

A Cotswolds National Park Position Statement

Discussions over whether the Cotswolds should be considered for designation as a National Park have steadily grown over the last two years. These discussions chime with the Government's 25 Year Environment Plan, launched in January 2018 and the Glover Review of National Parks and AONBs, which commenced in June 2018 and is due to report in 2019.

In this Position Statement the Board outlines the broad case for the Cotswolds to be considered for designation as England's next National Park.

Introduction

The Cotswolds is an ancient naturally bounded settlement area identified by man as far back as the Anglo Saxon period. The area represents the best known section of oolitic limestone stretching from the Channel coast to the North Sea. It is often described as the quintessential English rural landscape and reflects the human influences that have moulded it through time.

The underlying limestone, field boundary walls, stone buildings and rolling hills are all seamlessly interwoven. Settlements, both large and small, built from limestone with a common architectural heritage sit within the countryside around them. No other area combines such a high quality landscape with its high quality village and town architecture, the sum of the whole is very much greater than the sum of the individual parts.

The industrial revolution passed the Cotswolds by and until the second half of the 20th century it was largely untouched. Even today much of the landscape is sparsely populated and is remote in feel. It is a unique and stunningly beautiful area.

Operating context

The Cotswolds was originally designated an Area of Outstanding Natural Beauty (AONB) in 1966 and extended in area in 1990. At 790 sq miles or 2,038 sq kms it is the largest of AONBs and third largest Protected Landscape in England, after the Lakes and Dales National Parks.

The statutory purpose of AONB designation is to conserve and enhance the natural beauty¹. It is Natural England's view that the practical application of the natural beauty criteria is identical for National Park and AONB designations, despite there being differences in the degree to which the criterion is clarified in the legislation². It is also the Government's formal position that the natural beauty required of an AONB and a National Park are the same³.

The AONB was designated because of the features of natural beauty which are derived from the geomorphology, the historic land use and the heritage which are evident over the whole area, from the escarpment in the west and through the dipslopes and valleys of the east, and from Bath in the south to Chipping Campden in the north.

The AONB was originally managed via a local authority led Joint Advisory Committee, then a local authority hosted AONB Partnership and from 2004/05 by an independent Conservation Board. The large geographic size of the AONB and its regional and local government complexity led the establishment of the Board.

¹ Section 82, Countryside and Rights of Way Act 2000.

² Guidance for assessing landscapes for designation as National Park or Area of Outstanding Natural Beauty in England, Natural England, March 2011.

³ See Lords Hansard 20 Mar 2006 (Col 51) and Commons Hansard 13 June 2000 (Col 556W).

The Cotswolds Conservation Board is modelled on a National Park Authority and has the following two purposes:

- to conserve and enhance the natural beauty of the AONB and;
- to increase the understanding and enjoyment of the special qualities of the AONB.

and it has a duty to foster the socio economic well-being of local communities.

The Board's membership comprises Secretary of State, Local Authority and Parish appointees, a Board of 37 members modelled on a National Park Authority.

The real challenges of coherently managing such an extensive high quality landscape across 15 local authorities, 5 counties and 3 regions are increasingly clear, and these challenges risk undermining the vision in its original designation as an AONB.

National Park status could provide a more coordinated and consistent approach to the management of the area, putting conserving and enhancing natural beauty and the understanding and enjoyment of the areas special qualities at the heart of landscape management, plan-making and decision-taking.

In June 2018 Defra announced the review of National Parks and Areas of Outstanding Natural Beauty (AONBs). The Review is being chaired by Julian Glover, who is working with a small advisory panel and is due to report in Autumn 2019.

The Review is exploring what might be done better, what changes could assist protected landscapes, and whether definitions and systems - which in many cases date back to their original creation - are still sufficient. Its objectives include examining and making recommendations on the case for the extension or creation of new designated areas.

The Conservation Board recently adopted the Cotswolds AONB Management Plan 2018 - 2023. Within the plan it has an ambition to promote the case for the Cotswolds being designated as England's next National Park.

Headline arguments for considering the Cotswolds for National Park designation

- The landscape: AONBs & National Parks have the same landscape status;
- Designation criteria: the area meets National Park designation criteria;
- The governance model: the Conservation Board is modelled on a Park Authority;
- Parks have evolved from AONBs: South Downs National Park, established in 2010 evolved from the Sussex Downs and East Hampshire AONBs;
- Public understanding and engagement: the public more readily understand and appreciate the title National Park;
- A Park for the South Midlands & West of England: the nearest National Park for Birmingham and Bristol, with significant and diverse urban populations on the doorstep – a geographical gap in the national provision of Parks;
- Consistent planning policy formulation and development management based on the needs of the Cotswolds and implemented for the area as a whole;
- Management of the landscape as a whole, resulting in improved enhancement of the landscape and a reduction in the erosion of landscape quality;
- Consistent sustainable tourism, recreation, countryside access and quite enjoyment policy development and implementation across the whole area.

The basic criteria for a National Park

- An extensive tract of country in England which it appears to Natural England, by reason of its: natural beauty and the opportunities it affords for open-air recreation, having regard to both its character and its position in relation to centres of population, it is especially desirable that it is designated for National Park purposes.

The Cotswolds AONB meets the designation criteria for a National Park

- The Cotswolds landscape is already acknowledged to meet the natural beauty purpose of a National Park; it is already designated an AONB, with National Parks and AONBs having the same landscape status.
- The Cotswolds already meets the open air recreational purpose of a National Park, having significant existing activity and visitor numbers, which is recognised by Defra and Natural England in the Conservation Board's second purpose being modelled on that of a Park.

