

Report to **South Downs National Park Authority**  
Date **24 March 2022**  
By **Chief Executive**  
Title of Report **SDNPA Response to the Landscape Review Consultation**  
**Decision**

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**Recommendation: The Authority is recommended to**

- 1. Approve the Authority's Response to the Government's Landscape Review consultation and covering letter as set out at Appendix 1**
  - 2. Delegate authority to the Chief Executive, in consultation with the Chair of the Authority, to make any amendments required by the NPA to the draft response and covering letter and to submit the final consultation response and covering letter to Defra.**
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**I. Introduction**

I.1 In May 2018, the Government announced a review would be undertaken into the role of National Parks and AONBs in England, The scope of the review included:

- the existing statutory purposes for National Parks and AONBs and how effectively they are being met
- the alignment of these purposes with the goals set out in the 25-Year Plan for the Environment
- the case for extension or creation of new designated areas
- how to improve individual and collective governance of National Parks and AONBs, and how that governance interacts with other national assets
- the financing of National Parks and AONBs
- how to enhance the environment and biodiversity in existing designations
- how to build on the existing eight-point plan for National Parks and to connect more people with the natural environment from all sections of society and improve health and wellbeing
- how well National Parks and AONBs support communities

I.2 A call for evidence was launched in October 2018, which sought to collect the views of individuals that live, work or visit National Parks and/or AONB and organisations with an interest in National Parks and/or AONBs.

- 1.3 The findings of the landscape review were published in September 2019. These findings were set out under the following headings:
- Landscapes Alive for Nature and Beauty
  - Landscapes for everyone
  - Living in landscapes
  - More special places
  - New ways of working
- 1.4 The landscape review made a total of 27 proposals across these headings
- 1.5 Subsequently the Government's response to the Landscape review was published as a consultation document in January 2022. This is included at **Appendix 2**.
- 1.6 SDNPA members had the opportunity to consider the issues raised in the consultation document at a workshop in late Jan 2022, and the SDNPA has actively worked with partners across the National Park to encourage responses to the consultation.
- 1.7 Many of the issues raised in the landscape review are not included in the Consultation response, and therefore it is proposed to include a covering letter with the Authority's response, which covers some issues not included in the consultation. This is included in **Appendix 1**.

## 2. Policy Context

The landscape review is a nationally important piece of work and will contribute greatly to the shaping of the future of National Parks and AONBs in England and responding to the consultation has been considered a priority for the SDNPA.

## 3. Issues for consideration

- 3.1 The proposed response to the consultation questions is set out at appendix 1. Members' attention is drawn, in particular to the following:
- The response is based on feedback provided by Members at a workshop in January 2022. The draft response was also circulated to Members in advance of this meeting and additional feedback sought.
  - A task and finish group of members, chaired by the chair of the Authority was established to consider question 21 (Local Governance). This group met twice to prepare its draft response, which has been included in the overall response set out at **Appendix 1**.
  - A covering letter will be included with the response setting out the SDNPA position on a wider range of topics and covering issues not explicitly included in the consultation.
  - Where appropriate the rationale for the SDNPA response is set out under the relevant question in **Appendix 1**.

## 4. Options & cost implications

- 4.1 The costs for this work have been met from within existing budgets.
- 4.2 Due to the importance of this consultation in shaping the future of England's National Parks and AONBs not responding the call for evidence was not considered as an option.

## 5. Next steps

- 5.1 Following agreement of the response by the SDNPA the Chief Executive will submit the response to Defra for consideration.
- 5.2 Any response or further updates from the consultation exercise will be shared with members' if/when it becomes available.

## 6. Other implications

Implication	Yes*/No
Will further decisions be required by another committee/full authority?	No
Does the proposal raise any Resource implications?	There are no resource implications arising from this paper.
How does the proposal represent Value for Money?	The landscape review will impact upon the future of the SDNPA therefore ensuring the authority is able to influence this as much as possible is considered good value for money
Are there any Social Value implications arising from the proposal?	No
Have you taken regard of the South Downs National Park Authority's equality duty as contained within the Equality Act 2010?	Equalities issues have been considered in relation to access, inclusion and engagement and have been reflected where appropriate in et Authority's response The equalities implications of any actions arising from the landscape review will be considered at the appropriate time by the SDNPA.
Are there any Human Rights implications arising from the proposal?	None
Are there any Crime & Disorder implications arising from the proposal?	None
Are there any Health & Safety implications arising from the proposal?	None
Are there any Data Protection implications?	None
Are there any Sustainability implications based on the 5 principles set out in the SDNPA Sustainability Strategy?	The Landscape review has the potential to impact on all 5 principles within the SDNPA sustainability strategy

## 7. Risks Associated with the Proposed Decision

- 7.1 Failure to submit a response to the landscape review would mean that the view of the SDNPA would not be taken into account when the review considered its recommendations.

**TREVOR BEATTIE**  
**Chief Executive Officer**  
**South Downs National Park Authority**

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Appendices	<ol style="list-style-type: none"><li>1. Consultation response</li><li>2. Landscape review consultation document</li></ol>
SDNPA Consultees	Chief Executive; Director of Countryside Policy and Management; Director of Planning; Chief Finance Officer; Monitoring Officer; Legal Services, Business Service Manager.
External Consultees	None
Background Documents	None

**Draft covering letter for Ian Phillips to send to Lord Benyon**

**South Downs National Park response to Defra Consultation on the Glover Review**

I attach a print out of the South Downs National Park Authority's response to Defra's consultation on the Glover Review. This has been developed by our Members in a workshop and approved by our NPA. You will see that SDNPA broadly welcomes the ambitions in your Department's response, particularly around nature recovery and access for all.

We fully support the case for legislation to strengthen S62 and extend the power of competence and hope this can be done at the earliest opportunity. These modest legislative changes would accelerate delivery of the ambitions for Protected Landscapes (PLs) set out in the consultation at no net cost to the public sector.

SDNPA welcome the promised greater role for NPAs in ELMS. FiPL has already shown that we can efficiently deliver cost effective, outcome focused and farmer led support on the ground. We would like Defra to work with us to build on this success as you shape the Nature Recovery element of the new system of agricultural support.

SDNPA endorse the commitment to "explore ways for PLs to support responsible authorities in preparing and delivering LNRs" but this is too vague and does not seem to align with Defra guidance on the Strategies. Glover said that PLs should be "the backbone of Nature Recovery Networks" and we would urge Defra to promote this recommendation. Urgent guidance from Defra is required to explain exactly how PLs can take a leading role in the development of LNRs.

Whilst therefore there is much to welcome, SDNPA has serious concerns over the growing gap between increased expectations and the reducing ability of NPAs to deliver following [an anticipated three] years of flat cash settlements from Defra. [The expected settlement will require us to make significant cuts in our staff team in order to ensure that we retain the ability to deliver projects], yet the Department's response demands significantly more from this reducing complement. The Glover review said at the outset that "we recognise that any increase in ambition will need to be matched with funds" (p22). It is therefore essential to secure grant funding at least in real terms over the CSR period to allow NPAs to meet our shared aspirations.

