

Glover review of National Parks and Areas of Outstanding Natural Beauty (AONBs) call for evidence.

Questions 1-6: captured name of organisation submitting the response etc

Part 1 - Opening thoughts

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

- National Parks, Conservation Boards and AONB Partnerships generally deliver a good product. We demonstrate collaborative and creative links to people within our Protected Landscape and its setting. We work to ensure people want to visit and use the area beneficially. There is more we could do.
- AONBs and National Parks look at landscape as a single coherent unit, particularly important where a protected landscape is divided across several local authorities. Landscape follows natural boundaries, not administrative or political boundaries. This approach is strongly supported by a single management plan and for National Parks and Conservation Boards independent governance body. Our role must engage communities and people with every aspect of our landscape, enhancing their sense of place and lifestyle.
- Grant funding for both AONBs and National Parks direct from Defra rather than the AONBs being funded via Natural England has worked extremely well. There has been a greater consistency of approach to funding reductions or inflation increases across the family.
- Defra pays the Conservation Board quarterly in advance and the overall claims and payments process is far easier and more efficient when compared to the previous AONB grants system operated by Natural England or the current system for Natural England grants to support National Trails.
- The Conservation Board governance structure is modelled on National Park Authorities and offers significant advantages over a local authority hosted AONB partnership e.g:
 - an independent and stronger voice,
 - statutory consultee status on national infrastructure projects,
 - same two purposes and socio-economic duty as the National Parks
 - greater financial management flexibility,
 - Board membership including parish and Secretary of State appointees, attracting a diverse skills set, linking to local people, one that wouldn't be attracted to a local authority hosted structure,
 - not for profit status, though working in an effective commercial way,
 - a more transparent and rigorous decision and policy making process.
- The advantage of the Conservation Boards and Park Authorities include:
 - the mix of local and national appointees, resulting in a strong quality of debate and decision making,
 - national appointees reinforcing the national importance of such landscapes,
 - a more independent voice,

- clarity of purposes and resulting focus of decision making, policy and programme delivery.
- National Parks operate a single Local Plan alongside a single Management Plan, with both plans supporting each other from a policy perspective, leading to more effective plan delivery and implementation.
- Defra, its agencies and Historic England currently provide a range of data cut to AONB boundaries. This is a vital component of monitoring the state of the AONBs and the success of measures to conserve and enhance the AONBs, etc. It is vital that this data continues to be provided as a nationally consistent monitoring and evidence base.

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

- The purpose of designating National Parks and AONBs is currently different. Both designations should now have the same purposes (and socio economic duty).
- There are two distinct parts of the Protected or Designated Landscapes family. Parks and AONBs operate in separate silos with separate associations within the same family.
- AONB is a poor brand name, which does not help us “sell” our offer.
- AONBs and National Parks have the same landscape status and level of protection, but the two designations are often poles apart in their ability to deliver their purposes and management plan:
 - National Parks exert more direct influence in terms of developing a local plan and determining planning applications and are taken into greater account by central Government, its departments and agencies.
 - Parks have greater capacity to engage communities and people.
- AONB Partnerships are not statutory consultees. Conservation Boards are statutory consultees for National Infrastructure Projects and Park Authorities are full statutory consultees. Conservation Boards should be full statutory consultees on planning policy and development control and Environmental Impact Assessments. AONB Partnerships do not have a legal status, which works against them being able to speak independently of their local authority host.
- Defra established the Cotswolds and Chilterns Conservation Boards but overlook their different status. Defra has no clear Conservation Board policy, despite the clear advantages offered by the Boards. When the Board concept was initially developed it was envisaged that there would be 4-6 Boards across England.
- Heritage Coasts are a forgotten part of the protected landscape family. They are defined rather than designated and the majority lie within a National Park or AONB. A limited number of Heritage Coasts are stand-alone and should also be designated.
- The National Planning Policy Framework states that National Parks and AONBs have the highest status of protection in relation to conserving and enhancing landscape and scenic beauty. However, the purpose of designation is at the heart of plan-making and decision-taking in National

Parks, whereas it is just one of many, competing considerations for local authorities in AONBs.