The Cotswolds compared to exiting National Parks

- Same landscape value
- Landscape similarities to the South Downs
- Third largest protected landscape
- Largest resident population
- Closer than most Parks to significant urban populations
- Third largest number of day visitor numbers
- Easier to access than most Parks
- Better known than most Parks
- Joint largest number of local authorities
- Smallest Defra financial settlement
- Administratively more complex than most Parks

Pressures on the Cotswolds AONB

- Planning pressures: CPREs review of housing in England's AONBs in 2017 identifies the Cotswolds as one of the most pressurised protected landscapes;
- Infrastructure: Highways England's A417 Missing Link and Network Rail's Great Western line electrification;
- Population and visitors: 150,000 residents and 23 million day visits a year;
- Fragmentation: 15 local authority areas - 8 district councils, 4 county councils, 3 unitary councils; parts of 283 parishes and; straddling 3 regions – the South West, South East and Midlands.

What could a Cotswolds National Park achieve?

- A single Local Plan leading consistent planning policy formulation based on the needs of the Cotswolds and implemented for the area as a whole;
- A more effective and influential landscape led Management Plan for the Park, linked to the single Local Plan;
- Management of the landscape as a whole, resulting in improved enhancement of the landscape and a reduction in the erosion of landscape quality;
- Application of Natural Capital and Cultural Capital to resource management across a whole landscape;

- Design and consistent local delivery of a single integrated rural development and agri-environment scheme;
- Ensure quality design and use of materials appropriate to the area;
- Join up of multiple advisory services and funding streams;
- Enable and lead effective networks for collaboration, co-ordination and delivery with landowners, farmers, businesses and communities across the Park as a whole;
- Experiment and trial new, innovative and entrepreneurial initiatives;
- Enhanced and consistent sustainable tourism, recreation and quiet enjoyment policy development and implementation across the area;
- Co-ordination and delivery of sustainable tourism and visitor management for the whole area;
- Improved and consistent approach to the management of the rights of way network, including design and use of materials appropriate to the Cotswolds;
- Stronger local, national and international brand for the area and the businesses that operate within the area and depend on the brand;
- Clearer identity for the area and the communities living within it, inspiring even greater pride and value in the quality of the landscape and environment;
- More appropriate resourcing and financing settlement for the size and scale of the protected landscape;
- Improved ability of urban communities in the West Midlands, Avon and outer London to access, explore and enjoy their nearest National Park, delivering in parallel significant health and well-being benefits to those diverse populations.

The disadvantages of a National Park

The evidence base for comparing circumstances before with after National Park status is not clear cut. Evidence has very often not been collected or independently assessed at a national level. The potential disadvantages of National Park status are perceived to include:

- A more challenging or restrictive planning system within a National Park.
- Additional red tape or bureaucracy associated with a National Park Authority.
- An increase in house prices as a result of National Park designation.
- More visitors to a Cotswolds National Park compared to the Cotswolds AONB.
- The operation of a National Park having a higher cost to the Treasury.

A Cotswolds National Park Authority's purposes

National Park Authorities have the following two purposes and socio economic duty:

- Conserve and enhance the natural beauty, wildlife and cultural heritage of the National Park;
- Promote opportunities for understanding and enjoyment of the National Park's special qualities.
- A duty to foster the social and economic well-being of local communities within the National Park.

A Cotswolds National Park Authority could readily adopt the same purposes and duty, particularly when the Cotswolds Conservation Board is already modelled on a National Park Authority.

However, a new National Park could serve as an opportunity to develop an updated set of purposes, which might focus on the following:

- Conserve and enhance the natural beauty, natural capital and cultural capital of the area;
- Promote the understanding, exploration and enjoyment of the area and what makes it special;
- Support and promote sustainable farming, tourism, forestry and other economic development of the area;
- Support and promote the social well-being of the local communities of the area.

A Cotswolds National Park Authority's membership

The Park Authority could adopt the same structures of the existing Conservation Board and National Park Authorities ie 40% Secretary of State, 40% Local Authority and 20% Parish appointees.

However, the opportunity could be taken to explore alternative arrangements e.g. an equal number of Secretary of State, Local Authority and appointees resulting from direct elections onto the authority.

How would the Park achieve its purposes?

- To be a single environmental delivery body or commissioner acting on behalf of all government departments, delivering and/or investing in a local Cotswold menu of public goods and services;
- To lead the development of a strategic local plan and management plan for the whole area with associated policies to guide development and infrastructure;
- To lead the provision and co-ordination of information and interpretation about the AONB and directly lead or stimulate the provision of informal recreation and access services;
- To lead sustainable rural economic development, the development of a single rural economic plan and its implementation through an associated programme of advice, action and investment;
- To provide a single one stop shop for Park wide advisory services covering; visitor information, rural skills, participation and volunteering, trails and local rights of way, development design, landscape, biodiversity and the historic environment.

What would the Park plans look like?

- Strategic landscape based local plan accompanying or incorporating a Park management plan;
- Park wide strategic plan which stimulates the development of neighbourhood plans with which to inform and achieve local delivery;
- 25 year approach, complementing the Government's 25 Year Environment Plan and Defra's 8 Point Plan for England's National Parks;
- Incorporating Defra and its agencies (Forestry Commission, Environment Agency, Natural England) to provide a single strategic landscape scale vision and plan;
- Applying a Natural and Cultural Capital approach, combining landscape and water catchment based approaches;
- Informing and leading the creation of a local menu for the purchase of public goods and services and investment in rural land management and rural development.