Given the importance the Government attaches to nature recovery and climate change it is disappointing that the response contains no specific proposals to help National Park Authorities take a lead on these issues. This is a huge missed opportunity. SDNPA's rapid progress in this area merits active support from Defra. Our #ReNature campaign, which was launched in November alongside COP26, has already raised £350k and the associated call for sites has generated 70 EOs. In addition we have undertaken work to develop our Climate Change Action Plan, mainstreaming the ideas of 'Net Zero with Nature' and tackling the twin challenges of Nature Recovery and Climate Action. We have worked with the wider National Parks family to establish the NPAs in a leadership role, and to set ambitious targets of 'Net-Zero' for the National Park Authority by 2030; and the National Park as a whole by 2040. We are working with our local communities to help them become more resilient; supporting the development of community-based energy projects and to drive a rapid transition to a low-carbon future. This work is, however, heavily dependent on staff time, so real terms grant reductions threaten our progress.

We welcome the proposed new Partnership as a stronger voice for PLs on the national stage and an additional source of best practice, training and income generation. SDNPA is, however, already successful at raising external finance, with £1.4m raised from grant, private and philanthropic sources in 2021/22, plus a further £2.5m in CIL. This is chiefly allocated to specific project deliverables since our experience is that it is extremely difficult to persuade third party donors to cover the operating

costs of public bodies. We do not have significant land holdings so we are not in a position to generate much additional income through environmental credits, although we are working with partners across the National Park to maximise the benefit for our landowners.

External finance can never be the answer to the revenue funding crisis since it is labour intensive to attract and deliver whilst rarely supporting running costs. It extends the scope of NPA operations whilst placing ever greater pressure on our diminishing staff team. The frequent references in the Defra response to the scope for attracting private finance fail to recognise this point. Increased private finance is a function of increased government grant, not a substitute for it.

We acknowledge that improvements can be made to the way NPAs operate and believe that it is a priority to increase the diversity of our NPAs, staff and programmes. There cannot, however, be a one size fits all response to the governance issues raised in the review and consultation document. Local circumstances must be taken into account when considering changes that will impact upon the operation and governance of individual Authorities. The SDNPA's geographic extents and representation enable productive relationships with a wide range of other public bodies and partner organisations.

SDNPA already work closely with the AONB family through South East and East Protected Landscapes, (SEEPL), which was quoted as good practice in the original Glover Review (p64). We would like to build on this model to further assist our neighbouring AONBs, making NPAs the central point for regional Nature Recovery Networks of PLs, but this would require the active support of your Department.

SDNPA would be happy to expand further on any of the points in this letter or the attached response. We would welcome further dialogue with you and other Ministers and would be very pleased to host a visit at any time to show you the progress we are making on the ground with our communities and partners.

**Ian Phillips**

**Chair**

**SDNPA landscape review consultation response**

**Questions**

1. Do you want your responses to be confidential? If yes, please give your reason.

Yes

No ✓

2. What is your name?

Trevor Beattie

3. What is your email address?

Trevor.Beattie @southdowns.gov.uk

4. Where are you located?

North East/North West/Yorkshire and The Humber/East Midlands/West Midlands/East of England/London/South East/South West/Remote

5. Which of the following do you identify yourself as?

National Park Authority or the Broads Authority/AONB team/Local authority/Other public body/Environmental NGO/Other NGO/Professional body/Academic/Business/Resident of a protected landscape/Member of the general public/Other

**A stronger mission for nature recovery**

6. Should a strengthened first purpose of protected landscapes follow the proposals set out in Chapter 2?

Yes ✓

No

Unsure

Please give reasons for your answer

The SDNPA proposes the following wording for a strengthened purpose 1

“Conserve, actively restore and enhance the landscape, its natural beauty, biodiversity, Natural Capital and cultural heritage, and in so doing contribute to tackling climate change and adapting to its impacts”

Also essential to retain the Sandford principle.

7. Which other priorities should be reflected in a strengthened first purpose e.g. climate, cultural heritage?

Enhancing the landscape and its natural beauty

Biodiversity

Natural Capital

Cultural heritage

### Agricultural transition

8. Do you support any of the following options as we develop the role of protected landscapes in the new environmental land management schemes? Tick all that apply.
- Designing the environmental land management schemes in a way that works for all farmers and land managers, including the specific circumstances for those in protected landscapes, recognising that farmers in these areas are well-placed to deliver on our environmental priorities.
  - Using Local Nature Recovery Strategies to identify projects or habitats within protected landscapes.
  - Monitoring the effectiveness and uptake of the new environmental land management schemes in protected landscapes. Using this to inform whether further interventions are needed to ensure we are on track for wider nature recovery ambitions. ✓
  - Creating a clear role for protected landscape organisations in the preparation of Local Nature Recovery Strategies. Our recent LNRS consultation specifically asks for views on the role of different organisations in the preparation of LNRSs, including protected landscapes. ✓



- Building on FiPL, empowering protected landscapes to support decision-making and delivery against agreed priorities, including through dedicated project coordinators and advisers. ✓

9. Do you have any views or supporting evidence you would like to input as we develop the role of protected landscapes in the new environmental land management schemes?

The final point above is the key one for NPs. The existing proven NPA role in delivering FiPL needs to be extended to give NPAs a permanent role in the design, delivery and outcome monitoring for the new middle tier of ELMs – the nature recovery scheme. This is because the scheme is so crucial to the purposes of NPAs that it is vital that NPAs have these tools in their toolboxes

FiPL has provided a host of evidence about the ability of NPAs to deliver rapidly on the ground through farmer led projects. In parallel, we are seeking a strong role for NPAs in developing LNRS, to ensure that these embed the approach to nature recovery already underway in the National Park and the spatial priorities underpinning it

### **A stronger mission for connecting people and places**

10. Should AONBs have a second purpose relating to connecting people and places, equivalent to that of National Parks?

YES ✓

NO

UNSURE

Please give reasons for your answer

11. Should a strengthened second purpose of protected landscapes follow the proposals set out in Chapter 3 to improve connections to all parts of society with our protected landscapes?

YES ✓

NO

UNSURE

Please give reasons for your answer

Proposed new wording:

“Enable all of society to be involved with and champion the special qualities of these places through enjoyment, access and education, whilst promoting opportunities for the nation’s health and wellbeing”.

12. Are there any other priorities that should be reflected in a strengthened second purpose?

Yes – need to add health/wellbeing and the active championing of Protected Landscapes. Also vital to retain the link to special qualities, particularly in relation to the planning functions of NPAs and the S62 obligations of other bodies.

### Managing visitor pressures

13. Do you support any of the following options to grant National Park Authorities and the Broads Authority greater enforcement powers to manage visitor pressures? Tick all that apply.

- Issue Fixed Penalty Notices for byelaw infringements ✓
- Make Public Space Protection Orders (PSPOs)
- Issue Traffic Regulation Orders (TROs) to control the amount and type of traffic on roads

Please give reasons for your answer:

It is already the responsibility of the Highway Authority to make TRO’s on roads and we do not want unnecessary duplication of powers. An extension of these powers to include highways could create confusion and raise expectations that the NPA does not have the resources to deliver upon.

