><u>Branding and business:</u> There are more than 85,500 businesses, from all sectors of the economy, located in England's National Parks and AONBs. Being in a protected landscape is a unique branding opportunity for a wide range of products such as food and drink, woodcraft and other skilled crafts, as well as tourism, cultural events and access opportunities. The Surrey Hills AONB, for example, has a trade mark providing members with a recognised visible endorsement of local provenance and quality. In the Cotswolds AONB, there is a high concentration of micro businesses and Cotswolds District has a local economy which grows more strongly than the rest of Gloucestershire as a whole.</p> <p><u>Dark skies:</u> Many protected landscapes are making the most of their dark skies to draw new visitors into their area, known as 'astrotourism', and are providing a year-round attraction for people to view a truly dark starry sky. This means there are opportunities for businesses in these areas to generate additional income by providing services such as accommodation, dining and dark sky tours in what was traditionally 'out of season'. Some National Parks and AONBs are working towards Dark Sky status, awarded by the International Dark-Sky Association. National Parks with Dark Sky status include Exmoor, Northumberland and the South Downs, while Cornwall AONB has recently been awarded Dark Sky Landscape status for Bodmin Moor. There is also a network of Dark Sky Discovery sites across the UK which helps local people, visitors, schools and groups to enjoy the night sky - there are many of these within England's National Parks and AONBs. [iv]</p> <p><u>Rural skills:</u> Protected landscapes, especially National Parks, also have a tradition of encouraging apprenticeship schemes in skills that will help shape the future of the area.</p> <p>Indeed, as businesses thrive in National Parks and AONBs, there is a need for a rapid and significant improvement in digital connectivity within these areas to assist rural residents and businesses, to attract new types of internet-dependent business into rural locations and reduce the need for travel.</p> <p>We recognise that the existing duty on National Parks, and Conservation Boards, to foster the economic and social well-being of local communities does not enable NPAs to commit additional resources to these activities and gives them no powers. It often</p>
--	--

	<p>relies on partnership working as the main means of delivering this duty.</p> <p>CPRE suggest a more appropriate approach may be to retain the current duty but to adopt the wording of one of the aims of AONBs, namely, <i>“to take account of the needs of agriculture, forestry and other rural industries and of the economic and social needs of local communities. Particular regard should be paid to promoting sustainable forms of economic and social development that in themselves conserve and enhance the environment”</i>. This wording more overtly links the duty with the delivery of the first and second purposes in National Parks.</p> <p>Regardless of current wordings discussed above, the Management Plans of both National Parks and AONBs do identify policies and actions to support economic and social activities which in themselves contribute to the conservation and enhancement of natural beauty. For example, the Surrey Hills AONB Management Plan 2014-2019 has an overarching aim that: <i>‘The Surrey Hills should be an attractive, affordable and sustainable place to live, work and enjoy for all members of the local community’</i>. The issue therefore is more one of delivery than intent, re-emphasising the importance of partnership working (see the answer to Q11).</p> <p>It is inevitable that there will be calls for the statutory purposes of these landscapes to be reconsidered. Yet we feel that there is a risk changes could, unintentionally, undermine the long standing existing purposes of these nationally important landscapes.</p> <p>A key argument often cited at the local, and occasionally national level, is that the onus should be on National Park Authorities to support the economic and social well-being of local communities and that this should become a third statutory purpose. This reflects the more recent Scottish legislation for National Parks which has an additional statutory purpose ‘to promote sustainable development’. We would strongly oppose the introduction of this in England, as it could undermine the first two purposes as ‘sustainable’ has become such a ubiquitous term.</p> <hr/> <p>[i] Cumulus Consulting for National Parks England, Valuing England’s National Parks (2013) http://www.nationalparksengland.org.uk/_data/assets/pdf_file/0004/717637/Valuing-Englands-National-Parks-Final-Report-10-5-13.pdf [iii] http://www.lakedistrict.gov.uk/planning/local-plan-review/affordable-housing [iii] https://www.peakdistrict.gov.uk/learning-about/news/current-news/affordable-homes-approved-for-bakewell-by-peak-district-national-park-authority [iv] Dark Sky Discovery Sites: http://www.darkskydiscovery.org.uk/</p>
14. What views do you have on the role	CPRE believes in access to National Parks and AONBs, both in terms of sustainable public transport options which allow visitors to