- The Section 85 Duty of Regard for the purposes of AONB designation within the Countryside & Rights of Way Act 2000 should be reviewed, strengthened and work in parallel with the equivalent Section 62 Duty of Regard applied to National Parks within the Environment Act 1995. The “have regard” requirement is not strong enough. It is relatively easy for the public sector to show that it has had regard to the AONB when it has not meaningfully done so.
- The application of S85 and S62 to private sector utility and infrastructure provision companies should be considered.
- Protected Landscapes can be hindered by other legislation, policies and incentives contradicting or over-riding the purposes of National Park or AONB designation. The decision to remove and reduce government guidance should be reviewed / reversed e.g. withdrawing Defra’s guidance on the Section 85, the Duty of Regard in AONBs has led to a lack of clarity on how national policy should be applied or interpreted.

Part 2 – Views

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

- Nature conservation and biodiversity are important. There is often a high level of co-incidence between high quality National Park and AONB landscapes and nature conservation and biodiversity sites.
- The Cotswolds AONB contains 89 SSSIs, 3 NNRs and 5 SACs. It is also adjoined by 2 World Heritage Sites. Despite our Conservation Board governance structures having little land ownership or direct control / management of conservation and biodiversity sites we could play a bigger enhancing role. Currently we do not have the tools or statutory role.
- Evidence suggests that at a national level the condition of biodiversity within National Parks and AONBs is not significantly different from outside a Park or AONB. However the Parks and AONBs are essentially advisers. They can help incentivise where they have captured resource with which to offer additional advice or grant. This should change.
- The Parks and AONBs are not in control of the main day to day incentives or measures to impact on such sites. These essentially lie with Defra, Natural England, Forestry Commission, Environment Agency and the Rural Payments Agency. This should change.
- Insufficient use has been made of AONB evidence by Defra and its agencies, in particular Natural England, when determining agri-environment investment e.g the lack of use of the Conservation Board’s Management Plan, Landscape Character Assessment and Landscape & Strategy Guidelines. The targeting of investment and outcomes for biodiversity could be more effective. Such evidence is recognised as being national best practice by organisations such as the Landscape Institute but not fully recognised by Defra and its agencies. Defra has invested via the Conservation Board in creating such evidence and

advice but is then not making best use of such investment. Instead Defra, Natural England et al reinvent similar but separate evidence.

- AONBs, Conservation Boards and National Parks could play a more integral part in the delivery of the Environmental Land Management Scheme (ELMS) and payment for public goods and services system and make full use of local evidence if they were seen as an integral part of the wider Defra family or trusted local partner. If such an approach were applied significant progress towards the delivery of the 25 Year Environment Plan would be achieved.
- Defra, Natural England and the Forestry Commission have the legal ability to delegate to National Parks, Conservation Boards and the local authorities hosting AONB Partnerships, but rarely appear to do so at present.
- The Local Nature Partnership (LNP) programme was initiated by Defra. Establishing LNPs that overlap with and duplicate the statutory role of National Parks, Conservation Boards and AONBs is confusing to professional staff and the public and wastes scarce financial and staff resources. LNPs should not be necessary for Protected Landscapes if the Parks, Boards and AONBs are fulfilling their purposes.
- Parks and AONBs are ideally placed to co-ordinate and lead landscape scale bio-diversity enhancement projects, as reflected in the Board's Magnificent Meadows and Glorious Cotswolds Grasslands initiatives.

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

- National Parks and AONBs play a key role in conserving and enhancing the most valued landscapes in England; both natural and cultural capital, which underpin much of what people most value in protected landscapes.
- National Parks and most AONBs have undertaken Landscape Character Assessments and local distinctiveness analyses, providing a better understanding of the landscape, its features and special qualities. This is reflected in landscape strategies, guidance, advice and policies within management plans and National Park local plans; and in targeted action through projects on the ground.
- Such guidance is used by consultants in their Landscape and Visual Impact Assessments (LVIAs) of proposed developments in Parks and AONBs. However the quality of LVIAs is variable. Through their planning role National Parks are in a far better position to ensure that LVIAs meet relevant professional standards set by the Landscape Institute.
- The status of Parks and AONBs has helped attract support from the Heritage Lottery Fund (HLF) for a variety of landscape and cultural projects. HLF has become an even more important supporter of Park and AONB programmes as Defra and Natural England funding has declined.
- The Board has been a lead applicant for Cotswolds specific people and community focussed projects e.g. Caring for the Cotswolds and at other times a supporting delivery partner within a national enhancement project e.g. Save our Magnificent Meadows.
- Through capturing additional financial resource from HLF, mitigation monies from a National Grid gas pipeline and a Caring for the Cotswold Visitor Giving programme the Board has been able to offer a range of grants to landowners

and communities for dry stone walling, wild flower meadow restoration and creation, access improvements and species conservation.