The ability to issue fixed penalty notices would be useful only where the NPA itself has made the byelaw. In relation to TRO’s and PSPO’s these powers are already held by the Tier 1 LAs operating within the National Park and we do not see any added value in duplication. As above, it is more important to strengthen s62 so that those LA’s do use the powers they have to control activities that are inappropriate in the NP

14. Should we give National Park Authorities and the Broads Authority and local highway authorities additional powers to restrict recreational motor vehicle use on unsealed routes?

YES

NO ✓

UNSURE

Please give reasons for your answer:

It is noted that the NPA's and LA's already have powers in relation to "Green lanes"/BOATs on grounds of environmental protection, prevention of damage, nuisance and amenity. Strengthening the s62 duty should have the same effect for NPAs as working through the existing LHAs as these bodies already have the resource and the skills to provide an enhanced approach within the National Park.

15. For which reasons should National Park Authorities, the Broads Authority and local authorities exercise this power?

- Environmental protection
- Prevention of damage
- Nuisance
- Amenity
- Other [PLEASE STATE]

Improving access for all users

16. Should we legislate to restrict the use of motor vehicles on unsealed unclassified roads for recreational use, subject to appropriate exemptions?

Yes – everywhere ✓

Yes – in National Parks and Areas of Outstanding Natural Beauty only/

Yes – in National Parks only/

No

Unsure

Please give reasons for your answer

Resources would need to be available to LHAs (and/or NPAs) before such a change could be made. These enhanced powers should be available everywhere since problems with unsealed routes are universal.

17. What exemptions do you think would be required to protect the rights and enjoyment of other users e.g., residents, businesses etc?

Those who need access for business purposes, such as vehicles of farmers and other landowners, the emergency services, and those for whom access is difficult such as blue badge holders, mobility scooters etc.

### The role of AONB teams in planning

18. What roles should AONBs teams play in the plan-making process to achieve better outcomes?

Statutory consultees.

19. Should AONB teams be made statutory consultees for development management?

YES✓

NO

UNSURE

Please give reasons for your answer

20. If yes, what type of planning applications should AONB teams be consulted on?

- AONB teams should formally agree with local planning authorities which planning applications should be consulted on. ✓
- AONB teams should be consulted on all planning applications that require an Environmental Impact Assessment and are categorised as 'major development' as well as Nationally Significant Infrastructure Projects. . ✓
- Other [Please state]

There should be a clear distinction between the role of NPAs as planning authorities and that of AONBs as statutory consultees. NPAs should have the ability to support AONBs in this role as long as they are given the resources to do so.

### Local governance

21. Which of the following measures would you support to improve local governance?

Tick all that apply.

- Improved training and materials ✓
- Streamlined process for removing underperforming members ✓
- Greater use of advisory panels ✓
- Greater flexibility over the proportion of national, parish and local appointments ✓
- Merit-based criteria for local authority appointments ✓
- Reduced board size ✓
- Secretary of State appointed chair
- Other [Please state]

Time limits placed on the terms of office of LA and Parish appointed Members,

Please give reasons for your answer

- The SDNPA will always welcome high quality training and training materials. Training must be relevant and add value to our work and to the high quality training and development already provided to Members by the SDNPA. The Authority would welcome additional training from Defra and the wider government family to support it in delivering its outcomes.
- The SDNPA undertakes annual reviews and discussions with all Members and takes opportunities to enable Members to apply their skills, experience and capacity to engage effectively in the work of the Authority. Should a Member's significant under-performance be identified, the Authority would support a streamlined process for removal.
- The SDNPA already has an extensive network of advisory panels, including an independent partnership with an Independent Chair, that are used to support the work

of the Authority including the development and delivery of its Management Plan, and is happy to share what it has learnt from working in this way with Defra and others.

- The SDNPA would welcome the ability to exercise greater flexibility over its membership and would welcome initiatives to increase the diversity of boards. The SDNPA also supports having greater flexibility over the proportionality rules as they apply to its committees to ensure we deploy the talents of our Members in the best possible way
- The SDNPA recognises that Local Authority Members in particular face conflicting demands on their time and priorities and that these, together with significant travelling distances, can affect their ability or capacity to participate fully in the NPA's activities. Whilst political considerations will inevitably play a role in LA appointments, the NPA would welcome greater awareness and consideration of relevant interests, commitment and capacity in making appointments, supplemented by opportunities for consultation prior to appointment.
- The SDNPA accepts the principle that a smaller board could result in efficiencies and streamlining of governance processes, however, the Authority has seen benefits from having a large board in terms of the range of views and experiences represented on the Board from across the diverse and widespread range of landscapes and communities that comprise the South Downs National Park. Given the significant workload and time commitment of its Planning Committee, the Authority is also concerned regarding the potential additional burden on fewer members serving on multiple committees and their capacity to do so.
- The SDNPA has concerns that a SoS appointed chair could become politicised and safeguards would need to be put in place to ensure the best possible candidate was appointed. The SDNPA feels that locally accountable bodies benefit from locally accountable and appointed leadership and supports the position that Chairs should continue to be elected annually by their peers, however the SDNPA also considers that there should be a time limit on the role of Chair.
- The SDNPA would like to see time limits placed on the terms of office of LA and Parish appointed Members, to ensure a regular turnover of membership and opportunities for new ideas and thinking to be brought on to the Authority. The Authority would favour 2 four-year terms for such members.

**A clearer role for public bodies**

22. Should statutory duties be strengthened so that they are given greater weight when exercising public functions?

YES ✓

NO

UNSURE

Please give reasons for your answer:

The duty needs considerable strengthening i.e. “have special regard” and “furthering the purposes”. The proposed National Landscape Partnership should produce a regularly updated list of relevant bodies and report on their performance against the new duty.

23. Should statutory duties be made clearer with regards to the role of public bodies in preparing and implementing management plans?

YES ✓

NO

UNSURE

Please give reasons for your answer:

Link should be to the active delivery of Management Plans, not just to the purposes.

**General power of competence**

24. Should National Parks Authorities and the Broads Authority have a general power of competence?

YES ✓

NO

UNSURE

Please give reason for your answer:

This is essential to achieve the income generation aspirations expressed elsewhere in the consultation. We have already sent Defra a paper giving detailed examples of how a general power of competence would have an immediate positive impact on income generation and can re-submit this if required.