<p>National Park and AONB authorities play on housing and transport in their areas?</p>	<p>access our most beautiful landscapes without a car, and through the provision of truly affordable homes to ensure that housing costs do not force low income households out of these areas.</p> <p>Transport</p> <p>Visitors to National Parks currently rely overwhelmingly on private cars to get around, with 93% of journeys made by car.^[i] Better sustainable transport provision would enable a wider cross-section of society to access designated landscapes, as well as combating isolation among those without cars in communities within protected landscapes, currently exacerbated by the closure of local shops and services and a reduction in public funding for bus services. Furthermore, a shift towards sustainable transport options will bring significant environmental improvements, from carbon savings to enhanced tranquillity and darker skies, and a reduction in visual intrusion.</p> <p>A large array of bodies currently influence transport provision in National Parks and AONBs, including Local Transport Authorities, LEPs, bus and train operators and tourism attractions. More integrated thinking is required to ensure a coordinated approach to delivering sustainable transport options in these areas. This Review should consider how to ensure a greater strategic role NPAs and AONB bodies in improving sustainable transport provision to and around their areas, allowing them to work with local partners to identify improvement opportunities and secure the necessary funding from appropriate bodies.</p> <p>Major road developments: The government's 2014 Road Investment Strategy (RIS) proposed several major roads in National Parks. In particular, the proposed Arundel bypass risks harming swathes of the South Downs National Park and would set a dangerous precedent for damaging development in protected landscapes. Furthermore, our research has found that, far from providing congestion relief, building more and bigger roads simply increases traffic. ^[ii] Where development does take place within protected landscapes, sustainable transport provision should be considered alongside housing in order to avoid car dependent developments.^[iii] In any event, when developing projects in National Parks or AONBs, Highways England or other agencies should have full backing from local communities that the project meets a pressing need, and that the routing and design of any scheme works with the landscape to minimise adverse effects and has sufficient budget to maximise mitigation.</p> <p>Affordable Housing</p>
---	--

New housing development in National Parks and AONBs should focus on meeting identified need for truly affordable homes to support local communities. These might be to house existing residents who are currently trapped in overcrowded or unsuitable accommodation, or to meet the needs of people doing low paid but vital jobs that keep rural communities viable, such as care workers. In most cases, homes will need to be offered for a range of tenures, including shared ownership, affordable rent and, crucially, social rent.

We therefore support the ambition of National Park Authorities who choose to prioritise the provision of affordable housing in their local plans, such as the South Downs National Park Authority. [iv] All planning authorities responsible for protected landscapes should encourage the use of the Rural Exception Site policy to facilitate the development of affordable homes to meet local need on sites which would not normally be granted residential planning permission. Affordable homes built in these areas should be subject to perpetuity requirements, to ensure that they are not sold on as open market housing in the future.

Local planning authorities should also be empowered to demand on-site affordable housing contributions on all sites, including developments of 5 homes or fewer. At present, planning policy prevents authorities in designated landscapes from seeking affordable housing contributions on sites of 5 homes or fewer. Yet many developments in National Parks and AONBs are on very small sites. The threshold thus places a severe constraint on affordable housing delivery in these areas.

Affordability pressures are further exacerbated by very high levels of second and holiday home ownership in many designated landscapes. Ten years ago, the Lake District National Park Authority estimated that the sustainability of rural communities is compromised once the proportion of second homes rises above 20%. [v] Yet in dozens of communities in our most picturesque landscapes the percentage is now far higher. In the Lake District village of [Coniston](#), for example, 51% of properties are second homes or holiday lets, while a third of all homes sold in [North Norfolk](#) district last year were second homes. [vi] [vii]

CPRE supports the ability of local authorities to levy up to 100% council tax on second homes, to ensure that second home owners are contributing to local services. However, the present Review also offers a golden opportunity to consider how planning powers might be used to prevent communities in National Parks and AONBs from being saturated with second homes.

Planning in AONBs

National Parks and AONBs have the shared statutory purpose of conserving and enhancing natural beauty, and both are accorded the highest level of protection from development in the revised NPPF (para 172). However, National Parks have their own independent planning authorities, whereas planning functions in AONBs remain with the constituent local authorities. Among other challenges, this means that local planning authorities with AONBs in their area are usually required to meet the Government's housing targets in full, based on a standard method for calculating a 'local assessment of housing need', while National Park Authorities are free to adopt locally set targets which take environmental considerations into account.

CPRE argues that any review of protected landscapes cannot ignore this disparity. In theory these landscapes have an equal level of planning protection but in practice AONBs are often the poor relation, subject to national and local pressures affecting individual local authorities. Although a statutory 'Duty of Regard' exists, requiring relevant authorities to take into account the statutory purposes of designated landscapes when making planning decisions, it is difficult to enforce and often ineffective in preventing inappropriate development in AONBs. We believe that this must be addressed, as National Parks and AONBs are of equal importance in the national value of their landscapes. (For more on the 'Duty of Regard', please see our response to Q10). In addition, AONB Management Plans are adopted by local authorities but their implementation is not mandatory. We believe that AONB partnerships should become statutory consultees on any significant planning application that would affect the AONB or its setting.

In particular, it is essential that the NPPF and online planning practice guidance are amended to explain how LPAs/NPAs should reduce their local plan housing requirement from the objectively assessed need figure, to account for the requirement to 'restrict the overall scale, type or distribution of development' in line with the NPPF para 11.b.i. At present, LPAs are sometimes under the impression that unmet housing need can be used as part of the exceptions test to allow major development within an AONB. We would like more specific guidance that this is not the case.

