

Landscapes review: ADEPT submission (final)

Submitted to Landscapes Review: Call for Evidence Submitted on 2018-12-18 10:19:33

The terms of reference for the review are [here](#).

About you

1. Are you replying as a member of the public or on behalf of an organisation?

Organisation

2. If you are replying as a member of the public

What is your name?: N/a

If you enter your email address then you will automatically receive an acknowledgement email when

3. If you are replying on behalf of an organisation or organisations

Which organisation(s)?: Association of Directors of Environment, Economy, Planning & Transport (ADEPT)

What is your name and position?: David Dale, Policy Officer

If you enter your email address then you will automatically receive an acknowledgement email when you submit your response. We may also use this to contact you further.: daviddale2401@gmail.com

4. We would like to be able to use extracts from submissions in our final report. If you would not like them, potentially, to be made public, please tell us here.

Yes, I am content for you to use extracts of my response in the final report

5. We have obligations under freedom of information laws and there is more information below. For the purposes of these laws, would you like your response to be confidential?

No

If you have answered yes, please give your reason:

Before anything else

6. We would love to know what makes National Parks and AONBs special to you

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Not Answered

Part 1 - Opening thoughts

We would like any opening thoughts on the role played by National Parks and AONBs - you may want to make a more detailed suggestion further on.

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.

We fully support the Government's ambition and commitment set out in the 25 Year Environment Plan to have a comprehensive and long-term approach to protecting and enhancing our varied natural environments and habitats.

The legislation governing protected landscapes in England has been successful, delivering an important and much-valued national achievement. The need to preserve the beauty and biodiversity – together with the crucial economic and social value – of our natural environment is even more

important now that it was 70 years ago. The scale and complexity of the challenges we face has increased and will continue to do so. For example, the target of building 300,000 new homes each year to help tackle the housing crisis brings development pressure across the country but particularly in those places with the most acute housing shortages. This makes it all the more important not just that green infrastructure is provided in and near new developments, but also that people can access protected landscapes for recreation and health.

The prosperity and sustainability of the largely rural communities living and working in the protected landscapes is critical to ensuring the long-term protection and enhancement of those same landscapes, which have been created and formed by centuries of land management. Socio-economic sustainability should be reflected in the statutory purposes of National Parks and AONBs in the same way as environmental protection and understanding and enjoyment are. It is essential that rural communities are provided with the necessary infrastructure, including affordable housing for local people, full digital connectivity and transport, to support skills, jobs and growth.

Linked to this, it is important that authorities and boards charged with managing the protected landscapes work effectively with local councils and new forms of public and private sector organisations such as Local Enterprise Partnerships (LEPs) and Sub-national Transport Bodies (STBs). Those protected landscape authorities and boards must have a voice in the development of Local Industrial Strategies (led by the LEPs) if the protected areas are to play their part in delivering sustainable local growth. They must also be represented on STBs as regional transport investment strategies are developed, to ensure that transport infrastructure meets the needs of rural communities and of visitors to the protected landscapes.

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.

Affordable housing within the areas of protected landscape is vital for the prosperity and sustainability of the largely rural communities that live and work there. As planning authorities in their own right, National Parks must balance the supply and affordability of housing for the resident population. This must include managing the number of second homes and holiday accommodation. We would also urge National Parks to work closely with their neighbouring local councils, as the consequences of necessary planning constraints on building within protected landscapes puts additional development pressures on the rest of a local council's area.

To be effective in meeting their purpose, National Park authorities and AONB management boards must work in partnership with the local councils whose areas they operate in and are adjacent to (we anticipate that individual councils responding to this call for evidence will provide successful examples) This is particularly the case with the place-based services covered by ADEPT's members, including planning, transport, economic development, public rights of way, countryside and heritage services. Severe resource pressures over the last 10 years as council budgets have been reduced, and a greater proportion of the remaining budget allocated to social care services for vulnerable children and adults, has seen the funding of these environment services reduced in many cases to a statutory minimum. This has had a serious negative impact on councils' capacity to help deliver the aims of protected landscapes.

For example, the Cotswolds AONB Conservation Board states that "the seven highway authorities that coincide with the AONB have invested a considerable amount of time and money in upgrading, managing and maintaining the public rights of way (PROW) network with a lot of support from volunteers such as the Ramblers Association and parish councils, but particularly from the Board's Cotswold Voluntary Wardens. The Board is concerned that due to a combination of reducing highway authority resources and increasing demand, there is a deterioration in the condition of the PROW network having a direct impact on the ability of residents and visitors to access the Cotswold countryside and on the economy, particularly tourism businesses, local shops and pubs and on the

social and health and wellbeing of the area. This deterioration and subsequent impact is expected to worsen for the foreseeable future as funding and staffing levels are likely to continue to decrease.”

The structure of local government is also an issue that creates challenges for National Park authorities and AONB management boards. In traditional two-tier areas, progress towards a unitary system is largely being driven from the bottom up by proposals from county and district councils but the process is inevitably slow and complex. Local Enterprise Partnerships are now the drivers of economic growth and the lead for developing Local Industrial Strategies across the country. Devolution has produced a patchwork of Mayoral and non-Mayoral Combined Authorities, alongside a tier of Sub-national Transport Bodies. Many areas have Local Nature Partnerships (LNPs), which operate with varying degrees of effectiveness and engagement. The complex and changing nature of the local governance environment is a challenge for the protected landscapes. It is important that National Parks and AONBs engage with LEPs and STBs – directly and through LNPs – to help shape the economic and transport strategies that will shape their wider areas and have an impact on the protection of landscapes, the prosperity and sustainability of the communities within them, and wider public access to them.