## Overall

25. If you have any further comments on any of the proposals in this document, please include them here.
- The original Glover report contained a powerful narrative about the opportunity, need and urgency for more action to make PLs places, which benefit all parts of society. This included references to formal education, night under the stars, diversity, access and signage, new skills for rangers and increase in ranger numbers. Further the original Glover' review made welcome comments about public transport (to bring about new and more sustainable ways for all parts of society to access protected landscapes) which are not referenced in this response. It is disappointing to see that, overall, there are very few tangible measures suggested in the response, and those, which are mentioned, are vague.
  - This sits in contrast to the very detailed proposals about TROs, Green Lanes, PSPOs etc. Whilst it is accepted that these are included because they would require primary legislation, the risk is that the very positive and inclusive vision on Glover is perceived to have been reduced to measures to control visitors rather to encourage and widen participation.
  - Funding is essential to address the increasing gap between rising expectations and falling public funding. We support the Glover Review's statement that "any increase in ambition will need to be matched with funds" (p22).
  - Given the centrality of Net Zero to the Government's strategy, it is very disappointing to see no tangible mechanisms or levers made available to Protected Landscapes. As with Nature recovery, if PLs are to be at the vanguard of Climate Change mitigation and adaptation as the vision implies, they will need the tools to move further and faster with their communities, businesses, landowners and through their role (for NPAs) as planning authorities
  - The Authority is concerned at a lack of references to culture and heritage. Not only does the SDNP contain exceptional built heritage - reflecting its settlement from the neolithic period to the present day - it also has a thriving cultural network of museums, artists and creators. We know from experience that this cultural richness has been instrumental in drawing new audiences to the NP and played a powerful means to improve health & wellbeing. Similarly, the lack of proposals in relation to protected landscapes becoming leaders in sustainable tourism is cause for concern. Sustainable tourism is another opportunity for NPAs / AONBs to bring so many important issues



together in a 'place-based' way (as exemplars or others to learn from) that could have significant benefits locally, nationally and internationally.

- The Government response does not contain enough practical suggestions for increasing diversity of users of PLs (as opposed to diversity on their Boards). There are any good examples of how to do this across the PL family and this is a missed opportunity to provide support and tools to deliver against this important agenda.
- It is essential that the actions and outcomes arising from the landscape review is integrated with the nature white paper and other emerging statutory and non - statutory changes and promote and encourage cross governmental working to support delivery in PL's including fully exploiting PLs roles in relation to the National health and wellbeing agenda .
- The role of NPA's as planning authorities should not be overlooked and is central to the delivery of national park purposes. Planning is key tool for managing change within the landscape, and can also generate income (through CiL, for example) to contribute to wider delivery of our outcomes





Department  
for Environment  
Food & Rural Affairs

# Government Response to the Landscapes Review

Date: January 2022

We are the Department for Environment, Food and Rural Affairs. We're responsible for improving and protecting the environment, growing the green economy, sustaining thriving rural communities and supporting our world-class food, farming and fishing industries.

We work closely with our 33 agencies and arm's length bodies on our ambition to make our air purer, our water cleaner, our land greener and our food more sustainable. Our mission is to restore and enhance the environment for the next generation, and to leave the environment in a better state than we found it.



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## Foreword

The last two years have demonstrated the benefit that people get from having access to nature-rich landscapes. Our National Parks and Areas of Outstanding Natural Beauty have been a vital resource for so many of us, but it remains the case that they can be hard to reach. As we embark on our mission to level-up every part of the country, I want us to ask what more we can do to bring nature and people closer together.

I am enormously grateful to Julian Glover and the panel for their report, which comprehensively reviewed our National Parks and AONBs. We have an opportunity to create a new chapter for our protected landscapes, and this response will set out how we plan to do so. The work that we are taking forward is going to contribute to our commitment to protect 30% of our land by 2030 and boost biodiversity, as well as designating more areas of the country for their natural beauty.

Our protected landscapes must also be integrated into the design and development of Local Nature Recovery Strategies and our Environmental Land Management schemes. We have already launched our Farming in Protected Landscapes programme to help farmers based in National Parks or AONBs to make improvements to the natural environment and improve public access on their land.

Alongside boosting biodiversity, improving public access to our protected landscapes is a priority. Our levelling up agenda is about addressing inequality, and I am determined that our protected landscapes will be accessible to all, improve mental and physical wellbeing and support local economies. We will encourage sustainable tourism and national engagement programmes, supported by expanded ranger services and improved rural transport. Equally, where people don't respect our protected landscapes, we will ensure strengthened enforcement powers address antisocial behaviour and damage.

Our protected landscapes must be managed more consistently, but never at the expense of local input. What works for Dartmoor won't necessarily work for the Lake District – but they do share national challenges like climate change. That is why we will establish a new national landscapes partnership to coordinate the work of existing organisations at a national level but maintaining current levels of local input.

Working with National Parks and AONBs in the coming years, we will ensure our protected landscapes boost biodiversity; recognise their role in delivering Net Zero, protect us from flooding; store carbon; help communities adapt to the effects of climate change; improve the quality of people's lives and support rural economies.

Julian Glover's review highlighted a series of challenges facing our National Parks and AONBs but recognised that there are solutions and – most importantly – opportunities.

The package of measures set out in this response will rise to the challenge before us and leave our protected landscapes in a better condition for future generations.



A handwritten signature in blue ink that reads "Richard Benyon." The signature is written in a cursive style.

**The Rt Hon Lord Benyon**

Parliamentary Under Secretary of State at the Department for Environment, Food and Rural Affairs

## Introduction

All of England's landscapes are important, but National Parks and Areas of Outstanding Natural Beauty (AONBs) are our most iconic and beautiful places. Based on their geology and history, these characteristic landscapes contain swathes of ancient woodland, deep peat and grassland, and many of our most threatened species such as the red squirrel, curlew and water vole. Protected landscapes represent our shared heritage and national identity, and are home to many of our rural communities and businesses. They also support our nation's health and wellbeing as unique places to experience natural beauty and tranquillity.

Since our statutory system of protected landscapes was first established by Parliament in 1949, our society and the challenges it faces has changed. We must address climate change, biodiversity loss and increasing public health issues such as mental health and obesity. At the same time, our understanding of the value of the natural environment has vastly improved, particularly the public services it provides. That is why the government commissioned the Landscapes Review.

Reflecting on all these changes and the comprehensive findings of the review, we feel this is a moment to redefine the role that protected landscapes should play in today's society. Our vision for protected landscapes is:

*'A coherent national network of beautiful, nature-rich spaces that all parts of society can easily access and enjoy. Protected landscapes will support thriving local communities and economies, improve our public health and wellbeing, drive forward nature recovery, and build our resilience to climate change.'*

The review represents an exciting new chapter in the history of our nation's most special places. The document sets out the government's response to the findings of the review and our proposed approach to achieving this vision for protected landscapes. It will involve changes to the way that we work together to manage and protect these places to ensure future generations inherit our protected landscapes in a better state than we found them.

### The review

Julian Glover and the panel carried out a comprehensive review of our protected landscapes and made 27 wide-ranging proposals; this document sets out the government response to those proposals. We reference proposal numbers from the [review](#) where relevant.

Implementing our response to some proposals will involve changes to primary legislation. We are consulting on those changes and include details of how to respond. Annex A – Consultation There is also an opportunity for people to comment on all other aspects of the



response. We are keen to hear from a broad range of society who are interested in the future of our protected landscapes.

## Terminology

**‘Protected landscapes’:** For the purposes of this document, the areas designated as National Parks, the Broads, and Areas of Outstanding Natural Beauty (AONBs) will be referred to collectively as ‘protected landscapes’. In this document, references to ‘National Parks’ include the Broads.