We understand that the Panel has read CPRE's *Beauty Betrayed* report, which found that 15,485 housing units were approved in AONBs between 2012 and 2017, with eight AONBs accounting for 74% of all housing applications and 69% of all housing units in AONBs during this period.[viii] The research that underpins this report included a qualitative survey of AONBs and CPRE groups to find out their views on planning in AONBs. Only 20% of AONB staff felt that they are always listened to by the local planning authorities in their areas, with 80% reporting they were sometimes listened to.

	<p>Respondents identified a clear need for greater strategic planning in AONBs, to fully recognise and respond to the AONB designation.</p> <p>CPRE believes that a more holistic approach to planning in AONBs is needed, to reduce their vulnerability to speculative and unsustainable development. We recommend that, in AONBs with two or more constituent planning authorities, which would apply to the majority (29 of 34), LPAs should be obliged to coordinate with one another to produce a set of specific area-based policies which must then be adopted in each of their local plans. The purpose of these policies would be:</p> <ol style="list-style-type: none"> 1. To set out the criteria for developments that will be supported e.g. affordable housing meeting identified local need, developments which are essential for the economic viability of activities and the criteria for development which will ensure the conservation of the landscape, heritage and biodiversity of the AONB or the enjoyment of these. 2. To highlight developments that are inappropriate within the AONB context, including their setting, and emphasise that such developments will remain inappropriate even if the LPA is failing to meet the total 5-year housing land supply for the district. 3. To link, if relevant, to key policies in the AONB Management Plan. 4. To link to AONB design guidance if available. 5. To promote sustainable highly energy-efficient designs. 6. To promote small-scale domestic and community renewable energy generation and storage, in keeping with the landscape. <p>This would begin to align the English AONBs with the IUCN Guidelines for land use planning, within Category V protected landscapes (which covers all English National Parks and AONBs): 'Land use plans for [Category V] protected landscapes should reflect their special needs. They should cover all the Category V protected areas in one plan and ensure there are strong land use policies for all sectors that help to safeguard the special qualities of the protected area'.</p> <p>There are several possible options for how the proposed policies could be set out, including an Area Action Plan (AAP) or a single joint plan covering all of the LPA areas (AONB and non-AONB), which would enable a sensible spatial distribution of development. It might sometimes be appropriate for the AONB Partnership or Conservation Board to propose and lead discussions with the constituent LPAs. Because AONBs are so different, however, and the relationships between AONBs and their LPAs vary so much, we do not recommend a one-size-fits-all approach. Different options are likely to be appropriate for different AONBs.</p>
--	---

	<p>Recommendations:</p> <ul style="list-style-type: none"> • National Park Authorities and AONB bodies should take a greater strategic role in ensuring integrated transport to and around their areas. This should involve increased collaboration with local partners to identify and promote sustainable transport access to these landscapes and to secure necessary funding. • New housing development in National Parks and AONBs should focus on meeting identified need for truly affordable homes to support local communities. • AONBs with two or more constituent planning authorities should have a consistent set of specific area-based policies, adopted by all the constituent planning authorities in their local plans. • AONB partnerships should become statutory consultees on any significant planning application that would affect the AONB or its setting. <hr/> <p>[i] National Parks. Tourism. http://www.nationalparks.gov.uk/students/ourchallenges/tourism</p> <p>[ii] CPRE Report. The end of the road? Challenging the road-building consensus. March 2017. https://www.cpre.org.uk/resources/transport/roads/item/4543-the-end-of-the-road-challenging-the-road-building-consensus</p> <p>[iii] Transport for New Homes: Project Summary and Recommendations. July 2018. http://www.transportfornewhomes.org.uk/wp-content/uploads/2018/07/transport-for-new-homes-summary-web.pdf</p> <p>[iv] South Downs National Park Authority. Affordable Housing Background Paper: South Downs Local Plan. September 2017. https://www.southdowns.gov.uk/wp-content/uploads/2017/10/SS_Affordable-Housing_Ap_1_Paper.pdf</p> <p>[v] Lake District National Park Authority. Review of Second Home Data and Assessment of the Effects Second Homes are Having on Rural Communities. 2008. http://www.lakedistrict.gov.uk/_data/assets/pdf_file/0005/410873/Review-of-second-home-data-and-assessment-of-effects-on-rural-communities.pdf</p> <p>[vi] https://www.nwemail.co.uk/news/17226820.district-is-off-track/</p> <p>[vii] https://www.northnorfolknews.co.uk/news/norman-lamb-criticises-shocking-rise-second-homes-bought-north-norfolk-1-5744901</p> <p>[viii] CPRE Report. Beauty betrayed: How reckless housing development threatens England's AONBs. November 2017, p.3. https://www.cpre.org.uk/resources/countryside/landscapes/item/download/5199</p>
<p>Part 3 – Current ways of working</p>	
<p>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?</p>	<p>National Parks</p> <p>CPRE believes that the current governance structure of National Park Authorities is fit for purpose. It is vital for the national interest to remain at the core of governance decisions:</p> <ul style="list-style-type: none"> • The independence of NPAs is important for the representation of national statutory purposes and their implementation within each local context;

- Full funding from central government allows for the flexibility and capacity in order for NPAs to uphold National Park purposes;
- NPAs' role as planning authorities further supports this aim and CPRE believes the current arrangement serves National Parks well, while suggesting that NPAs should take account of the needs of local communities and those trying to foster businesses that underpin the first and second purposes (see response to Q13)

AONBs

We believe, however, there is more room for improvement in the case of AONB governance. Whilst AONB partnerships are under-resourced to fulfil their current role, CPRE is concerned that any major reorganisation could exacerbate this situation. AONBs are nationally important landscapes, rooted in their local context, and their governance is distinct from NPAs.

