



BY EMAIL

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Dear Sir/Madam,

Guidance for assessing landscapes for designation as National Park or Area of Outstanding Natural Beauty in England.

Thank you for the opportunity to comment on the draft Guidance for assessing landscapes for designation as National Park or AONB. Below are the comments from the Cotswolds Conservation Board

General comments

The draft guidance uses the term 'wildness' or 'relative wildness' as a factor in evaluating both natural beauty and recreation. Wildness is not a term that can be applied to the English landscape which is a product of long term human intervention. Whilst this is picked up within paragraphs 3.5 and 3.7, a separate paragraph making this point clear would be most useful.

Instead of the term 'relative wildness' we recommend the term 'relative remoteness' as this is more appropriate to the English landscape and would enable an area to be considered relative to its surrounding area. See comment below regarding Appendix 1

The draft guidance considers the assessing of landscapes for designation. There needs to be included guidance for assessing landscapes for de-designating.

Comments of specific points.

3.10 – the paragraph states that 'National Park designation brings with it more significant changes in the management of the land.' This is not the case. Also, any area that requires significant changes in land management would probably fail to meet the designation criteria.

4.15, Table 2 – an area that fulfils both natural beauty and open-air recreation by definition should be a National Park.

4.22 – the last sentence states that 'Not all factors will be relevant in every case, as some will be absent in many cases.' This is a really important point and needs to be made more prominent in the guidance. Added to this should be the important point that area should be considered in the context of its locality.

4.24, first bullet point – the bullet point says that the natural beauty required of a National Park and an AONB is 'in practice' the same. The natural beauty required of a National Park and of an AONB is the same. This was confirmed by the Government in June 2000. See footnote 2 on page 4.

4.24, fourth bullet point – what is 'ordinary countryside'? A definition would be useful. The paragraph also states that comparisons are not to be made to other designated areas, Whilst the reference point in the guidance is the surrounding countryside, the quality represented by designated AONBs and National Parks is a factor that should be taken account of in helping to come to a conclusion as to whether an area should be designated.

5. Consideration of Desirability of Designation – threat to the area. The threat to an area might be a factor in influencing the relative priority for the assessment of the natural beauty of an area and its determination as being an AONB or National Park. However threat should not be a consideration in the subsequent decision as to whether an area should be designated.

5.4, Rarity or Representativeness – representativeness should not be used when making a judgment on a landscape as it may prevent an area being designated that otherwise fulfils all the other criteria if other landscapes of similar character are already designated. Rarity, however, should add weight to the consideration.

5.8 and 5.9 – Mechanisms, powers and duties follow on from designation and should not form part of the consideration. Governance should not be a criterion for assessing landscapes for designation. Similarly the lack of financial resource availability should not determine whether a landscape is of AONB or National Park quality.

Appendix 1, Evaluation Framework for Natural Beauty Criterion – ‘Wildness’ is a difficult term in the English countryside. The entire landscape of England is the product of thousands of years of active human intervention. Relative ‘Remoteness’ would be a better title to use as the Factor and indicator NB15 should be deleted.

Appendix 2 Evaluation Framework for Recreation Criterion – again, change relative wildness to relative remoteness in sub-factor R2. Indicator R2, change tranquillity to relative tranquillity and wildness to relative remoteness.

If the recreation criterion were applied to existing AONBs, it may be that some would qualify for National Park status.

Appendix 3: National Park and AONB Mechanisms, Powers and Duties – The Sandford Principle, whilst statutorily only applying to National Parks, has also been applied to AONBs since the publication of the policy statement on AONBs by the Countryside Commission in 1991 (CCP356).

Conservation Boards also have a duty to foster the economic and social well-being

If you would like to discuss or clarify any of the above comments, please do not hesitate to contact me.

Yours faithfully

A handwritten signature in black ink, appearing to read 'Martin Lane', written over a horizontal line.

Martin Lane,

Director