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

Initial headline comments to inform a detailed Board response (up to 500 words per answer).

**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**

* Grant funding direct from Defra rather than via Natural England.
* Mix of local and national appointees to Conservation Boards and Park Authorities
* Independent voice of Conservation Boards and Park Authorities

**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**

* Should the purposes of designating National Parks and AONBs should be the same.
* Lack of statutory consultee status on most AONB planning issues; AONB Partnerships are not statutory consultees. Conservation Boards are statutory consultees for National Infrastructure Projects and Park Authorities are fully statutory consultees
* Distinct separate parts of the one Protected or Designated Landscapes family. Why are the Parks and AONBs in separate silos with separate Associations within the same family – particularly noticeable from a Conservation Board perspective; responsible for an AONB but modelled on a Park Authority

**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?**

* Insufficient use of AONB evidence by Defra agencies e.g use of Conservation Board’s Landscape Character Assessment and Landscape Strategy Guidelines when determining agri-environment investment.
* Yes, if they were seen as an integral part of the delivery of agri-environment / payment for public goods a services system.
* Parks and AONBs could lead delivery at the local level if they were seen as an integral part of the wider Defra family or trusted local partner – see Board’s role as Accountable Body for the Cotswolds LEADER programme (the only Protected Landscape organisation to be an Accountable Body)

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

* Variable due to governance structure and skills set
* Ability varies due to availability of funding
* Management Plans and associated evidence do not have the required impact across public sector e.g Defra agencies and local authorities

**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?**

* Variable due to governance structure and skills set
* Ability varies due to availability of funding

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

* The purpose of designating an AONB is not to provide for enjoyment or the understanding of the special qualities of the AONB. However, 70 years on from the 1949 Act (the enabling legislation) the majority of AONBs have to take account of and to varying degrees provide for recreation and enjoyment.
* The purposes of designating National Parks and AONBs should be the same.

**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?**

* Variable due to governance structure and skills set
* Ability varies due to availability of funding
* Conservation Board and Parks have a socio-economic duty; to foster the economic and social wellbeing of local communities within the Protected Landscape
* Conservation Board is the only Protected Landscape organisation that is an Accountable Body for a LEADER (socio-economic programme) Local Authorities invited the Board to lead this programme and to run it across administrative boundaries

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

* The Conservation Board is modelled on a Park Authority minus planning role. The
* Board is a statutory consultee on national infrastructure projects, so is fully engaged with Highways England over a major road scheme – this would not be the case if the AONB were a local authority hosted AONB Partnership.
* The Board is not a statutory consultee on other planning matters – as for other AONBs.

**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?**

* Local governance structures could operate within a stronger national programme.
* Could Park Authorities, Conservation Boards and AONB Partnerships be employed by a single National Parks Service. Could they share far more back office systems?
* Defra do not have a Conservation Board Policy, do they want more Board’s or less ?
* At present the type of designation automatically links to specific management or governance structure e.g a National Park = a National Park Authority; and AONB = a local authority hosted Partnership, a joint committee or an independent Conservation Board. Should we designate the landscape first and then determine the best governance structure for the landscape?

**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 operate as two separate families with two separate associations and in two separate silos – and at the same time compete with each other within and between the two silos.
* The system is not efficient, it duplicates, it doesn’t build collaboration or trust.

**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?**

* Variable due to governance structure and skills set
* Ability varies due to availability of funding
* Cotswolds has an extremely strong volunteer arm, the Cotswold Voluntary Wardens, originally established in 1968 – who were awarded the Queen’s Award for Voluntary Service in 2018
* Overall Parks and AONBs are poor at fully engaging with their neighbouring large towns and cities

**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 that retain but don’t sues their precept, meaning that they are then able to reclaim Vat. This anomaly should be clarified and the same rules applied to Conservation Boards if the Boards are modelled on Parks.
* Why are the Conservation Board’s modelled on a Park authority with the same two purposes and socio economic duty but given a much reduced funding settlement?

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

* It is a complex and expensive process with little appetite for reviews or new designations from Defra or Natural England – witness the lengthy boundary review for the Lakes and Dales National Park extensions and the slow progress with the Suffolk Coast and Heaths AONB boundary review.
* Compare that to the French Regional Parks system where the boundary is set for a period of time, is regularly reviewed and local communities can opt out.
* The evidence base for 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 that evidence. Defra should commission national evidence.

**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.**

* The Cotswolds should be designated England’s next National Park – see separate submission.
* The boundary of any Cotswolds National Park should initially adopt the same boundary as the established AONB, with the boundary reviewed after 5-7 years of the Park’s operation.

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

* In recent years England has been less inclined to look to learn from overseas – it has increasingly looked inwards. Europe has been a negative word within Defra.
* ational Park Services in Canada and New Zealand in particular recognise the collective value of their Protected Landscapes at a national level and operate management structures and centres of expertise at a national level. They offer valuable lessons.

**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?**

* Why aren’t all our Protected Landscapes given the same name? That would lead to a much improved recognition, appreciation, engagement and understanding amongst the wider public.

**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. They should therefore be integrated into Parks and AONBs in terms of management and funding. They should be funded via Defra not Natural England. Currently they often operate in another separate silo. A lead Park or AONB could be linked to each trail.
* 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.
* Defra agencies 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.

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

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