**‘Lead partners’:** Responsibility for day-to-day management of these areas is led by different lead partners and organisations including National Park Authorities, the Broads Authority, and AONB teams. For the purposes of this document, these are referred to collectively as our ‘lead partners’.

**‘AONB teams’:** For the purposes of this document, AONB Conservation Boards and AONB Partnerships hosted by local authorities will be referred to collectively as AONB teams.

## Since publication of the review

A huge increase in visitors during the Coronavirus pandemic demonstrated the vital role protected landscapes have in supporting the nation’s health and wellbeing. However, this experience also presented significant visitor management challenges, at times putting a huge strain on our lead partners and communities. This demonstrated that we do not currently have sufficient resources in place to fully meet public demand for our protected landscapes, particularly if we are to attract new and larger audiences.

## Nature and climate

The Prime Minister has committed to [protect 30% of UK land for nature by 2030](#) (30 by 30), setting out our intention and ambition to deliver domestically on the 30 by 30 global goal we are advocating for under the Convention on Biological Diversity’s (CBD) post-2020 Global Biodiversity Framework. Despite being only one quarter of land cover, protected landscapes are home to nearly half of all priority habitats in England, including many of our most important sites for nature. Achieving 30 by 30 will rely on improvements in how these areas are protected and managed for nature recovery, as set out in this response to the review and the Nature Recovery Green Paper.

Natural England has set out an ambitious new [landscape designation programme](#), helping us to implement Proposals 20-22. This includes considering the creation of two new AONBs in the Yorkshire Wolds and Cheshire Sandstone Ridge, and extensions to the

Surrey Hills and Chilterns AONBs. The new programme, which includes undertaking an All-England Assessment, is exploring new approaches to improve landscapes for people and nature, particularly in and around towns and cities. It will enable a more collaborative process to designate new National Parks and AONBs.

We have launched the [Farming in Protected Landscapes](#) (FiPL) programme to help our lead partners forge new or stronger relationships with farmers to deliver projects that support nature recovery, mitigate climate change, improve access, and support sustainable farm businesses. The programme is part of Defra's [Agricultural Transition Plan](#) and should help shape the potential role that protected landscapes could have in the agricultural transition.

We have published our Net Zero Strategy which sets our ambition to use our land more effectively to tackle climate change, in which protected landscapes have a key role. The [England Trees Action Plan](#) launched in May 2021 committed to treble tree planting rates in England by the end of this Parliament. This objective is supported by the Nature for Climate Fund worth more than £750 million across this parliament. As part of this, we are working with landowners, local authorities, and local communities to fund multiple large afforestation projects contributing to the aim of Proposal 20 that local people should be supported to create more wooded, accessible landscapes. This includes at least three new community forests located in areas of social and tree canopy deprivation and funding for planting in the North and Midlands through the Northern Forest and National Forest Company. The complementary England Peat Action Plan set out our government's long-term vision for the management, protection and restoration of our peatlands and committed to immediately fund at least 35,000 ha of peatland restoration by 2025. This includes a £2.7 million investment through the Nature for Climate Peatland Grant Scheme into the Great North Bog, a landscape approach to restoration across nearly 7,000km<sup>2</sup> of upland peat in the protected landscapes of northern England.

The 2021 Spending Review also announced a new government target to leverage at least £500 million a year for nature's recovery by 2027 and more than £1 billion a year by 2030. Designated landscapes have a major role to play in achieving, and benefitting from, this target.

Our lead partners have collectively pledged to address climate change and biodiversity loss at a national level. National Parks England (NPE) has set clear targets for climate mitigation and nature recovery through their [delivery plans](#). Led by the National Association for AONBs, AONB teams are working to deliver the [Colchester Declaration](#), which includes targets for habitat restoration and species recovery.

## People and places

The review highlighted the disparities in society's access to nature, and its importance to wellbeing and reducing health inequalities, which was made much more apparent during the pandemic. The government is proud to support more diverse and inclusive engagement, such as the [Generation Green programme](#), through our [Green Recovery Challenge Fund](#). The government has also launched [green social prescribing pilots](#) at several sites in or near protected landscapes, which will test how connecting people with nature can improve mental wellbeing and contribute to our implementation of Proposal 10.

NPE has recently published their 'Landscapes for Everyone' [delivery plan](#), which outlines their commitment to enabling underrepresented communities to discover protected landscapes. We have already seen innovative projects at several National Parks including South Downs' bespoke [Health and Wellbeing strategy](#), Exmoor's Families United in Nature Project, and North York Moors' lottery-funded [Explorer Club](#).

Across the country, AONB teams are working to support constructive, creative engagement between the public and the landscapes, through for instance North Pennines AONB and Yorkshire Dale lottery-funded partnership on the [Tees-Swale: naturally connected programme](#), Kent Downs AONB's work on informing [enhanced access](#) and the Chilterns Conservation Board's [Chalk, Cherries and Chairs](#) initiative. Additionally, as part of their commitment to reach a more diverse range of people, the UK's AONBs have worked with the Ginkgo Prize, the world's largest eco-poetry prize, to establish a [Best Poem of Landscape](#) category.

## Chapter 1: A more coherent national network

The review highlighted the opportunity to bring protected landscapes together to achieve ‘more than the sum of their parts’ by unifying the current system, providing more consistent national leadership, and setting a clear mission. These fundamental changes will underpin our ability to achieve our national vision for ‘a coherent national network of beautiful, nature-rich spaces that all parts of society can easily access and enjoy’.

### Strengthened AONBs

The review recognised the vast majority of AONBs are indistinguishable from National Parks and are just as important for people and nature but lack equivalent recognition in law or support in resources. Proposal 24 therefore called for “AONBs strengthened with new purposes, powers and resources, renamed as National Landscapes”. The package of reformed purposes and resources set out in this response are relevant to all protected landscapes and lead partners. However, we agree that action needs to be a priority in AONBs in order to unlock their full potential in achieving our vision alongside our National Parks.

We agree that the national significance of our AONBs should be reflected in their name. We are currently working with the National Association for AONBs to identify the best way to exemplify the values which underpin this renewed family of protected landscapes in their branding. As part of that work, we are testing the proposal to rename AONBs as ‘National Landscapes’. Any name change must represent a step change for AONB teams with the ambitious new title encompassing new purposes delivered by skilled teams, sustainable funding and robust governance. Pulled together as a package these proposals have the potential to deliver a transformational approach to AONB leadership and management.

### Strategic direction

We agree with the finding of the review that we need stronger governance to provide national leadership and coordination, and to ensure that our lead partners in National Parks and AONBs collaborate much more effectively to achieve our vision. While Proposal 25 suggested creating a new ‘National Landscapes Service’, we do not believe that this should be a new public body, as this will simply create another organisation within an already complex governance system, at the cost of great public expense and disruption to the important work of our lead partners. Having carefully considered this proposal, we believe that national governance reforms should be focussed on ensuring that our existing partners work together more effectively at a national level.