Why it is especially desirable to create a Cotswolds National Park

Any candidate National Park would be assessed by Natural England to determine if it is **especially desirable** to create a National Park. The key criteria used and the related evidence from the Cotswolds in response to the criteria are as follows:

- Cotswolds AONB is an extensive tract of land that satisfies the statutory tests of natural beauty and opportunities for open air recreation:
 - the area is already designated an AONB for its natural beauty, it is already defined as being of equal landscape status to a National Park,
 - the AONB receives 23 million day visitors a year, the third largest of any Protected Landscape and more than the majority of Parks,
 - the Conservation Board has the same enjoyment / recreation purpose as a Park Authority.
- The AONB is of such significance that National Park purposes should apply to it:
 - the Conservation Board already has the same two purposes and socio economic duty as that of Park.
- It is experiencing issues that will affect the area's special qualities, understanding and enjoyment, unless designation occurs:
 - the area experiences significant development and infrastructure pressures and planning policies and development management are not consistent across the whole AONB;
 - CPREs review of housing in England's AONBs in 2017 identifies the Cotswolds as one of the most pressurised protected landscapes.
- National Park purposes are best pursued through the management mechanisms, powers and duties that come with National Park designation:
 - the Conservation Board's purposes, duty and governance structure is modelled on a Park Authority; the Board is already expected to deliver Park purposes, but is not resourced adequately to do so.
- There are other relevant factors that tend to suggest desirability to designate. Such factors include:
 - National Park Authorities have a duty to foster the economic and social wellbeing of local communities within the National Park as they pursue National Park Purposes;
 - the Board has the same socio economic duty as Parks.
 - National biodiversity policy;
 - applies equally to the Cotswolds.
 - National sustainable development policy;
 - applies equally to the Cotswolds, although the AONB is fragmented across 11 local plans.
 - Emerging national policy and procedures for agri-environment schemes post Brexit;
 - the same policy and procedures should equally apply to the country's third largest protected landscape.

Planning function delivery options

Current legislation would result in the National Park Authority being the planning authority for the whole National Park, but it would need to agree with Government and the County, Unitary, District and Borough Councils how best to deliver its planning responsibilities.

Traditionally National Park Authorities have delivered planning functions across the whole Park direct. However the majority of National Parks are smaller than the Cotswolds, have a smaller resident population and a far smaller number of planning applications.

The South Downs National Park shares similarities with the Cotswolds and provides an alternative model for consideration, whereby the Authority:

- Produces and adopts the local plan;
- Originally delegated planning services to all local authorities⁴;
- Currently delegates development control to 5 authorities and contracts with those authorities for the delivery of planning services;
- Delivers planning direct in the remaining authority areas, ie some authorities have given back their delegation as it doesn't make sense for them to deliver planning in the Park area since the size of area concerned and/or the number of applications does not warrant or justify separate systems or a delegation;
- Monitors the delegation of the delivery of development control and can decide to call in an application for determination by the Park Authority;
- Informs and substantiates the housing needs of the Park and its communities;
- Works with County and Unitary Councils to agree joint Waste & Minerals Plans;
- Compiles design guidance for when planning applications are being developed and determined.

Housing numbers and affordable housing provision

Government policy requires National Park Authorities to consider the economic and housing needs of the community living in the Park with particular emphasis on affordable housing. The National Planning Policy Guidance under Natural Environment/Landscape refers to the English National Parks and Broads UK Government Vision 2010. Paragraph 78 states: "The Government recognises that the Parks are not suitable locations for unrestricted housing and does not therefore provide general housing targets for them. The expectation is that new housing will be focused on meeting affordable housing requirements, supporting local employment opportunities and key services."

Park boundary

It is suggested that new national legislation could enable a National Park to adopt the existing Cotswolds AONB boundary. A boundary review might then be undertaken after 5 – 7 years of the day to day experience of the Park operating.

The Glover Review will be liaising with Natural England on the process of designating National Parks and AONBs and extending boundary areas, with a view to improving and expediting the process.

Legal status of a Cotswolds National Park Authority

It is envisaged that a Park Authority would be a public sector body, a special local authority as for existing National Parks, a body able to trade and sell services. The Authority could be supported by a National Park Landscape Trust, a membership based charity.

Potential enabling legislation & timescale

Could be established via an Act linked to Brexit legislation. There is potential for a new Park Authority to be established in the mid 2020s,

11 December 2018

⁴ Section 101, Local Government Act 1972. Specified by Hilary Benn MP, SoS at Defra at the time of the establishment of the South Downs National Park Authority

A Potential Cotswolds National Park

Frequently Asked Questions, FAQs

1. A National Park discussion and debate

Q: What has prompted the debate about the merits of a Cotswolds National Park?

A: The discussion as to whether the Cotswolds should be designated a National Park has steadily grown over the last two years. Comparison with the South Downs National Park landscape has led to questions as to why the Cotswolds aren't similarly designated a National Park. An on line Parliamentary petition called for the new designation. Local MPs advocated that the case for a National Park be explored and debated, having identified that a Park Authority would be more effective at safeguarding the quality of the landscape and environment, achieve a more consistent planning policy approach and benefit the tourism sector. National organisations such as the Natural Capital Committee have advocated new National Park designations and the Landscape Institute's President questioned why such a significant, special and well known landscape is not a National Park. An increasing number of local communities have called for the National Park designation for the Cotswolds to be given serious consideration.

In parallel with these local discussions the Government has launched a national review of National Parks and Areas of Outstanding Natural Beauty (AONB). The Glover Review is exploring a range of issues, not least whether there should be new National Parks. It is taking evidence until mid December 2018 and is due to report in Autumn 2019.

2. Why consider a National Park

Q: What are the main benefits of a National Park?