- The Cotswolds Conservation Board has developed a highly successful rural skills programme which is virtually self-funding. It offers circa 70 courses a year attracting over 500 participants on a selection of 14 different courses. The programme ranges from initial “have a go” courses to accredited training in walling and strimmer/clearing saw use, through to a growing schools programme.
- The Board also partners the National Hedgelaying Association with a well-established annual hedgelaying competition.
- At a strategic planning level, National Parks are much better paced than AONBs to ensure that historic patterns of settlement and landuse that contribute to the historic character of protected landscapes are conserved.
- The difference in planning functions means that AONBs are less able to ensure consistent and effective landscape-wide delivery of heritage benefits through sustainable development e.g. conserving rural settings abutting historic Conservation Areas in relation to new development.
- The discrepancy of resourcing means that most Parks have dedicated heritage officers/archaeologists whereas AONBs do not and are therefore far less able to deliver consistent advice and decision-making to conserve and enhance heritage objectives.
- Parks and AONBs have a good track-record and are ideally placed to co-ordinate and lead landscape-scale heritage enhancement projects, including monuments at risk monitoring and restoration works; enhanced public access; and heritage aspects of the new Environmental Land Management Scheme (ELMS).

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

- Farmers and land managers shape our landscape and our communities. The post Brexit challenges of Climate Change and Biodiversity necessitate they are supported and work collaboratively with trusted local partners who understand their needs, drivers and the landscape in which they operate. Working together we can enhance Parks and AONBs for future generations.
- Consideration should be given to the Parks and AONBs having a direct role in advising and guiding farmers on applications for the Environmental Land Management Scheme, ELMS.
- Support should be better tailored to the features of special significance to each Protected Landscape.
- Any new scheme advanced by Defra should not be solely focussed on environmental issues, but also address business and rural development, thereby creating a single integrated funding scheme for the rural sector. Such an approach is important given:
 - the lack of investment made via the LEPs in the small to medium scale rural economy,
 - that farm business investment can provide environmental gains e.g zero or much reduced tillage,

- the need to see life from the perspective of the applicant and reduce the number of separate silos of funding,
- it appears that rural LEADER programmes could be amalgamated into the proposed Shared Prosperity Fund, to be delivered via LEPs in future.
- ELMS should be informed by and contribute to the delivery of the Park and AONB management plans, guidance and advice. The best approach to this is for ELMS to have specific targets to deliver for the AONB and National Park and for the scheme to be delivered locally.
- The Conservation Board has advocated to Defra a locally designed and delivered ELMS / Rural Development programme and has suggested that such an approach is piloted in the Cotswolds. This submission has been developed through liaison and partnership with the local farming and landowning community.
- The Board has previously assisted Natural England in hitting its Stewardship targets by offering advice and working with farmers and landowners to submit applications, often focussing on the most challenging applicants and sites, with high levels of success.
- The combined ELMS / Rural development proposal is based on the Board's experience of working directly with farmers and landowners over Stewardship applications and being the Accountable Body for the Cotswolds LEADER programme.
- As indicated in section 9 the Parks and AONBs often have a range of evidence that could be used far more to guide grant investment decisions. AONB and Park evidence and policies should guide decision making to a far greater degree than at present. That would lead to more consistent, informed and transparent decision making.
- The Board's members are drawn from the local community, with parish and local authority appointees in particular drawn from farmers and landowners. Their ambitions in this area are strong, they wish their engagement to leave an enhanced landscape in a productive way for future generations.
- The Board operates an Annual Farming Forum, with guest speakers exploring a range of timely subjects of interest to the farming and landowning community.

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

- The statutory purpose of designating an AONB is not to provide for enjoyment or the understanding of the special qualities of the AONB. However most AONBs have to take account of, and to varying degrees provide for, recreation and enjoyment.
- Most National Parks are the Access Authority. Access is therefore managed coherently across the Park, leading to policy and practice benefits for landowners, walkers, riders and cyclists.
- The two Conservation Boards were given the same understanding, enjoyment and recreation purpose as the Parks, are managing AONBs but are not the Access Authority.