We will therefore establish a new national landscapes partnership to build on the existing collaboration between National Parks England and the National Association for AONBs, complemented by roles for the National Trails and National Parks Partnerships. This partnership should:

- generate additional private income through green finance initiatives and joint funding bids;
- champion protected landscapes and run national campaigns, such as promoting tourism;
- develop strategic partnerships and programmes with a particular focus on commercial partners;
- create opportunities to provide training and development, and
- share knowledge and expertise to build capacity across the protected landscapes family.

We are working with partners to develop the structure of this new partnership over the coming months.

Defra will provide clearer strategic direction for protected landscapes through a new national landscape strategy. This will set out a clear national framework to guide the development of plans and programmes by the national landscapes partnership and help to inform the development of local management plans. This is explained further in Chapters 2 and 4.

Natural England's role as our statutory advisor on England's landscapes will be reinvigorated to support national landscapes to better recover nature and provide good quality access to it. It will advise all relevant parts of government, at the local and national levels, on the appropriate management and protection of protected landscapes. It will also have a clear role in monitoring progress of delivering the national landscapes strategy through local management plans and delivery. This is explained in Chapters 2 and 4.

## A unified mission

The review highlighted the fundamental importance of the statutory purposes of protected landscapes in shaping the decisions that follow, including government policy, funding, and decision-making. Chapters 2 and 3 set out the specific changes to the statutory purposes that we intend to make to ensure they are aligned with our vision for protected landscapes. Given that National Parks and AONBs are equally important parts of our vision, we will also ensure that their statutory purposes are more closely aligned. This will bring greater consistency in how these areas are protected and managed.

We will obviously need to consider the effects of any changes to statutory purposes separately for the Broads, which has a third statutory purpose in relation to navigation.

## Chapter 2: Nature and climate

Protected landscapes have enormous potential to deliver on our environmental ambitions, including the 25 Year Environment Plan goals, Environment Act 2021 forthcoming targets, and reaching net zero. Despite being less than one-quarter of land cover, protected landscapes are home to nearly half of all priority habitats in England, including 60% of deep peat, 34% of broadleaf woodland and nearly 88% of heather and acid grassland habitats<sup>1</sup>.

Climate change may mean that our protected landscapes look different in the future. This challenge requires us to consider the need to manage them differently, not just to conserve and enhance them, but to also play new roles in helping to both reduce our net emissions and enable nature and our communities to adapt to the unavoidable effects of climate change. The government's Net Zero strategy set out the importance of making the most of our natural resources to tackle climate change, including better use of our land to deliver nature-based solutions.

Despite the considerable efforts of our lead partners, the review highlighted that nature has been in long-term decline in our protected landscapes, and they are not contributing as they could to restore nature and respond to climate change. More action is clearly needed to make these special places bigger, better and more joined up spaces for nature, and to help tackle climate change and adapt to its impacts.

This chapter sets out how we will put our protected landscapes at the heart of delivering our nature recovery and climate policies and show leadership on the international stage for how this can be achieved. Our approach will ensure our protected landscapes contribute to our vision to 'drive forward nature recovery, and build our resilience to climate change'.

### The Nature Recovery Network and 30 by 30

The Nature Recovery Network aims to join up and make space for nature across England. Given their spatial scale, and track records in planning and delivering landscape-scale restoration projects, protected landscapes could play a particularly important role in the delivery of the Nature Recovery Network (Proposal 4).

Local Nature Recovery Strategies (LNRSs) will provide the underpinning framework for the Nature Recovery Network and will provide the focus for a broad range of funding and

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<sup>1</sup> Natural England data

delivery activities. We will explore ways for protected landscapes to support responsible authorities in preparing and delivering LNRs, utilising their expertise to highlight landscape-scale opportunities within protected landscapes and embedding links with their statutory management plans so they align. This role will help to ensure neighbouring LNRs set out coherent, ambitious strategies for nature recovery across whole landscapes that cross administrative boundaries.

Our Nature Recovery Green Paper will set out how we aim to achieve our goal to protect 30% of our land for nature by 2030. At present, under their current statutory purposes, level of protection and management, protected landscapes cannot be said to contribute towards 30 by 30 in their entirety, and they must do more to drive the recovery of nature. Applying our framework for what should count to 30 by 30 as set out in our Nature Recovery Green Paper will allow us to identify and prioritise where reform and investment are most needed in our protected landscapes. However, this will also require lead partners and their local partnerships to step up to this challenge. We want all protected landscapes to have clear visions for nature recovery but these must also collectively make a major contribution to national nature recovery outcomes. By strengthening the first purpose for nature, supporting stronger protections and management and monitoring progress, we will ensure these areas can contribute to this ambitious commitment for biodiversity and our wider nature recovery ambitions.

## A stronger mission for nature recovery

We agree with Proposal 1 that the current statutory purpose to 'conserve and enhance' is not strong enough. This does not reflect that many of our existing landscapes are now badly degraded, or the urgency of the fight to tackle biodiversity loss. We will therefore strengthen this purpose, making it clear that we need to actively recover nature in these areas, rather than simply conserve what remains. A strengthened purpose for nature would also be more closely aligned with national policy objectives, increase the weight given to nature recovery by public bodies, and reinforce that these areas should contribute to our target to halt the decline in species abundance by 2030 and our 30 by 30 commitment.

We support the intention of the wording proposed by the panel. We propose to amend the current statutory purpose so that:

- A core function of protected landscapes should be to drive nature recovery
- A revised purpose should be more specific with regards to nature outcomes and explicitly mention biodiversity
- The principle of natural capital should also be included to capture the societal value of nature in our protected landscapes and encompass a broader range of ecosystem services.

As explained in Chapter 1, we also intend to create a single set of statutory purposes for AONB teams and National Park Authorities, providing a more consistent and unified statutory framework for all protected landscapes. We will carefully consider any changes to this statutory purpose for the Broads, which has a third statutory purpose in relation to navigation, while the ‘Sandford Principle’<sup>2</sup> does not apply.

For details of how to provide your views on this issue, please see **Annex A – Consultation**.

## Setting ambition and monitoring progress

We agree with proposals 2 and 3 that improving our monitoring and reporting in protected landscapes will help us to understand the state of nature and prioritise action towards our desired environmental outcomes.

By January 2023, new ambitious outcomes will be agreed for the role of protected landscapes in delivering on the government’s goals for nature recovery and climate, aligned with the revised 25 Year Environment Plan and interim environmental targets under the Environment Act 2021 and the Net Zero Strategy. Natural England will monitor and evaluate progress against the key indicators and outcomes and will also support individual protected landscapes to translate these targets into their management plans.

We are developing the Natural Capital and Ecosystem Assessment (NCEA), which will provide data on habitats, natural capital, and ecosystem function. This will help to monitor progress against agreed outcomes. Combining earth observation technology and data science with professional field surveys and citizen science, this tool will inform the priorities of protected landscapes, including flood risk reduction, boosts to wildlife, water air quality improvements, and opportunities for biodiversity net gain. Ambitious goals to increase carbon sequestration, together with improved natural capital reporting, should be embedded in all protected landscapes' management plans. Management plans should also set out their local response to climate adaptation, managing long-term landscape change to increase the resilience of local communities and ecosystems.