A:

- The National Park purposes explicitly refer to conserving and enhancing the natural beauty, wildlife and cultural heritage of the National Park, clearly recognising the value and importance of wildlife and heritage,
- The Park purposes include the promotion of the opportunities for understanding and enjoyment of the National Park's special qualities, highlighting the importance of the Park landscapes for recreation and exploration,
- Planning policy focused on the needs of the National Park area and the purpose of designation,
- Reduced number of overall planning policies compared to multiple local authorities operating across the same landscape,
- Better integrated and more consistent decision making across the designated landscape as a whole,
- Strength, identity and public recognition of the National Park brand,
- Greater collaboration across the Park area between organisations to secure new projects and associated resources for the area,
- Clear purposes underpinning Park designation resulting in a clear focus on the management of the Park landscape, environment, access and its special qualities for the long term, reflected in the Park's statutory local plan and management plan.

3. National Parks compared to an Area of Outstanding Natural Beauty (AONB)

Q: So what is the difference between a National Park and an AONB?

A: Both National Parks and AONBs are designated under the same legislation, the National Parks and Access to the Countryside Act 1949 and share the same landscape protection status. National Parks are designated:

- To conserve and enhance the natural beauty, wildlife and cultural heritage of the National Park.
- To promote opportunities for understanding and enjoyment of its special qualities.

The Park Authorities also have a duty to foster the social and economic well-being of local communities within the National Park.

AONBs are designated to conserve and enhance the natural beauty of the AONB.

The Cotswolds Conservation Board is modelled on the Park Authorities and has virtually identical purposes and the same socio economic duty, but a much smaller financial settlement.

While most of the National Parks are relatively remote, sparsely populated upland landscapes, in 2010 the Government designated the South Downs National Park, combining two existing AONBs. The South Downs National Park is very comparable to the Cotswolds in size, population and landscape type. The South Downs National Park Authority receives approximately twenty five times the central funding of the Cotswolds AONB.

Within a National Park the Park Authority is the local planning authority whereas the constituent Local Authorities are the planning authorities in an AONB.

4. Investment in the Environment

Q: Is investment in the environment a priority for Government?

A: In January 2018 the Prime Minister launched the government's 25 Year Environment Plan. It highlighted the priority of the environment and that the natural environment was our most precious inheritance. It emphasised the government's plan for our generation to become the first generation to leave the environment in a better state than we found it and pass on to the next generation a natural environment protected and enhanced for the future. It recognised that farming and forestry land uses are vital industries and that they shape our landscape.

The plan identified the designation of National Parks and AONBs as among the outstanding environmental achievements of the past 100 years.

5. Boundaries of any National Park

Q: Is there any intention to undertake a boundary review?

A: The legislation at present would require a complete review of any new Park boundary. However, there is an alternative idea, that a new Park might adopt the existing successful

AONB boundary (dating from 1990) and operate for a period of time to that boundary. There could be a review of the boundary after 5 – 7 years of the Park operating, enabling discussions for any boundary changes to be based on the local day to day experience of the Park designation and Park Authority.

The current Cotswolds AONB boundary is based upon an assessment of landscape qualities dating from 1988 - 1990. It is a coherent natural historic landscape based boundary and does not adopt county, unitary, district, borough or parish administrative boundaries.

The Glover Review may well recommend changes to the current lengthy arrangements for reviewing boundaries of National Parks and AONBs.

6. The difference a Cotswolds National Park would make

Q: What differences would there be after 5 - 10 years if the Cotswolds were to become a National Park?

A: In summary a Park Authority would aspire;

- A single Local Plan leading to consistent planning policy formulation based on the needs of the Cotswolds and implemented for the area as a whole;
- A more effective and influential landscape led Management Plan for the Park, linked to the single Local Plan;
- Management of the landscape as a whole, resulting in improved enhancement of the landscape and a reduction in the erosion of landscape quality;
- Application of Natural Capital and Cultural Capital to resource management across a whole landscape;
- Design and consistent local delivery of a single integrated rural development and agri-environment scheme;
- Consistent high quality development design and the use of materials appropriate to the area;
- Joining up of multiple advisory services and funding streams for communities, farmers and landowners;
- To enable and lead effective networks for collaboration, co-ordination and delivery with landowners, farmers, businesses and communities across the Park as a whole;
- To experiment and trial new, innovative and entrepreneurial initiatives;
- Enhanced and consistent sustainable visitor, tourism, recreation and quiet enjoyment policy development and implementation across the area;
- Co-ordination and delivery of sustainable visitor and tourism management for the whole area;
- Improved and consistent management of the whole rights of way network, including design and use of materials appropriate to the Cotswolds;
- Stronger local, national and international brand for the area and the businesses that operate within the area and depend on the brand;
- Clearer identity for the area and the communities living within it, inspiring even greater pride and value in the quality of the landscape and environment;
- More appropriate resourcing and financing settlement for the size and scale of the protected landscape;
- Improved ability of urban communities in the West Midlands, Avon and outer London to access, explore and enjoy their nearest National Park, delivering in parallel significant health and well-being benefits to those diverse populations.

7. Local involvement

Q: What plans are there for public consultation?

A: Natural England as the national adviser on landscape and protected landscape designations would review the case for a new National Park, make recommendations to Government and there would be a full round of consultations as they deemed necessary. The Cotswolds Conservation Board already has a programme of engagement with stakeholders in train, which will continue.

8. Local residents and communities

Q: What would a National Park mean for local residents and communities?

A: The answers in section 2 and 6 outline the potential benefits of a Cotswold National Park, many of which would be benefits to local residents and communities living and working in the Park.

In summary it is envisaged that a Park Authority would:

- Provide strategic plans with clearer sets of planning policies, based upon the needs and capacity of the Cotswolds,
- Proactively pursue local neighbourhood plans and the provision of affordable housing,
- Improve the co-ordination and management of visitor and tourism provision for the Cotswolds as a whole,
- Secure more resources for the improved care and management of the landscape and recreation infrastructure e.g public rights of way,
- Advocate and support investment in appropriate economic growth and jobs.