- Consideration should therefore be given to National Parks and AONBs having the same purposes.
- The Conservation Boards have a series of concurrent functions shared with local authorities e.g sections of the Open Spaces Act 1906, the National Parks & Access to the Countryside Act 1949, the Highways Act 1980, the Wildlife & Countryside Act 1981. These include the management of rights of way, provision of camp sites, provision of country parks, access agreements etc. However, the Board has never been resourced to be able to fully support or enhance access and recreation.
- The strong volunteer arm of the Conservation Board, over 300 active Voluntary Wardens, undertake practical work on rights of way and lead an extensive guided walks programme. Local Authority funding for access and rights of way has reduced significantly since 2007/08. More is being asked and expected of the Board and Voluntary Wardens to maintain the rights of way system. Volunteers, the community and individuals gain from this work, but we should not overload volunteers.
- The Board leads the management of the Cotswold Way National Trail. Grant aid from Natural England has reduced by 70% since 2008. As a result the Board's associated staff resource has had to shrink from 2 FTEs staff to a 0.5 FTE. Voluntary Wardens invest considerable effort in maintaining the trail, however this voluntary effort is not recognised as a legitimate match for drawing down trail funding.
- Very often information providers do not look at the whole AONB or pay sufficient attention to the perspective of the customer/user. Consequently information is often issued for parts of the AONB, with the customer or user expected to assemble pieces of the whole jigsaw for themselves.
- The Board is the only outward facing organisation to look at the AONB as a whole, with its associated programme including:
 - Cotswold Lion magazine
 - Guided walks programme
 - Explore the Cotswolds by Foot, Bike Bus & Train
 - Cotswolds Discoverer Bus and Rail integrated ticket
 - Downloadable walks and trails
 - Walks and trails provided to encourage wider access e.g. walks without stiles, circular walks along the Cotswold Way.

This area is a development opportunity with appropriate investment.

- Access provision in National Parks and AONBs can deliver major benefits for physical and mental health, social cohesion and general well-being, with potentially significant savings to health and social care costs. Unfortunately this potential is not being realised due to the separation of policy from practice and opportunity.

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

- The value of the Cotswolds AONB designation is £337m a year gross value added to local businesses and 9,720 jobs are critically dependent upon the quality of the AONB landscape (2013/14 economic study). The Board has recognised the importance and value to the economy of the Cotswolds AONB

and successfully bid to deliver and be the Accountable Body for the Cotswolds LEADER programme.

- Landscape designation is often perceived as a barrier to economic growth, yet the AONB landscape is an economic driver, with the tourism industry alone worth £1bn to the Cotswolds economy.
- The Cotswolds AONB is divided across 6 Local Economic Partnerships (LEPs), none of which has a particularly strong interest in the rural economy of their area.
- Conservation Boards and Parks have a socio-economic duty; to foster the economic and social wellbeing of local communities within the Protected Landscape.
- The Conservation Board recognises the importance and value of its economy. It is the only Protected Landscape organisation that is an Accountable Body for a LEADER (socio-economic, jobs and growth programme). Local Authorities invited the Board to lead this programme, recognising that the rural economy of the Cotswolds ran across administrative boundaries and recognising the track record and governance structure of the Board for fair and transparent decision making. The programme aims to invest circa £1.7m across 80 projects and creating 90 jobs.
- The Conservation Board achieves this duty via the way it delivers its two statutory purposes e.g;
 - Through its small grants programmes e. g Sustainable Development Fund and Caring for the Cotswolds the Board invests in local community projects.
 - Through mitigation monies linked to a National Grid (NG) gas pipeline through the northern part of the AONB the Board received money from NG, which it offered as grants to landowners and communities for dry stone walling projects. In doing so it more than doubled the financial sum from NG. It also led to over 13 years of dry stone walling contractor (fte) work.
 - Through the rural skills programme the Board employs local trades and craftspeople to deliver its courses.
- AONBs should be able to access and use S106 money for conserving and enhancing and enjoying and promoting. However, most local authorities retain the money within the development and do not look to address opportunities or tackle issues in the wider vicinity.
- This proactive approach to support economic and social well-being could become a more powerful and sustainable mechanism of combatting rural deprivation in protected areas.
- As indicated in response to Q8, Circular 2010 gives National Parks a stronger remit on issues such as affordable housing and provision of local services than AONBs. Consideration should be given to amending and updating Circular 2010 to incorporate AONBs.

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

- National Park Authorities are responsible for the development of the local plan, management plan and associated policies. They are better placed to deliver their purposes.