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<sup>2</sup> As per the Environment Act 1995, the Sandford Principle states that, where there is a conflict between the statutory purposes of national parks, any relevant authority "shall attach greater weight to the purpose of conserving and enhancing the natural beauty, wildlife and cultural heritage of the area comprised in the National Park".



## Agricultural transition

Proposal 5 makes the case for the special significance of protected landscapes to be reflected in environmental land management schemes. Recognising the distinct status of protected landscapes as part of the Agricultural Transition Plan, the FiPL programme has already demonstrated the value of the knowledge and expertise our lead partners can offer when developing and delivering agri-environment schemes.

We will build on lessons from the FiPL programme to develop the new environmental land management schemes. We are considering a number of options for how the special status of protected landscapes can be reflected in environmental land management schemes' design and delivery. These could include:

- Designing the environmental land management schemes in a way that works for all farmers and land managers, including the specific circumstances for those in protected landscapes, recognising that farmers in these areas are well-placed to deliver on our environmental priorities.
- Using Local Nature Recovery Strategies to identify projects or habitats within protected landscapes.
- Monitoring the effectiveness and uptake of the new environmental land management schemes in protected landscapes. Using this to inform whether further interventions are needed to ensure we are on track for wider nature recovery ambitions.
- Creating a clear role for protected landscape organisations in the preparation of Local Nature Recovery Strategies. Our recent LNRS consultation specifically asks for views on the role of different organisations in the preparation of LNRSs, including protected landscapes.
- Building on FiPL, empowering protected landscapes to support decision-making and delivery against agreed priorities, including through dedicated project coordinators and advisers.

Defra will be working closely with partners and stakeholders to develop these options further to ensure we settle on the right one for all parties, and there will be more opportunities to feed into environmental land management schemes design as it progresses.

For details of how to provide your views on this issue, please see **Annex A – Consultation**.

## Chapter 3: People and place

The review highlighted the opportunities for protected landscapes to deliver for everyone so that the benefits for health and wellbeing are available to all parts of society especially considering the need to reduce health inequalities. Changes are needed to improve access and support local economies in order to achieve our vision for protected landscapes to ‘support thriving local communities and economies, improve our public health and wellbeing’.

### Landscapes for everyone

The review included proposals to increase engagement with all parts of society, particularly younger and more diverse audiences (proposals 8 and 9), through expanded volunteering (proposal 11), supported by increased rangers (proposal 13). Programmes such as [Generation Green](#) demonstrate that national-scale partnerships and coordinated collaboration can augment what our lead partners are already doing so well. We are therefore aiming to establish a national coordination function through the new national landscapes partnership that can work with our lead partners to enhance and expand community engagement through national strategic partnerships and collaborative campaigns. This could expand their collective capacity to plan and promote events, programmes and volunteering opportunities that focus on connecting young people with nature, increasing the ethnic and socio-economic diversity of visitors, and aiding people with disabilities to enjoy our protected landscapes.

We will also consider using the powers under the Agriculture Act and resources under the Farming in Protected Landscapes Fund to support or reward landowners for offering enhanced access to their land in some circumstances.

We are also actively developing opportunities to work across government to strengthen the role that protected landscapes can play in supporting the country’s health, wellbeing, and education. We are seeking ways to:

- Work strategically with the Probation Service’s community payback scheme
- Support capacity building in schools to engage with nature
- Enable protected landscapes to deliver for green social prescribing provision

Additionally, we recognise that rangers are fundamental to enhancing and harnessing the benefits that protected landscapes offer. We will seek ways to increase the number of rangers engaging with people in protected landscapes.

## A stronger mission for connecting people and places

We agree with proposal 7, that a strengthened second statutory purpose for National Park Authorities would clarify and reinvigorate our lead partners' ambition to connect all parts of society with our protected landscapes. As explained in Chapter 1, we intend to create a single set of statutory purposes for AONB teams and National Parks Authorities, providing a more consistent and unified statutory framework for all protected landscapes. We therefore agree that this strengthened purpose should be extended to AONBs teams.

We support the intention of the wording proposed by the panel. We propose to amend the current statutory purpose to:

- Highlight the need to improve opportunities and remove barriers to access for all parts of society
- Clearly reference public health and wellbeing as an outcome
- Take a more active role in supporting access than just promoting opportunities

For details of how to provide your views on this issue, please see **Annex A** – Consultation.

## Supporting local communities

Proposal 17 suggested creating a new statutory purpose to foster the economic and community vitality of their area. However National Park Authorities, AONB Conservation Boards and the Broads Authority already have a statutory duty that relates to the economic and social well-being of local communities. Local authorities hosting AONB Partnerships also have existing statutory responsibilities to consider the rural economy. We also consider that there are risks that introducing a third purpose could dilute the importance of the existing purposes and have unintended outcomes such as impacts on future designations.

We recognise the importance of supporting rural communities and share the panel's desire to support vibrant local communities, however we do not consider that a new statutory purpose is the appropriate policy to achieve that objective. Instead, we will support our lead partners to discharge their existing duties effectively and consistently through government guidance and sharing best practice. The government will also support local communities through programmes such as the FiPL programme, which is helping farmers capitalise on the many social and financial benefits that the Visitor Economy generates in protected landscapes.

## Sustainable transport

In relation to proposal 19, the government supports the Lake District National Park Authority and Cumbria County Council developing new sustainable ways to access the National Park that may transform public transport in the area and become a blueprint for other protected landscapes.

Many protected landscapes require bespoke transport arrangements. For example, Peak District National Park Authority, with South Yorkshire Combined Authority and Derbyshire County Council, are to consider new types of Demand Responsive Transport (DRT) services. Local authorities should consider opportunities such as these as part of their wider transport plans. The government is updating guidance around Local Transport Plans, which will reinforce the need for local authorities to consult appropriately with key stakeholders including National Park Authorities and Destination Management Organisations (DMOs). Our proposals to strengthen the statutory purposes of protected landscapes and strengthen the duty of regard (Chapter 4) should increase the weight local authorities give to supporting local rural communities and the public's enjoyment of protected landscapes through their transport plans.

## Open access land

Proposal 16 recommends expanding open access rights to provide additional recreational opportunities. We aim to review the open access maps to clarify rights and inform any further consideration of expanding open access rights. We will also continue to pay for heritage, access and engagement through our existing schemes and we will consider how to maintain investment in these areas as part of future schemes. In parallel, we will also explore the barriers that may exist to the provision of permissive access by landowners and seek to remedy these.

## National Trails

We agree with proposal 15 that National Trails should be more joined up with our protected landscapes, particularly in the planning and delivery of initiatives to improve access to the natural environment. A new charity is being formed as a single, strategic body for all National Trails. This will unify and strengthen their voice and help to integrate the work of our lead partners. We are exploring the potential to include the National Trails charity as a member of the new national landscapes partnership (see Chapter 1).

## Sustainable tourism

The government's [Tourism Recovery Plan](#) recognises that the government has a role in helping the tourism industry play its part in contributing to the conservation and enhancement of cultural, natural and historic heritage, and avoiding damage to the environment. VisitBritain/VisitEngland are celebrating and sharing sustainable best practice and working with the sector to put the UK's natural environment, including our protected landscapes at the heart of the country's brand proposition. To identify and deliver further ways to help the industry to grow back greener, we have also committed to producing a Sustainable Tourism Plan, working with the wider Visitor Economy sector and VisitBritain/VisitEngland, and will be engaging with representatives from the protected landscapes to help inform that plan.