9. Contribution of the National Park to wider society

Q: What can a National Park designation contribute to the needs of wider society?

A: A national report in 2017 jointly sponsored by Public Health England and the National Park Authorities showed clear opportunities for beautiful landscapes to contribute to improving the physical and the mental wellbeing of the population. Cotswolds GP surgeries are already starting to use social prescribing linked to short local walks. The natural beauty and tranquility of a National Park would offer significant health and well-being benefits to communities living in the Park and those larger urban communities living within easy reach of the Park, building on the existing innovative work with the Princes Trust and with inner city Gloucester women's walking groups.

10. Democratic representation on a National Park

Q: What model of governance is likely to be adopted?

A: Traditionally a Park Authority comprises no less than 40% Local Authority appointees, at least 20% Parish appointees and up to 40% Secretary of State appointees. Thereby at least 60% of the Park Authority comprises locally elected appointees. The Secretary of State

appointments process enables the recruitment of national expertise relevant to the protected landscape, expertise that would not step forward to join a local authority. This is the same model as the current Cotswolds Conservation Board.

The Park Authorities regularly have a series of networks or mechanisms to engage and work with local communities, farmers and landowners e.g. Neighbourhood Plans, farmer cluster groups, whole estate plans.

The opportunity could be taken to explore alternative arrangements e.g. including appointees resulting from direct elections onto the National Park Authority.

11. A Precept or Levy

Q: Would there be an intention to precept or 100% fund from a central government grant and other miscellaneous sources?

A: National Parks are currently funded 100% via the government department, Defra, (Department for Environment, Food & Rural Affairs). The Park Authorities have retained their earlier precept or levying powers although these are not used. The precept power enables Parks to reclaim Vat, unlike Conservation Boards.

A National Park would look to add to its main Defra settlement by seeking and applying for other grants. Parks have been successful in securing investment from the Heritage Lottery Fund, government departments e.g. MHCLG, (Ministry of Housing, Communities & Local Government), government agencies e.g. Natural England and private sector companies. Additional funding programmes include historic building restoration grants, cycle access infrastructure grants – working as individual Parks, groups of Parks or in partnership with other organisations. The Cotswolds Conservation Board also works in this way.

The Park family has recently been working to secure private sector sponsorship, with the most recent example of success being their national programme with the Columbia outdoor clothing company – leading to savings in the Parks' operational budgets.

12. Additional red tape

Q: Won't a National Park simply lead to more red tape and become a blocker on development and innovation?

A: Whether an area is designated as a National Park or as an AONB, the same issues of development control and strategic planning need to be addressed. Arguably, having these determined through a single local plan will create significant opportunity to reduce bureaucracy.

National Parks are living, working landscapes that support rural communities. Farming and planning systems have both led to the recognition, designation and celebration of our National Parks. The Park Authorities have a formal duty to foster the social and economic well-being of local communities within the National Park. Both National Parks and AONBs are afforded the highest status of protection and government policy is that major development should only take place in exceptional circumstances.

As the single South Downs National Park Local Plan is finalised there is a dramatic reduction in the number of planning policies across the area, the result of a single plan looking at the one landscape compared to multiple local plans led by a number of local authorities. Planning policy is clearer and less bureaucratic.

13. Planning powers

Q: What are the preferred arrangements for dealing with planning applications in a National Park area?

A: Traditionally a National Park Authority is the planning authority for the Park area and delivers planning services direct. The South Downs National Park operates a different model. There is a single strategic Park wide Local Plan and Park wide Management Plan. Most planning delivery is delegated to local authorities, with an annual rolling contract between the Park Authority and individual authorities. How such an approach might work in the Cotswolds would be the subject of discussions between the Conservation Board, Defra, MHCLG, Natural England and the constituent Local Authorities.

Within the South Downs National Park the Authority:

- compiles the Local Plan and Management Plan for the National Park;
- works with the County and Unitary Councils to agree joint Waste & Minerals Plans;
- determines all waste and minerals applications;
- compiles design guidance for application when determining planning applications;
- informs and substantiates the housing needs of the Park and its communities;
- delegates the delivery of development control to 5 district councils, (Section 101, Local Government Act 1972);
- monitors the delegation of the delivery of development control and can decide to call in an application for determination by the Park Authority.

The South Downs National Park Authority currently receives circa 4,400 planning applications a year. It determines circa 1,125 or 25% of these as a Park Authority, with the remaining 3,375 or 75% determined by the local authorities under the delegated arrangements.

The South Downs Park Authority has seen the number of planning applications remain the same compared to before the Park. However the Park Authority believes that the quality of the applications has risen due to the designation of the Park and provision of more specific and detailed planning guidance. Applicants recognise that the Park landscape requires a higher standard of application and planning proposal. The Authority has championed the value of local Neighbourhood Plans, of which there are currently 53 in the Park area, which help identify the need for new housing and development.

The South Downs Park Authority determines 90% of the major planning applications, with major defined by the scale of an application, the sensitivity of the location and the uniqueness of the application.

In general the larger authorities have opted to deliver planning services under a delegated arrangement whilst those authorities with only a small part of the Park or very few planning applications in the Park have opted for the planning function to be delivered by the Park Authority.

A Park Authority would seek to achieve consistent high level planning policy and implementation for the area as a whole.

14. Development plan

Q: With the requirement that a National Park prepares its own local plan what will be the relationship between the adjoining local authorities and any such local plan? Will the local plan have due regard to the policies in the adjoining local authorities?