- The Board is only a statutory consultee on national infrastructure projects. It is fully engaged with Highways England over a major road scheme, advocating a landscape led approach. This landscape emphasis would not be the case if the AONB were a local authority hosted AONB Partnership, when the highway or planning department would represent the interests of the local authority.
- The Board should be a statutory consultee on other planning matters. It is not currently and consequently the degree to which local authorities consult the Board on planning matters varies considerably.
- The Board produces the AONB Management Plan, which has related planning, transport, infrastructure and affordable housing policies and encourages the local authorities to endorse or adopt these as their own policies. However there is no obligation on the local authorities to adopt these policies.
- The Board supplements its Management Plan or advocates policies for new and emerging issues via a series of Position Statements. Addressing new and emerging issues has been well received by local authorities, partner organisations and local communities.
- AONBs have no provision for a single area-wide local plan across multiple local authority boundaries. The coverage of AONB requirements within the multitude of local, highways, waste and minerals and strategic economic plans covering a single AONB landscape and its communities is very variable.
- The National Planning Policy Framework (NPPF) potentially strengthens the level of protection for AONBs e.g. the additional sentence in paragraph 172 states that the scale and extent of development within these designated areas should be limited. The actual meaning of such statements is only likely to become clear after years of new case law. Government should develop guidance to provide extra clarity. Local planning authorities should be required to provide robust evidence of need (particularly for housing) arising from within AONB communities. They should only be allowed to allocate housing over and above this identified need in exceptional circumstances (as per the major development requirements of NPPF para 172).
- Consideration should be given to extending the remit of 'English National Parks and the Broads: UK government Vision and Circular 2010' to AONBs. Paragraph 78 of Circular 2010 is particularly relevant: *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.*
- Conservation Boards are not subject to the Duty to Co-operate under s110 of the Localism Act 2011, consequently they have far less statutory say in the formulation of a range of development plans and supporting planning documents on which housing and transport decisions are based.
- The planning role of Parks means they have a greater ability for ensuring development respects and enhances the crucial relationships between conservation areas, other designated assets and their landscape settings.

Part 3 - Current ways of working

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

- The Conservation Board's governance is fortunately provided via several quarters; people representing colleges of Parishes, Local Authority Members that link to residents and Secretary of State appointees representing the national interests of the designation.
- Local governance structures could operate within one stronger national framework, reflecting that our National Parks and AONBs have both a local and national significance and value.
- Local governance structures could implement decision making, priorities for investment, business plans and management plans within a national framework.
- The staff of Park Authorities, Conservation Boards and AONB Partnerships could be employed by a single National Parks Service. Such an approach could lead to an improved apprenticeship, training and CPD (Continuing Professional Development) programme across all Protected Landscapes. It could also lead to an improved professional career development programme for all staff.
- A national resource of specialist expertise could benefit all Parks and AONBs and offer access to expertise, knowledge and experience that Parks or AONBs would never be able to justify or afford individually.
- Parks, Conservation Boards and AONBs could share far more back office systems e.g. payroll, finance, personnel, with associated savings and efficiencies.
- At present the type of designation automatically links to specific management or governance structure e.g a National Park = a National Park Authority; and an AONB = a local authority hosted Partnership, a joint committee or an independent Conservation Board. Should we separate designation from governance type i.e. designate the landscape first and then determine the best governance structure for the particular landscape, its scale, its administrative complexity and its local circumstances?
- AONB personnel within a local authority hosting arrangement can feel constrained by the policies of their host authority, for example in pursuing additional income in an entrepreneurial manner or being able to take on apprentices. A new governance model where all protected landscapes are independent legal entities in their own right should be considered.
- There is a need to recognise that independent governance and its associated processes can have an opportunity cost in terms of resources and officer time. Any new governance structure needs to balance this opportunity cost whilst providing for adequate democratic accountability.

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?

- Parks and AONBs have largely operated as two separate families with two separate national associations. At the same time they regularly compete with each other within and between the two silos.
- The system is not efficient, it duplicates and doesn't build collaboration or trust. It does not serve the needs of people.
- The separate sub parts of the same family undermine the fact that 25% of England's landscape has been designated National Park or AONB because it is of national and international importance.
- Consideration should be given to a single association or network.
- Working via a single lead the Parks and AONBs could implement national programmes across the country e.g:
 - national awareness raising leading to greater celebration, recognition and appreciation;
 - lottery bids delivering co-ordinated programmes of conservation activity across similar habitats in a variety of Protected Landscapes;
 - engagement programmes across several Parks or AONBs surrounding an urban conurbation.
- Working collectively at a national level would also deliver efficiencies compared to a large amount of individual activity.
- Some National Parks might consider incorporating or hosting the management of adjacent small AONBs. Several AONBs within a county or in close proximity might consider a single governance organisation or unit e.g a Conservation Board.
- The National Association for AONBs (NAAONB) has a limited staff resource and depends on the goodwill of officers from individual AONBs to produce many of its national-level consultation responses. These national level responses are crucial and could save work at the local level. Having one national body, rather than two bodies that duplicate the same work, would help address this issue.
- The NAAONB is currently very cautious about challenging Defra and other government departments. Protected landscape bodies should be allowed to act as a 'critical friend' to government and allowed to express opinions that differ from government without fear of 'reprisal'.
- The key distinctions between Parks and AONBs i.e. their function relating to planning and the major difference in resources can work against collective working despite them being responsible for landscapes of the same status.