The Conservation Board model has been successful in the Chilterns and Cotswolds AONBs. For example, in the Cotswolds this has elevated both the profile of the AONB and that of the Board. The Board became able to challenge local authorities with conviction and effect: this raised its credibility with other stakeholders. We therefore believe that the possibility of more AONBs becoming Conservation Boards should be explored as part of this Review.

However, the management structure for many AONBs is typically such that those responsible for an AONBs management, whether at Board or operational level, have no more than an advisory say in respect of planning decisions taken by a LPA (see our response to Q14). This means that AONBs often fail to meet their protective goals. It also lacks transparency, and is economically wasteful by reason of duplication, diversion and disparity of effort: expense that could much more profitably be applied to boost AONB budgets.

To this end, **CPRE recommends** strengthening governance of AONBs by:

- Allowing AONBs greater independence from their local authorities, which could be achieved by nationally appointing a proportion of AONB Board members to reflect the national importance of these landscapes.
- Supporting flexible and locally appropriate models of governance, such as Conservation Boards, to ensure that AONBs are managed most effectively.
- Granting AONB partnerships a legal status and a statutory duty to implement Management Plans with associated scrutiny and accountability, requiring constituent local authorities to ensure they are appropriately referenced in

	<p>local plans.</p> <ul style="list-style-type: none"> • Recognising and supporting the AONB teams in their areas and the important role of AONB partnerships in providing specialist advice into the planning process.
<p>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?</p>	<p>Generally the experience of our Network is that NPAs, Conservation Boards and AONBs are accessible and willing to work:</p> <ul style="list-style-type: none"> • Formally with local authorities who are represented on the board. • Informally with other environmental organisations in the area. • With individuals when they bring problems to the officers. • With farmers/landowners and individuals when mounting a project or running a training course. • Through open consultation exercises when preparing documents, in particular Management Plans. <p>However, this interaction tends to be derived from a specific need or project. This is, perhaps, understandable for AONBs with limited resources. We would encourage the Review to promote more general engagement with local communities and working with other groups in their local voluntary sector.</p>
<p>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?</p>	<p>Involving people from all parts of society</p> <p>National Parks and AONBs are held in trust for the nation, free for all to access, and this must remain the case as the population changes. Efforts to engage people from all parts of society are therefore essential and must be enhanced. The Review should also recognise the challenges of increased visits to areas where infrastructure is particularly pressurised by high levels of tourism. This must, therefore, be managed sustainably.</p> <p>It is particularly important to increase access for young people. The challenges of access to protected landscapes are demonstrated by Natural England's Monitoring Engagement in the Natural Environment (MENE) survey, which showed that 12% of children had no engagement with the natural environment at any level in 2014/15. There is stark variation by ethnicity, socio-economic status, and region, with 'frequent' engagement reported for just 56% of children from Black, Asian and Minority Ethnic (BAME) households, 65% of lower-income households, and similar scores in areas dominated by conurbations - sometimes despite the proximity of a National Park or AONB.[i]</p> <p>Research from CNP showed some increased use of local green space following visits to a National Park. [ii] Such experiences are clearly crucial to improving engagement with the natural world, demonstrated by MENE data which shows a correlation between</p>

levels of parental engagement with nature and the likelihood of their children engaging. This demonstrates the necessity of the ambitions in the Eight-Point Plan for National Parks to increase school visits, and the 25-Year Environment Plan to bring children closer to nature, particularly those from disadvantaged backgrounds.[iii] [iv]

To take a step towards improving and normalising access and participation in designated landscapes, CPRE **recommends**:

- A bold ambition for every child to visit a designated landscape through a school visit before the age of 11.
- Opportunities throughout the curriculum to learn about the physical, historic, social and cultural contexts which led to their designation and created their unique character.
- Share, support and adequately resource best practice engagement projects with BAME communities, such as the Mosaic Model of recruiting ‘community champions’, and helping organisations improve outreach activities.
- Outreach activities should be targeted toward schools in areas with poorer representation of ‘outdoor classroom’ activities, with specific opportunities for residential visits for schools from poorly represented areas. These opportunities must come with details on how to access them by public transport and offer fair allocation of residential opportunities, for example to YHAs, when necessary. Such trips should prioritise visiting the closest National Parks or AONBs, but we recognise not all areas of the country are well served by the existing network.
- Reinstate MENE research with children to establish a baseline from which to measure the success of future policies.