A: A “duty to cooperate” already exists between National Parks and neighbouring Authorities. The Park Authority would compile the Local Plan for the National Park, and work with the County and Unitary Councils to agree joint Waste & Minerals Plans. It would in addition compile design guidance, mindful of the differing elements applicable to the different areas within the park, for use by applicants and when determining planning applications.

It would clearly set out Park specific policies to guide applicants and for use when determining planning applications.

In respect of the adjoining local authority local plans and core development plans the National Park Authority would work in partnership with the local authorities to understand their housing needs.

Within its draft local plan for the Park the South Downs National Park Authority is advocating circa 700 policies for the Park. This is a significant reduction from the circa 1500 policies currently used by the local authorities across the Park area.

The National Planning Policy Framework (NPPF) advocates that there should be plans for the enhancement of natural capital at a catchment or landscape scale across local authority boundaries. The National Park Authority would be ideally placed to develop such a plan for the Cotswolds.

15. Housing growth implications

Q: Will there be any implications of a National Park designation on housing growth? For example, as district councils have area wide housing growth requirements, will the part in the National Park within the district be expected to make a commensurate contribution?

A: The Park Authority would inform and substantiate the housing needs and housing capacity of the Park and its communities and reflect these in the Local Plan.

Government policy means that National Parks are not subject to top down housing allocations or the proposed standard methodology of assessing housing need. Their purposes require them to consider the economic and housing needs of the community living in the Park with particular emphasis on affordable housing.

The South Downs National Park Authority’s draft local plan is proposing 250 new homes a year, distributed or dispersed across the Park, with 125 or 50% affordable houses. This compares to the average of 250 homes a year in the twelve years before Park designation. The housing growth is similar to the past but with far greater emphasis on affordable housing

needs. The housing numbers are based on local need and the capacity of the landscape to accommodate growth without development having a detrimental impact on the Park.

Research led by the Campaign for the Protection of Rural England (CPRE) in autumn 2017 identified the Cotswolds as one of the AONBs under the greatest development pressures nationally.

The practice of the Cotswolds Conservation Board has been to support the proportionate organic growth of its communities with support for both housing and employment where they do not conflict with the core purposes of the AONB designation and Conservation Board.

16. Property values and housing affordability

Q: What consideration is being given to housing affordability issues in a new National Park?

A: The National Planning Policy Guidance under Natural Environment/Landscape refers to the English National Parks and Broads UK Government Vision 2010 for information on National Parks. It states: “The Government recognises that the Parks are not suitable locations for unrestricted housing and does not therefore provide general housing targets for them. The expectation is that new housing will be focused on meeting affordable housing requirements, supporting local employment opportunities and key services.”

The Cotswolds are already well known both nationally and internationally and the area has good access to London, Bristol and Birmingham. As a result the area is extremely popular, market housing prices are relatively high and there are significant numbers of second homes. It is not envisaged that National Park designation would therefore lead to any significant increase in house prices.

17. Balance between recreation and quiet enjoyment

Q: While it is recognised that the Cotswolds already is a major visitor destination which helps support the rural economy, a National Park could attract more visitors. Therefore what balances are being sought between retaining the character of the area and balancing increased demand for visitors?

A: National Park Authorities in England have the following two purposes:

- to conserve and enhance the natural beauty, wildlife and cultural heritage of the National Park;
- to promote opportunities for understanding and enjoyment of the National Park’s special qualities.

If there is a conflict between the two purposes the conserving and enhancing purpose takes priority, known as the Sandford Principle. The ongoing National Parks and AONB Review may consider experience from Scotland, where the socio economic duty is elevated to a purpose. The Scottish Parks also have a fourth purpose: to promote sustainable use of the natural resources of the area. A Cotswolds National Park might aspire a bespoke model for the Cotswolds, it could:

- improve co-ordination of recreation, quiet enjoyment policy development and provision of services,
- achieve greater co-ordination and delivery of sustainable tourism for the Park area as whole,
- improve and lead a consistent approach to the management of the rights of way network, including the design and use of materials appropriate to the Cotswolds.

18. Rural diversification

Q: What would be the implications on farm diversification, reuse of farm buildings to other businesses and renewable energy projects?

A: National Park Authorities have a range of relevant and positive case studies. They also have a clear duty to foster the social and economic well-being of local communities within the National Park and regularly champion sustainable rural development.

The Park Authority would inevitably look to join up the multiple advisory services and funding streams; enable and lead effective networks for collaboration, co-ordination and delivery with landowners, farmers, businesses and communities across the Park as a whole; and experiment and trial new, innovative and entrepreneurial initiatives in order to aid and support appropriate rural diversification.

The Cotswolds Conservation Board is the only protected landscape organisation in England to be operating as an Accountable Body for a LEADER programme, an approach a National Park would look to develop. The Cotswolds LEADER programme is investing circa £1.7m in local growth and jobs.

Research in 2013/14 identified that the Cotswolds AONB designation generated £337m gross value added economic activity a year and that 9,720 jobs were critically dependent upon the high quality landscape and environment of the AONB. The Cotswolds AONB and any potential National Park is far more than just a nice view.

19. Environmental payments for farmers

Q: How might a National Park impact on environmental payments to farmers?

A: The future Environmental Land Management Scheme (ELMS) and proposed payments for public goods and services are still being developed by government. Dating back to the Cotswolds Hills ESA, farmers have been strong participants in various agri-environment schemes and the current Cotswolds LEADER (economic growth and jobs creation) programme. The operation of future schemes will be dependent on there being sufficient funding available and if not, whether some landscapes are prioritised.

The current National Park family have regularly been prioritised for various programmes and pilot projects e.g the current Payment by Results agri-environment trials in the Yorkshire Dales.