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 Cotswolds Conservation Board has an extremely strong volunteer arm, the Cotswold Voluntary Wardens, who were established in 1968 and received the Queen's Award for Voluntary Service in 2018. In 2018/19 the wardens contributed over 47,000 hours, conservatively estimated to be valued at £316,000. The 400 work parties and 300 guided walks delivered annually

have a huge cumulative effect on both the quality of the environment and the health and wellbeing of participants, both the wardens themselves and those they work with. The Voluntary Wardens also work with schools organising activities within the school and trips to farms, with an emphasis on schools in neighbouring deprived urban areas.

- Pilot work with General Practitioners based in the Cotswolds, supported by their local Voluntary Wardens, suggests that GPs are enthusiastic about Social Prescribing of walking activities to support mental and physical wellbeing. There is substantial scope to expand this work.
- In Summer 2018 the Conservation Board ran a pilot project with Young Gloucestershire, bringing the Princes Trust Programme groups into the Cotswolds. This was very successful in demonstrating that, in partnership we can do this work and that it has a significant positive effect on participants. We could do a lot more with new resources and are currently exploring options with our partners.
- Overall Parks and AONBs are poor at fully engaging with their neighbouring large towns and cities.
- The Conservation Board has Gloucester, the West Midlands, Oxford, Swindon and Bristol within easy reach via a good road and rail network. However the Board's resource base is not sufficient to run engagement programmes with these significant communities.
- If there was more resource available to coordinate volunteer work the Board could potentially engage a more diverse range of volunteers in a much wider range of work.
- There is massive scope for improving volunteering and associated public health and well-being, but this is not currently a formal function of Protected Landscapes and its co-ordination needs substantially better resourcing. We believe that there is a massive return to be gained in terms of savings to social care and health budgets and in less tangible economic and social benefits. Such benefits are deliverable not just within the National Parks and AONBs but also to major conurbations, cities, towns and settlements far beyond their boundaries.
- Communications with the wider AONB and neighbouring conurbations relies on the Board's website and social media. In 2017/18 the Board had 7,700 twitter followers, 3,600 Facebook followers, 16,800 unique YouTube video views and 173,000 visitors to its website.
- The Government could do more through the tax system to incentivise volunteering in a similar way to Gift aid.

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

- Why is there a funding variation across the Protected Landscapes family? Parks are funded 100% by Defra, AONBs 80% by Defra and 20% by local authorities.
- Whilst Parks are funded 100% by Defra they retain but don't use their precept. The retention of the precept enables the Parks to reclaim VAT. However the Conservation Boards, modelled on a Park Authority governance structure, purposes and duty, do not have a precept and therefore cannot reclaim VAT.

This anomaly should be clarified and the same rules applied to Conservation Boards if the Boards are modelled on Parks. The anomaly makes the Conservation Boards at times 20% more expensive than Parks for no good reason.

- The Conservation Boards were modelled on a Park Authority and were a governance option aimed at AONBs that were geographically large and administratively complex (the Cotswolds AONB being the largest AONB and third largest Protected Landscape after the Lakes and Dales and originally having 17 local authority partners, now reduced to 15). The Board has the same two purposes and socio economic duty but is given a much reduced funding settlement. It offers significant advantages over the more traditional local authority hosted AONB Partnership. However the question has to be asked; how can the Boards be expected to operate the same governance structure with its associated requirements, deliver the same two purposes and the same socio economic duty on circa 9% of the budget and 12.5% of the staff resource compared to the averages in National Parks.
- For a comparable area, population and broadly similar farmed landscape, the South Downs National Park Authority has 450% the income of the Cotswolds Conservation Board, excluding the Parks settlement linked to planning functions and planning fee income.
- AONBs are in part funded by local authorities and the AONB teams provide high levels of value for money. Whilst local authorities have a statutory responsibility to produce an AONB Management Plan this does not secure a sustainable funding model or obligation for the plan's implementation. Local government funding is under increasing pressure and may well not provide AONBs with the required stable long term core resource base.
- While there is some scope for private sponsorship, fundraising initiatives and development of grant-aided projects, it is easy to reach the limit of the capacity of a small organisation to secure such funding. Furthermore, the greater the proportion of funding relied upon from such sources, the less secure the long term prospects for sustainability become. While Protected Landscapes undoubtedly have significant economic pulling power, they are essentially a public good with no future sell-by date delivering very substantial if often intangible public benefits. The services that Park and AONB bodies provide are often not suited to marketisation. There thus needs to be a clearer, more robust and transparent basis for long term public funding of National Parks and AONBs based on their geography, population, area and functions fit for the 21st century, rather than historical anomalies.