Finally, NPA and AONB memberships are not generally representative of the population. They must lead the way in involving people from all parts of society, appointing designated outreach and diversity champions. Board members should seek to encourage a broader range of people to apply for nomination.

Encouraging volunteering

Significant numbers of volunteering activities are provided by NPAs, AONBs and third sector organisations. These tend to focus on ecological or conservation work. However, some authorities offer opportunities to support local communities, such as driving a community minibus. Such opportunities reflect vital local needs, and may offer some solutions to challenges of rural isolation and loneliness.

Recommendation:

- Voluntary activities that serve local communities should be extended in all National Parks and AONBs, with

management bodies operating as leaders and coordinators of volunteering activities to strengthen community-wellbeing. This should include sharing best practice on hosting and disseminating volunteering opportunities organised by NGOs and community groups.

Improving health and wellbeing

CNP has demonstrated significant health and wellbeing benefits from time spent in National Parks, with 'definite links' to personal improvements resulting from the excellence of the environment, with respondents feeling healthier and more positive.[v] This should be embraced and promoted. More broadly, research has repeatedly shown the benefits for mental and physical health linked with time spent in natural surroundings.[vi]

Recommendations:

- The 2017 accord between National Parks England and Public Health England, should be extended to cover AONBs, with best practice in social prescribing shared to establish ties between designated landscape access schemes and NHS Trusts.
- Specific support should be provided by NPAs and through the new Environmental Land Management Scheme (ELMS) to improve access to farms and the general countryside, and to enhance the features that deliver particular benefits to health and wellbeing, such as tranquillity, dark skies, cultural heritage and landscape beauty.

There is also potential to provide societal benefits through land management approaches which improve air and water quality, produce high quality and healthy food, and sequester carbon to mitigate climate change.

Recommendation:

- ELM contracts should consider benefits holistically, with a strategic approach to land use, identifying opportunities to deliver multiple benefits, while supporting and enhancing the beautiful, functioning landscapes which make designated landscapes valuable in the first place. (See our response to Q9 and Q11)

[i] Monitor of Engagement with the Natural Environment: a pilot to develop an indicator of visits to the natural environment by children. February 2016.

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/498944/mene-childrens-report-years-1-2.pdf

[ii] Wilson, S. Investigating the impact of National Parks on Health and Wellbeing. May 2014.

<https://www.cnp.org.uk/sites/default/files/uploadsfiles/140530%20Impact%20of%20National%20Parks%20on%20Health%20and%20Wellbeing.pdf>

[iii] Defra. 8-Point Plan for England's National Parks. March 2016. p7.

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/498944/mene-childrens-report-years-1-2.pdf

	<p>chment_data/file/509916/national-parks-8-point-plan-for-england-2016-to-2020.pdf</p> <p>[iv] HM Government. Our Green Future: Our 25-Year plan to improve the environment. 2018. p71. https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/693158/25-year-environment-plan.pdf</p> <p>[v] Wilson, S. Investigating the impact of National Parks on Health and Wellbeing. [vi] Williams, F. This is Your Brain on Nature. <i>National Geographic</i>. January 2016. https://www.nationalgeographic.com/magazine/2016/01/call-to-wild/</p>
18. What views do you have on the way they are funded and how this might change?	<p>Cuts of up to 40% in real terms to National Park Authority funding in England have led to hundreds of job losses and a huge reduction in the services they are able to provide, such as the closure of or reductions in public transport services, the closure of information centres, a reduction in work to maintain the rights of way network and a halt to many NPA projects on climate change, flood defence and conservation.</p> <p>Despite AONBs having the same nationally important landscape quality and covering 15% of England, they are woefully under resourced. For example, the 34 AONBs get 75% funding from Defra which recently totalled £6.2 million whereas the ten English National Parks received £44.7 million in 2015/16 - although this is still a reduction since 2010/11.</p> <p>CPRE believes that AONBs should be appropriately funded and resourced so that they can be strong champions for their protected landscape and to perform the enhanced role envisaged in this submission. There should be a longer term commitment to funding so that AONBs can plan over the long term. We do recognise that Government budgets are pressured but would argue that the budget for AONBs should be increased in recognition of their value to people, planning, the landscape and wider environment. We support investigations into bold and innovative approaches to raising funds, such as Government-matched donation systems. It may also be possible to raise funds through a second-home levy (see our response to Q14) or tourism contribution. An example of an innovative approach is the Norfolk Coast Partnership which is actively involved in sourcing funding for projects, from small and community based to the large and ambitious. The AONB boundary chops the areas two main north-south chalk rivers in half, but based on the integrity of river systems, a successful bid was made for the Defra Catchment Restoration Fund (CRF). The award was £1.3 million for the Nine North Norfolk Chalk Rivers Project.</p> <p>National Parks and AONBs are a vital resource for the nation thus long term funding should be planned, with the funding model for AONBs being significantly improved in recognition of their cultural and landscape value and to people's health and wellbeing. Indeed, these landscapes will play an increasingly important role in delivering the 25-year Environment Plan, the new ELMS, mitigation and adaptation to climate change, sustainable rural communities</p>