The Conservation Board has proposed that the Cotswolds AONB is a pilot area for any new Environmental Land Management Scheme in view of its understanding of landscape, agriculture and communities in its protected landscape.

20. Rural economy adjacent to the National Park

Q: The Vale of Evesham is a working landscape dominated by the horticultural sector which is vital for the economy of the sub region. Are there any implications for such areas as a result of National Park status? What would be the implication of any designation in economic development terms for adjacent areas if growth is restricted because of the impact on the National Park?

A: Any National Park would be a living, working landscape - as it is now for the Cotswolds AONB - with various associated initiatives, as evidenced in the answers to questions 18 and 19 above. It should not adversely impact on the economy of neighbouring areas.

A National Park could well provide a stronger local, national and international brand for the area and the businesses that operate within the Park area or adjacent to it.

21. National Park branding

Q: How might a National Park brand help the Cotswolds?

A: National Park is a title used across the world. It is generally acknowledged that the term is better understood and appreciated than England and Wales specific designations such as AONB, even if a Park in one part of the world is significantly different from another part of the world.

It is a brand that the wider population recognises as identifying the importance of the high quality landscape and the recreation opportunities it provides. Given this greater recognition it is envisaged that the National Park brand would be of greater value and interest to a variety of public, private and charitable sector companies and organisations – even for an area as well known as the Cotswolds. Local products and produce from the National Park in particular might benefit from a Park brand.

22. Pressure on local infrastructure

Q: Whilst the Cotswolds is a popular visitor and tourist destination at present, what would increased visitor numbers look like, and what additional strain would this put on travel infrastructure – particularly the Cotswold rail line and major roads e.g. A46 and A417? Would National Park status reinforce lobbying for the doubling of the Cotswold line, would Park status lend additional support for improvements to the A46 and A417? Is there a risk that designation might see withdrawal of infrastructure improvements on the basis of impact on the National Park?

A: Cotswold AONB is in a fortunate position of already having good rail and road infrastructure linking its protected landscape to communities and urban populations.

A National Park would seek to positively influence the delivery of appropriate infrastructure improvements. Given that the Park would be designated for the quality of its landscape, the Park Authority would seek a landscape-led approach to any infrastructure improvements, in simple terms the right improvements in the right place.

National policy e.g the National Planning and Policy Framework and associated guidance would also apply to any such infrastructure schemes.

23. Evidence base

Q: What is the evidence from elsewhere of the benefits of National Park status?

A: Consideration of the arguments for and against a Cotswolds National Park must be underpinned by evidence. The gathering of specific evidence is on going and has been included where appropriate in the answers above. Lessons are being learnt and evidence requested from Defra, Natural England, existing National Parks and other organisations with experience of National Parks.

There are 15 local authorities spread across the South West, South East and West Midlands regions with territory in the Cotswolds AONB. This does make aspects of consistent evidence gathering, data collection and interrogation for the whole area more challenging.

24. Why not simply retain the Cotswolds AONB

Q: Why designate a Cotswolds National Park to replace a Cotswolds AONB?

A: Whilst the AONB has the same landscape status as a National Park it is a poor cousin from a policy, practical delivery and resourcing perspective. As evidenced through the questions and answers above, the National Park offers a better designation and management arrangement for the consistent delivery of policies and decision making across the whole landscape. It is the best available option for securing the long term future of the Cotswolds landscape, environment and everyone living and working in this very special area.

The Cotswolds: a new National Park?

Two hundred million years ago, when the supercontinent of Pangaea was breaking up and the Gulf of Mexico was forming, nature was quietly doing something just as extraordinary in the area we now know as the Cotswolds. In a shallow sea - inhabited by huge dolphin-like creatures - fragments of shell and grains of sand were being swirled, layer upon layer, until they reached the size of a pinhead. These were the ancestral particles of oolitic limestone - 'oid' or egg-like in structure; a limestone ribbon that binds the Channel coast to the North Sea.

The most magnificent of this limestone underlies and defines the Cotswolds AONB. This is the stone farmers unearthed to build mile upon mile of drystone wall, shielding their extravagant-fleece sheep and mahogany cattle. This is the stone that built honeyed cottages and awe-inspiring wool churches; that was used by Sir Christopher Wren for his masterpiece, St Paul's. It's the stone that the weather eroded to create a rolling landscape of secret valleys - so isolated, the people there kept their own accents deep into the 20th century - and view-stealing hills.

The industrial revolution so passed the Cotswolds by that, even today, it represents quintessential England, sealed in a vernacular for residents and visitors alike.

We don't have another 200 million years to create another Cotswolds.

This opportunity, for a new National Park, is as golden as Cotswold stone itself.

The Cotswolds' rolling landscape is every bit as stunning - equally as precious - as other British gems holding National Park status. What's more, it's unique; there is nowhere else on Earth like it.

That beauty is not simply characterised by the 'warm and luminous' (as JB Priestley put it) thatched cottages, with apricot cupped-roses wrapped round their doors, clustered beside a village green. Nor the acres of flower-rich grassland, grazed by free-roaming cattle, spotted with wild orchids (bee, frog, early purple, pyramidal) and dotted by rare Duke of Burgundy, Chalkhill Blue and dark-green Fritillary butterflies. It's not the show-off (but spectacularly picturesque) ancient manors, built by prosperous medieval merchants who waxed fat on the Cotswolds' famous sheep; nor the purling rivers or clear trout streams that cascade down hillsides, once to power the mills. It's not the age-old beech and oak woods that, each spring, saturate the air with wild garlic and shade the ground with the densest of bluebell-blue.

It's not even the mile upon mile of winding lane - so narrow even the odd passing tractor seems to breathe in - where you can meander for hours without seeing a house or another passing soul.