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

- It is not a welcoming approach, rather a complex, time consuming and expensive process. Defra and Natural England appear to have little appetite for reviews or new designations, as evidenced by the lengthy and expensive boundary review for the Lakes and Dales National Park extensions and the slow progress with the Suffolk Coast and Heaths AONB boundary review.
- The bare bones of what is really necessary need to be clearly articulated.

- Experience suggests that there is little clear and unequivocal evidence for or against a particular designation. Debates for and against a boundary change or new designation appear to be largely based upon perception.
- The Natural England “especially desirable” criterion for designation as a National Park appears to be largely subject to individual interpretation and the conviction of Counsel’s arguments when appearing at a Public Inquiry rather than clear measurable criteria.
- The evidence base for advantages or disadvantages of being within or outside a Protected Landscape is poor overall, with many comments in favour or against a boundary or designation based on perception rather than evidence. Defra should commission national evidence.
- There may be some benefit in considering the French Regional Parks system where the boundary is set for a period of time, is regularly reviewed and local communities can opt out of the Regional Park until the next review period. It does not appear to be ideal, with holes created within a landscape designation, but does appear to be a quicker process for boundary identification and appears “owned” at the local level.
- There is much ambiguity about the setting of Parks and AONBs. There needs to be much clearer guidance, potentially mirroring the way in which similar uncertainty and inconsistency has been resolved in heritage policy and practice.

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.

- There is a clear set of evidence for the Cotswolds to be considered for designation as a National Park. The landscape clearly meets the natural beauty and recreation criteria established by Natural England. It is “especially desirable” for the Cotswolds to be designated a National Park.
- The Cotswolds Conservation Board has adopted and published the Cotswolds AONB Management Plan 2018 – 2023. It contains the clear ambition; “To promote the case for the Cotswolds being designated as England’s next National Park.”
- The boundary of any Cotswolds National Park should initially adopt the same boundary as the established Cotswolds AONB (dated 1990). The boundary should then be reviewed after 5-7 years of the day to day operation and experience of the new Park’s designation and the Park Authority governance structure.
- The current National Park and AONB designation criteria would prevent urban or built up areas being designated. There is scope for an urban designation but potentially with a different identity e.g. Landscape City.
- There could be a suite of designated landscapes from highly urban through to remote rural. Such a system would need a clear set of designation criteria.
- New urban or urban fringe designations need to have regard to previous initiatives and their lessons i.e. the New National Forest Programme and the Community Forest Programme, which sought to invest in landscape

restoration and the creation of new high quality landscapes on the doorsteps of urban populations.

- The land / sea interface arguably doesn't need separate designations. A single designation at the coast would serve to advance policy for both land and sea, (see earlier reference to Heritage Coasts).

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

- Over the last 5 years England has been less inclined to look to learn from overseas. It has increasingly looked inwards, with Europe being perceived as a negative factor within Defra.
- Lessons from the National Park Services in Canada and New Zealand in particular, where they;
 - recognise the collective value of their Protected Landscapes at a national level in terms of their value to the nation for inherent landscape and biodiversity values, as opportunities for outdoor learning, recreation and exploration and as economic worth in terms of tourism.
 - operate management structures and centres of expertise at both a national and regional level, enabling local management structures to call upon a central or regional base of expertise.
 - operate within a national and regional database of evidence and best practice.
 - share back office systems with associated gains in efficiency, effectiveness and cost rather than look to establish those systems independently at the local level.
 - offer valuable lessons for England's Protected Landscapes.
- The two Scottish National Parks and their four purposes could offer lessons to England. The English Park purposes of conservation and enjoyment are supplemented by an upgrading of the socio-economic duty to a purpose and pursuance of sustainable development as a purpose.
- The Conservation Board is a member of Europarc, the network of protected landscapes and sites across Europe which facilitates the exchange of information, experience, training, best practice and joint programmes between landscapes. The Board is also a member of Europarc Atlantic Isles (EAI) the UK and Ireland based section of Europarc. Since devolution EAI is the only organisation with a clear focus on Protected Landscapes and sites across the UK and Ireland. Its webinars, exchange programmes and training are one of the few opportunities for National Park and AONB staff to come together from across the UK.