	<p>and high quality landscapes that are accessible to all. Given the higher cost effectiveness of preventative action, in terms of both health and climate change, there is a strong argument for proper funding providing national savings in the medium and long-term.</p> <p>Recommendations:</p> <ul style="list-style-type: none"> • Funding for AONBs should be reviewed so that they are appropriately resourced in the future, in recognition of their importance to the nation. • National Parks should be adequately resourced by central government for the vital job they do, in a way that benefits their communities and other stakeholders, including farmers, land managers, businesses and voluntary societies.
<p>19. What views do you have on the process of designation - which means the way boundaries are defined and changed?</p>	<p>The current process for designation is long-winded, forensic and could be more efficient. While of course there needs to be a thorough and consistent process and consultation, and a high bar for potential new National Parks or AONBs to reach, there must be a way to streamline the process. In recent years there has been an inconsistent approach by Natural England to calls for evidence for new designations. This has been in an effort to refine their 'known designation shortlist'. But the lack of both staff and financial resources has meant that their Board has not been able to pursue significant new designations since the New Forest and South Downs National Parks. It could be argued that Natural England's approach has lacked transparency as calls for evidence to substantiate cases for designation have been sent directly to people or groups who have enquired previously.</p> <p>This Review is an opportunity to consider how to adjust the designation process so that areas, their communities and visitors can benefit from any new designations sooner.</p> <p>Recommendation:</p> <ul style="list-style-type: none"> • There should be a clear, collaborative, transparent and consistent process for prioritising and pursuing new designations.
<p>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</p>	<p>We do recognise that with our existing National Parks and AONBs covering almost 25% of England, there are concerns that further designations will put more development pressure on the wider countryside. The existing planning difficulties in counties which are largely AONB could also be exacerbated.</p> <p>Yet this is a golden opportunity to make a strategic assessment of where new designations could protect landscapes which are important nationally, or where their future could be better served by</p>

<p>or those near built-up areas</p>	<p>a change in status.</p> <p>Designation proposals</p> <p>Several CPRE county groups will be making their own submissions to the call for evidence about areas that they wish to be considered for either new designations or changes to existing ones. It is our view that the county CPRE groups are best placed to make the case for designation proposals in their areas.</p> <p>There are some areas which would be considered as ‘unfinished business’ from the original Hobhouse report in 1947, these include:</p> <ul style="list-style-type: none"> • The Forest of Dean as an AONB • The Herefordshire Black Mountains as an AONB • Breckland as an AONB • Charnwood Forest as an AONB (although half is now part of the National Forest) • South Pennines as an AONB <p>The Forest of Dean case is well established, having been on the original Hobhouse list for AONB status and is actively supported by CPRE Gloucestershire. [i] Similarly, there is a long-standing case for the Herefordshire Black Mountains to become an AONB as the area was originally intended to be part of the Brecon Beacons National Park but was omitted for administrative convenience. This case is actively supported by CPRE Herefordshire. [ii]</p> <p>Additionally, the case for Dorset and East Devon AONBs to become a National Park has been developed in recent years and has a comprehensive evidence base, with a dedicated website [iii]. CPRE Dorset are among many supporters. The Dorset Coast and Heaths were proposed in the Dower report (1945) as a Division B: Reserves for possible future National Parks.</p> <p>CPRE recognise that Natural England will ultimately assess whether areas proposed for new designation meet the criteria as either amended boundaries, new AONBs or National Parks. We are also aware of Natural England’s existing shortlist of designation cases, which should be the starting point to assess cases for future National Parks or AONBs. They must have sufficient resources, both financial and in staff expertise, to be able to do this effectively (see our detailed response to Q19).</p> <p>Urban landscapes</p> <p>CPRE welcomes the interest of the Panel in whether there should be a new designation for urban landscapes or those near built-up areas. We agree that there needs to be a more strategic approach to urban landscapes and suggest lessons could be learned from</p>
-------------------------------------	---

existing models, for example:

Green Belt

We would like to see a more strategic approach to improving the quality and benefits of Green Belt land through new funding streams and integrated land management structures/joint committees to coordinate. We would recommend that the Review encourages further take-up of the successful model of the Lee Valley Regional Park Authority in and around London, which has sustained a long-term programme of environmental improvement and increased public access to Green Belt land within its area.

There are also campaigns for new Green Belt which CPRE supports and which the Review could usefully endorse, such as for South Hampshire [iv], and Norwich [v].

Cities

There are a variety of approaches which take a holistic approach to urban landscapes. These include the Bristol Green Capital Partnership which brings together organisations working to improve the sustainability of the city and quality of life for its residents. One of their themes is 'nature' and to work towards a city 'where nature is thriving, wildlife abounds and everyone has access to inspiring green spaces close to where they live'. [vi]

Another example of this kind of strategic approach is reflected in the Brighton Biosphere Reserve, which was designated in 2014 by UNESCO. [vii]

The Greater London Authority also remains committed to the All London Green Grid policy framework, which aims to increase access to open space, conserve landscapes and the natural environment and increase access to nature, along with several others. [viii]

These are positive and strategic approaches to protecting and enhancing urban landscapes and those near built-up areas, for the benefit of communities and visitors as well as the wider environment, so should be considered if the Panel pursue a new type of designation close to towns and cities.