No. It's *all* of these things combined - villages, market towns, remote slopes and giddy peaks - alongside the people: the very real people who make their home in, work in, love and care for the Cotswolds as a true living landscape.

If the above sounds too Edward Thomas, too Laurie Lee, there are reasons for that. Firstly, if you've ever been to mellow Broadway, or overlooked a steep-sided Lypiatt valley (perfect for the old Cotswold pastime of pichy powlin), or flown a kite high among the dilly dumps of Minchinhampton Common, you'll understand that the Cotswolds genuinely does inspire poetry. It prompts gasps of pleasure at the view around a bucolic corner; at a broad expanse of terraced houses where the stones look as if they've captured the very sunlight within their crevices; at a Neolithic barrow dominating an almost-empty plain. There aren't too many places left that do that nowadays.

But don't think that beauty protects the Cotswolds from 21st century threats.

To take one iconic example: the Slad Valley in Stroud - made famous by *Cider With Rosie* - most recently came under threat from a speculative developer. That literary heritage cut no ice with the applicants. As the planner in charge explained, the would-be builders' first question was to ask (with knowing irony) where Laurie Lee's name appeared on the local plan.

In other words, Lee's 'tangled woods and sprawling fields' might inspire overwhelming emotion, but no amount of emotion will protect them in the long run.

And the demands are present and clear:

- **Housing:** in 2017, CPRE's review of housing in England's ANOBs identified the Cotswolds as one of the most pressurised protected landscapes;
- **Infrastructure:** in the form of Highways England's A417 Missing Link and Network Rail's Great Western line electrification;
- **Population and visitors:** 150,000 residents and 23 million day-visits a year.

People love the Cotswolds. City-escapees - more and more of them, as pollution increases - are attracted by the region's accessibility and communication networks. Visitors, from home and away, flock in upward numbers.

Who can blame them? But, as a counter-balance, there needs to be an overview; a way of pulling together the current fragmentary decision-making process; a means of analysing Cotswold attributes and formulating a consistent and knowledgeable way of taking them forward. A fair method, in other words, of protecting the interests of residents, of visitors, of incomers; and of the hills and valleys, the flora and fauna, the mellow streets and the babbling streams, while allowing the future a pathway.

Let's look at a few more salient facts.

In 1966, the uniqueness of the Cotswolds' long-acknowledged beauty was formally recognised by its designation as an Area of Outstanding Natural Beauty (AONB): at 790 sq miles, it is the largest of the AONBs and the third largest Protected Landscape in England after the Lakes and Dales National Parks.

The Government makes no distinction in the quality of beauty required of an AONB and a National Park; to put it another way, the Cotswolds - with its stunning market towns, breath-taking villages, and still-tangible remoteness of settlements - is as much a beating heart of Englishness as any of its more closely-protected cousins.

The problem is, the Cotswolds has no neat boundaries; its escarpment to the west, its dip-slopes and valleys of the east; the majesty of Bath in the south and the mellow charm of Chipping Campden in the north: these treasures meander over 15 local authorities, five counties and three regions.

Let's be frank. Without National Park status, this diversity of governance undermines the whole vision of the Cotswolds' original, enlightened designation as a highly-valued landscape.

With National Park status, on the other hand, the Cotswolds would see:

- **A more coordinated, consistent, sustainable and dynamic approach to management, putting conservation, beauty, understanding and enjoyment at the heart of decision-making;**
- **A better focus on existing and pressing needs, such as affordable housing, local employment, sustainable farming, tourism, forestry, and the well-being of communities;**
- **Enhanced public understanding and engagement: we know for a fact that people all over the world more readily understand and appreciate the title 'National Park'.**

Nobody wants to stifle the Cotswolds. In fact, most people want the opposite. For despite its traditions - the Cotswold Olimpick Games with its shin-kicking and torchlight procession; the insanity of cheese-rolling; the huffing, puffing woolsack races - there's plenty of innovation going on. A recent non-profit organisation is Rock the Cotswolds, set up to show off the 'cool' side of the region. There are the diversifying farmers producing world-standard cheese, drink and cured meat (among other produce). Giffords Circus has breathed new life into village greens with its internationally-revered touring shows. And don't forget the industrial heritage and current cutting-edge factories: the jet engine was invented here; companies such as GE Aviation are continuing to lead the market.

This application - this plea - to consider the case for National Park status looks in three directions at once. It looks to honour the past; it looks to acknowledge the needs of the present; and it pledges its troth to the future, just as the current Government has vowed. This Government wants to be the first to leave the environment in an improved state for the next generation. There can be no better start than with the Cotswolds.

Now for the very good news. This new National Park would have a head start.

The current Cotswolds Conservation Board - whose members work to conserve and enhance the natural beauty of the AONB; to increase the understanding and enjoyment of its special qualities; and to foster the socio-economic well-being of its communities - is already modelled on a National Park Authority. It would be a small step to adapt to National Park status.

A small step - but a giant leap for the Cotswolds.

Think of it: one body, delivering a sustainable, joined-up, environmental, ecological and economic plan; gathering together the current fragmentation to lead, advise and invest, as one, in all the elements that help the Cotswold countryside and its associated settlements to thrive. A National Park leading the way in sustainable rural development, championing rural skills, welcoming and educating visitors; and, above all, protecting through expert and appropriate development design, the landscape, biodiversity and vernacular of the region for all time.

The advantages would be manifold for the Cotswolds, for England, and for the many millions who continue to enjoy one of the most beautiful, distinct, idiosyncratic and desirable parts of the globe.

One grain of sand was all it took to begin to build the Cotswolds.

One courageous decision is all it would take to mark the start of a whole new future.

December 2018