Part 2 - Views

We'd like to hear views on particular issues.

9. What views do you have about the role National Parks and AONBs play in nature conservation and biodiversity? a) Could they do more to enhance our wildlife and support the recovery of our natural habitats?

While they play an important role in supporting nature conservation and biodiversity their ability to influence and deliver has declined due to reductions in funding and staffing. It is important, particularly as the UK prepares to leave the EU, that National Parks and AONBs collaborate and partner with local councils, LNPs, voluntary groups and others to make the most effective use of total resources and take a strategic approach to supporting conservation and biodiversity in and around the protected landscapes.

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

Our comments above (question 9) are also relevant here.

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?

This is a crucial aspect as most of the land within protected landscapes is in private ownership, and working with farmers and landowners is central to the activity of National Parks and AONBs. It is important that the reformed system of agricultural payments when we have left the EU gives sufficient weight to protecting and enhancing the environmental assets in protected areas. Alongside healthy wildlife populations and protected habitats, this includes delivering public goods such as good soil and water quality, flood risk management by investing in upland catchment areas, and sustaining and providing public access. National Parks and AONBs should have a role in determining the purpose and allocation of land management payments in their area in order to align with their strategic priorities and management plans. Many AONBs and National Parks are in the upper parts of catchments and land management in these areas can have a significant impact on flooding downstream. This should be recognised through farm payments.

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

Access and recreation are important aspects of improving physical and mental health (see question 17 below). We were pleased to see the chapter on Connecting people with the environment to

improve health and wellbeing in the Government's 25 Year Environment Plan, including the recognition of the importance of green and blue infrastructure in towns and cities.

13. What views do you have about the way National Park and AONB authorities affect people who live and work in their areas? a) Are they properly supporting them and what could be done differently?

This goes beyond the protection of landscapes but is linked to it. This is about having prosperous and sustainable communities within protected landscapes (see our comments under question 7 above), and making this an explicit mandatory purpose of National Parks and AONBs. For ADEPT, the key issues are around:

- Homes – the right types and numbers of affordable houses for local people
- Jobs – sufficient, skilled employment to keep young people in the area or attract them back, and
- Infrastructure – including full digital connectivity.

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

We do not see any need to change existing statutory roles and responsibilities in relation to planning, housing, highways and transport. Consideration should be given to making AONBs statutory consultees on local plans, planning applications, and infrastructure projects.

Part 3 - Current ways of working

We'd like to ask some specific questions about the way National Parks and AONBs work at the moment.

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?

ADEPT does not have a view on this in the round, although our individual member authorities are well-placed to comment on local experience of National Park and AONB governance in their areas. As noted above (questions 7 and 8), we are keen that National Parks and AONBs should have good links with local councils, LEPs, STBs, and LNPs in order to engage with the development and delivery of wider spatial strategies that will affect them.

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?

Not applicable.

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?

The role of the protected landscapes in access and recreation are important aspects of improving physical and mental health. As noted above (question 12), we were pleased to see the chapter on Connecting people with the environment to improve health and wellbeing in the Government's 25 Year Environment Plan, including the recognition of the importance of green and blue infrastructure in towns and cities. ADEPT is already engaging with DEFRA to help inform and shape its Mental Health Programme. We are also working with the Association of Directors of Public Health (ADPH) to identify common issues around the social and environmental determinants of health, including a collaborative project 'Creating Healthy and Resilient Communities' project to explore how health and wellbeing can be designed-into existing, and new, communities through good development, access and place-shaping.

We are in favour of strengthening the role of Public Health in the governance of National Parks and AONBs.

We noted above (question 8) that severe reductions in budgets for place-based services has reduced been a £700m real terms reduction in funding for councils' public health budgets between 2014/15 and 2019/20. Investment in public health is needed in recognition of the role of local councils as key partners in unlocking the potential of National Parks and AONB in improving health and wellbeing. ADEPT and ADPH support widening access to National Parks and AONBs for disadvantaged communities as part of broader efforts to reduce health inequalities.

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

Not applicable.

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

Not applicable.

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

We would not expect to see any specific proposals for creating new National Parks or AONBs, or for altering the boundaries of existing ones, come out of the current review. Any such proposals should come from the places concerned, and should be subject to having the full support of the local councils concerned.

ADEPT would advocate the creation of National Marine Parks. We support the initiative by one of our members – Plymouth City Council – to develop partnership proposals for a National Marine Park in Plymouth Sound and the surrounding area with its unique mix of naval, fishing, scientific and leisure uses. At a time when the public has become much more aware of the damage to the marine environment in general, a National Marine Park would be a powerful statement, in a way that the public already supports, that Britain cares for its marine environment as much as it does its terrestrial countryside.

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

Not applicable.

Part 4 - Closing thoughts

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

National Park is the right term – clear and simple, and capturing their national significance and importance. The acronym 'AONB' may not mean much to the public. Possible alternatives might include 'Protected landscape' or 'Protected Area/Place', although as any change would require an active communications campaign this would probably only be worthwhile in the context of a broader publicity campaign in the event of any other changes to National Parks and AONBs.

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

It is right that there is a way of designating smaller sites (inside and outside the protected landscapes) for specific wildlife or public access purposes. As a general rule, it is desirable in terms of public understanding and support for there to be a small number of types of designations and for their status to be clear.

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

Not applicable.