Recommendations:

- Natural England should produce a realistic shortlist of future designation work, prioritised against transparent criteria, which have themselves been subject to public consultation and with a properly resourced programme to address the list put in place. We suggest that a 21st century programme of designations should focus on improving access in areas that are not currently well served

	<p>by the existing network of National Parks and AONBs.</p> <ul style="list-style-type: none"> Any new urban designation should take a strategic approach and ensure that it will benefit residents, visitors and the wider environment. <hr/> <p>[i] CPRE Gloucestershire, AONB Status for the Forest of Dean: http://www.cpreglos.org.uk/campaigns/forest-and-woodlands/aonb-status-for-the-forest-of-dean</p> <p>[ii] CPRE Herefordshire, A New AONB in the Marches? https://www.cpreherefordshire.org.uk/assets/ef951e77e4/CPRE_AONB_REPORT_2012.pdf</p> <p>[iii] Dorset National Park website: https://www.dorsetnationalpark.com/</p> <p>[iv] CPRE Hampshire are leading the campaign for a new Green Belt in the county: http://www.cprehampshire.org.uk/campaigns/green-belt-for-southhampshire</p> <p>[v] CPRE Norfolk are campaigning for a Norwich Green Belt: http://www.cprenorfolk.org.uk/planning/policy-statements/green-belt-for-norwich/</p> <p>[vi] Bristol Green Capital: http://bristolgreencapital.org/</p> <p>[vii] Brighton and Lewes Downs UNESCO World Biosphere Region: https://www.thelivingcoast.org.uk/</p> <p>[viii] All London Green Grid: https://www.london.gov.uk/what-we-do/environment/parks-green-spaces-and-biodiversity/all-london-green-grid</p>
21. Are there lessons that might be learnt from the way designated landscapes work in other parts of the United Kingdom, or abroad?	We do not feel qualified to answer this question.
Part 4	
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?	<p>CPRE does not believe that the term AONB clearly communicates their national importance in the same way that National Park does, nevertheless it is a term which is now well-established and widely used. So, while we do not think that the term should be dropped altogether, we believe that a solution could be a rebranding of them collectively such as the National Landscapes of England. For example, North Wessex Downs AONB - a National Landscape of England.</p> <p>See our answer to 13 regarding the statutory purposes of National Parks and AONBs.</p>
23. The review has been asked to consider how designated landscapes work with other designations such as National Trails, Sites of	The network of designated areas across the country is vital to promote, enhance, and protect our countryside. Landscape designations are different from, but often complementary to other designations, and it must be acknowledged that there is great scope for the common management of overlapping designations. CPRE believes that landscape designation is important but by itself is an incomplete descriptor of the countryside without clear linkage

<p>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?</p>	<p>to the wider system. Landscape cannot be cordoned off or isolated; it is everywhere, each area with distinctive character and sense of place. Additionally, landscapes provide invaluable connectivity, complexity, and adaptability to the living world - crucial within a rapidly changing climate. This goes beyond National Park and AONB designations - each and every designation is important. While National Parks and AONBs provide invaluable refuges for wildlife and breathtaking landscapes for people, strong relationships across designations are necessary to ensure healthy habitats and continuous landscapes. CPRE's approach is based on the principles of landscape-scale conservation which considers the landscape and environment as a complete whole - as a dynamic, complex and linked system.</p> <p>We are aware that delivery across designation types can occasionally be conflicted as some agencies have to answer to government or local authority departments or have local affiliations, which can mean cross designation working can be harmonious for the wider landscape or siloed with a local focus.</p> <p>Therefore, CPRE believes priorities for our multi-faceted network of designations are:</p> <ul style="list-style-type: none"> • Landscape-scale connectivity: designations should be complementary and maximise access to high quality space for people and wildlife. • Bigger, better, more joined up designations: building on the recommendations of the Lawton review (2010) to ensure a high standard of management and true habitat connectivity and genuine buffer zones. • Integrated management to ensure decisions made at designation-level are complementary with those at habitat and landscape-level. • Maintaining specific protection for the sites where rare species flourish or where there are archaeological remains, whether within or outside of National Parks or AONBs. • Allowing for land under a National Park or AONB designation to simultaneously function as designated Green Belt with the purpose of preventing urban sprawl and settlement coalescence. • Facilitating communication and 'landscape scale working agreements' between National Parks/AONBs and the bodies responsible for other designations.
<p>24. Do you have any other points you would like to make that are not covered above?</p>	<p>Climate Change Mitigation and Adaptation</p> <p>Our National Parks and AONBs have a vital role to play in mitigating the causes of climate change and providing adaptive capacity to lower the risk posed by the consequences of climate change. The large woodland assets and peat reserves found in many protected areas serve as carbon sinks, actively sequestering</p>

and storing CO₂ if managed in optimal condition. For example, 31% of blanket bog and 13% of lowland raised bog is within these areas. Furthermore, many protected landscapes are very important catchment areas and provide a vital role in storing water especially in the peat of the uplands and the chalk aquifers of chalk and limestone areas - essential both for storage of fresh water resources and the mitigation of flooding further downstream - making the 690 miles of chalk rivers that flow through protected landscapes all the more important. The Committee on Climate Change's recent land-use report found that the impacts of climate change are already degrading the services provided by the natural environment.