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?

- Consideration should be given to calling all our National Parks and AONBs the same name.
- There is clear evidence that the current brand of AONB does not work.

- Our National Parks and AONBs have the same national landscape status. They are also both recognised as Category V landscapes in the international IUCN (World Conservation Union) classification system.
- The two title names date from 70 years ago and reflect the Parks having two purposes for their designation whilst the AONBs had the single purpose for designation. In 2018/19 having separate sets of purposes is not appropriate. National Parks and AONBs should share the same purposes and the same name.
- A single name or title would lead to a much improved recognition, appreciation, engagement and understanding amongst the wider public for all of our most special landscapes. It would remove confusion amongst local communities and visitors as to why there are two titles for our nationally recognised and important landscapes.
- It would remove the two tier system created by the use of two names for landscapes of equal status.
- Areas of Outstanding Natural Beauty is a designation peculiar to England Wales and Northern Ireland, whilst National Park is a title that resonates internationally, and this should be a factor in any consideration of this issue. Any new approach to terminology should have regard to the terminologies that the UK has signed up to in the Florence Convention / European Landscape Convention.

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?

- National Trails were created to explore our finest landscapes i.e Parks and AONBs. Currently the trails often operate in another separate silo, hosted by a variety of organisations. They should therefore be integrated into the Park Authorities, Conservation Boards and AONB partnerships in terms of management and funding. They should be funded via Defra as part of the National Park and AONB grant not via separate Natural England grants. A lead Park or AONB could easily be linked to and take responsibility for each trail. The combined grant, management and governance arrangements would bring a series of efficiency wins for Defra / Natural England grants and for day to day management and project delivery across National Parks, AONBs and trails.
- The various designations work fairly well together, but more by accident than design largely due to them all have conservation as their primary objective. More could be done to link these various designations together e.g. could Parks and AONBs have a greater role and responsibility for the management of NNRs, SACs and SSSIs within their area?
- The degree of engagement in SSSIs, NNRs etc is dependent upon the Defra agency approach (in particular Natural England) to the individual AONB and Park. There appears to be considerable variation as to the level of engagement or collaboration between Parks, AONBs and individual lead agencies.

- Defra agencies (Natural England, Environment Agency and Forestry Commission) in particular should be expected to pro-actively co-write the Protected Landscape Management Plan and then pro-actively help deliver the plan. They should view the Protected Landscape as one unit or landscape area, not break it into two or three “regional” areas with their own separate agency plans. The National Park or AONB organisations and the Defra group or family should have a single integrated plan for each Park or AONB, not a series of overlapping, duplicating or even conflicting plans. The plans should inform and steer investment across the Defra group. An investment decision or lottery bid by one party should not come as a surprise to another for the same landscape.
- The split of departmental responsibilities for landscape and wildlife (Defra) and heritage and culture (DCMS) can separate consideration of the ‘natural’ and ‘cultural’ value of protected landscapes. In addition the connection to health and social well-being (DHSS) is not strong. Defra’s 8 Point Plan for England’s National Parks, seeks to span Government Departments, although it does not fully consider AONBs. There is a good case for National Parks and AONBs to become a cross-departmental responsibility managed through joined-up co-ordination at the highest level.
- It is disappointing that no reference is made to geological sites, World Heritage Sites, Conservation Areas, Registered Parks and Gardens etc

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

- England’s protected landscapes are of major national and international importance. In their diversity and wide distribution they are geographically and collectively a key aspect of England’s national identity. They are the repository of a vast wealth of natural and cultural capital, and have an enormous contribution to make to the nation’s health and well-being far beyond their boundaries. This undoubted potential is only partly being delivered, to different degrees in different places, leaving much untapped potential.
- We are not currently fully remitted to do more for the social wellbeing of our residents but we would wish to contribute in particular to the reduction of social isolation.
- The ease with which people connect to Parks and AONBs must improve: a clear brand for all protected landscapes is needed.
- The untapped potential Parks and AONBs is down to several factors, not least:
 - a mismatch between the holistic vision of individual protected landscapes and the much narrower silo structures of central government and regionalised areas.
 - variation of national planning policy across Parks and AONBs.
 - under recognition of cultural and social values.
 - shortcomings and serious inconsistency in resourcing.
 - fragmentation of the Protected Landscape family.