In the future, these features and the capacity of protected landscapes to combat the effects of our changing climate will become increasingly valuable. The role of National Parks and AONBs in climate change mitigation and adaptation therefore should be given significant focus in this Review. See also the answer to Q9.

Major Development

CPRE believes it is very important that Government is held to account for policy decisions taken at the national level, which then impact on National Parks and AONBs. We encourage the Review to recommend that the National Infrastructure Commission (NIC) must not promote major infrastructure or other development in these nationally important landscapes. We are also very concerned that the NIC has to date not shown a proper understanding of the potential direct and indirect effects of growth policies it has recommended, in particular the Cambridge – Milton Keynes - Oxford Arc growth proposals which have the potential to increase development and visitor pressure in the Chilterns AONB.

We are concerned that there is a general lack of regard for the purposes of these landscapes across Government and agencies, illustrated by the recent deregulatory agenda. Policy initiatives such as extending permitted development rights for rural conversions have included National Parks and AONBs in the initial scope but have then exempted them after concerns were raised by NGOs. This is symptomatic of a Government mindset which states that National Parks and AONBs have the highest level of planning protection but then undermines this in the development of siloed Government policy.

In July 2018, the Business, Energy and Industrial Strategy (BEIS) select committee was considering a proposed new planning policy for new nuclear disposal infrastructure and their report concluded that designated landscapes should not be ruled out as possible locations to bury nuclear waste. This exemplifies the impact

national decisions can have on the future integrity of National Parks and AONBs - and the importance of cross government support for the future of these landscapes. CPRE signed a joint letter raising concerns about the view of Ministers.[i]

There are occasions when NPA decisions on major development may be unpopular. We contend that the NPPF major development test (para 172) should be tightened so that there are more rigorous backstops, such as automatic call-ins for controversial major development approved by NPAs, particularly when this is against their own Planning Officers' advice or when statutory consultees have raised significant concerns.

Minerals

One of the most significant forms of major development in National Parks is mineral extraction and para 172 of the revised NPPF states the presumption against such forms of development, subject to the 'major development test'. Central to this test is the assumption that need would normally be met from outside the designated area. For minerals, this is reinforced in para 205 (a) where (as far as is practical) landbanks of non-energy minerals should be maintained from outside National Parks and AONBs. In some National Parks, for example the Peak District, effect is quite properly given to the Framework by local plan policies (of both the PDNPA and Derbyshire County Council) which provide for a shift in future supply to adjacent permitted reserves (outside the National Park) so as to allow a progressive reduction of mineral extraction impacts on the designated landscape.

We are wishing to draw this to the attention of the Panel as mineral extraction is an enduring potential conflict with National Park purposes but one where the current strict protection can be maintained into the long term future without wider socio-economic detriment. This is the conclusion of a recent economic study (commissioned as supporting evidence for the Growth Strategy of the adjacent High Peak Borough Council) looking at the mineral industry to 2040, which concluded that:

Over the coming years, some internal shifts in the local labour market is expected to arise from current Peak District National Park planning policy. It is considered likely that current policies will result in some displacement of extraction activities from the National Park to areas in the remaining parts of Derbyshire. This is not anticipated to have a significant impact on overall local workforce numbers over the coming years.[ii]

In addition, the study suggests strongly that infrastructure needs in the local LEPs (D2N2 and the Sheffield City Region) can still be met readily because of 'ample reserves':

The leading driver for future demand for aggregate resources from the two districts will be the delivery of major capital projects across the northern and eastern regions. Given the pipeline of known projects being promoted by the LEPs there will be significantly higher levels of demand for aggregate resources over the coming decade, and beyond. Given the ample reserves of minerals in the High Peak and Derbyshire Dales areas, it is considered that there is potential for increasing the supply of minerals should the levels of demand also increase.

We draw the conclusion from this evidence that strict protection, through the rigorous operation of the major development test and other NPPF policies, lies at the heart of balancing long term sustainable development in National Parks and AONBs, without compromising socio-economic aspirations.

[i] <https://www.cpre.org.uk/media-centre/latest-news-releases/item/4966-environmental-charities-call-government-undermine-national-parks-careless-words>

[ii] See https://www.highpeak.gov.uk/media/2674/Minerals--Aggregate-Extraction-in-High-Peak--Derbyshire-Dales---Draft-Report/pdf/Minerals_Aggregate_Extraction_in_High_Peak_Derbyshire_Dales_-_Draft_Report.pdf