### Managing visitor pressures

Since the review was published, rangers in protected landscapes have observed increased visitor numbers and an increase in anti-social and hostile behaviour. In response, Natural England has revised the [Countryside Code](#), and run a communications campaign to improve people's understanding of the countryside and promote socially and environmentally responsible behaviours. However, providing visitors with clearer information has not been sufficient to fully address these ongoing issues.

We are therefore considering making a greater range of enforcement powers available to National Park Authorities and the Broads Authority to help manage visitor pressures and make National Parks a more pleasant and safe place to live and visit. These are powers to:

- Issue Fixed Penalty Notices for byelaw infringements - this would simplify the process and reduce enforcement costs. Increasing the penalties would also act as a stronger deterrent and provide reassurance to local communities.
- Make Public Space Protection Orders (PSPOs) – this would reduce administration costs where multiple local authorities have jurisdiction across a National Park and ensure there is a consistent approach where PSPOs are deemed necessary to deter genuinely antisocial behaviour. This would only be used following consultation with LAs.
- Issue Traffic Regulation Orders (TROs) to control the amount and type of traffic on roads – this would help to tackle and deter problems caused by vehicles that could lead to damage to sensitive environments or wildlife and allow National Park Authorities to respond more quickly to emerging traffic issues.

Some country public rights of way and unsealed unclassified roads known as 'green lanes' allow for the legal recreational use of motor vehicles. Whilst many users make use of these rights in a responsible way, we have become increasingly aware of damage and

disturbance caused by excessive use of off-road motor vehicles on some unsealed routes. This can result in impacts on local wildlife, the special qualities of an area e.g., tranquillity, and make the route less accessible for other users such as those on foot, bicycles, horseback, or in vehicles used by disabled people. In protected landscapes, these impacts could undermine the statutory purposes of the area.

We are also aware that these unsealed routes often provide essential vehicular access for local residents and businesses, and recognise that many people enjoy using motor vehicles responsibly on green lanes without causing damage or disturbance. Vulnerable groups such as disabled or elderly people are also likely to be particularly reliant on vehicular access in rural areas including via community transport.

We therefore would like to explore the options available for protecting our green lanes while maintaining most public and private access rights, particularly for residents or businesses. This could be achieved by giving greater discretion for National Park Authorities and local highway authorities to use existing powers to restrict use on a case-by-case basis. Alternatively, the government could consider restricting the use of certain motor vehicles on unsealed roads through legislation, but only if this could carefully balance the needs of all users including motorised vehicle users, horse riders, cyclists and walkers, whilst also protecting private access rights.

We will also continue to work to manage visitor pressures through visitor dispersal. A key objective in the government's Tourism Recovery Plan is for visitor spending to grow year on year in every nation and region of the UK, not only within but beyond the usual tourist 'hotspots' to smaller, lesser-known destinations - including the lesser-visited protected landscapes. For example, we have supported this through many [Discover England Fund](#) projects, which are well suited to meet the renewed interest in outdoor experiences and showcase lesser-known destinations.

For details of how to provide your views on this issue, please see **Annex A** – Consultation.

## Planning reform

A strong and effective planning system must sustainably balance protections with supporting local communities and economies. This balancing exercise must be carried out differently in protected landscapes, to ensure their statutory purposes and special qualities are meaningfully protected. This involves giving greater weight to their special qualities in planning policies, procedures, and decisions. For example, the recent revision of the [National Planning Policy Framework](#) (NPPF) (2021) clarified that development in the setting of protected landscapes should be sensitively located and designed to avoid or minimise adverse impacts.

As we consider planning reforms, we recognise the special role that protected landscapes hold within the planning system and will continue to explore opportunities for how this role could be developed further. An integral part of reviewing the planning reforms is considering how they align with and support our wider mission to level up the country and regenerate left-behind places.

As part of planning reform, we intend to review the NPPF, and we will further consider how policy for protected landscapes is set out. The Environment Act 2021 will also embed a biodiversity net gain approach into the planning system in England. This new requirement to offset unavoidable impacts of development will create new opportunities to conserve and enhance habitats and ecological networks, including within protected landscapes.

### **The role of AONB teams in planning**

The review highlighted the important role of the National Park Authorities and the Broads Authority in delivering high-quality, sustainable development through effective use of their planning powers. Their local plans have an important role to play in achieving our vision, providing certainty to businesses and communities, offering opportunities to connect habitats and wildlife, and driving action on climate change.

AONB teams also make a valuable contribution to the planning process through a range of tools including evidence gathering and issuing of planning and design advice to inform plan-making and planning applications. This can contribute to the delivery of good quality development in keeping with local character and meeting the AONB teams' purpose. However, the review found that AONB teams do not always have the resources to meaningfully engage with the planning system, and their advice is sometimes given limited weight in planning decisions. Proposal 6 therefore suggested that their role in the planning system should be strengthened.

We recognise that AONB teams can bring substantial evidence and expertise to the planning process, and we wish to seek views on how the AONB teams can achieve better outcomes through the plan-making process.

The review also identified strong support for AONB teams to be granted statutory consultee status for planning applications. Whilst we acknowledge the resource implications this would place on AONB teams, we recognise the benefit of further strengthening their role and are seeking views on this potential change.

For details of how to provide your views on this issue, please see **Annex A – Consultation**.

## Permitted Development

The review also highlighted that certain permitted development rights may impact landscape quality, and proposal 6 suggested a review of existing rights.

We recognise that permitted development rights can play an important role in delivering new homes, particularly in rural areas. This benefits householders and businesses. We will continue to monitor the use of permitted development rights in protected landscapes, and identify future opportunities to review their use.

## Affordable housing

We share the concerns raised in the review regarding the availability of affordable homes to support sustainable communities in protected landscapes. However, this issue is not unique to protected landscapes, and as such our policy response considers all rural areas.

Existing rural housing associations are already helping to increase the supply of new and affordable homes in protected landscapes. We do not believe that a new, publicly funded housing association specifically for protected landscapes recommended under proposal 18 would be any more effective at targeting the underlying challenges of finding suitable and economically viable small sites in these areas. Indeed, a new housing association could even harm the viability of existing rural housing associations.

We are instead progressing alternative means to deliver suitable housing for local communities in rural areas, including protected landscapes. For example:

- Rural Exception Sites deliver affordable housing in perpetuity to meet local needs in rural areas. When used effectively, these sites can provide vital affordable housing for local communities. We have recently published planning practice guidance to help those involved in the process to bring forward more of these sites in the future;
- Homes England's funding prospectus for the new 2021-26 Affordable Homes Programme continues to support the delivery of rural housing.



## Chapter 4: Supporting local delivery

Achieving our vision will rely on effective local delivery, driven and directed by our lead partners, providing local leadership and working within strong local partnerships. While the review praised the excellent work and commitment of our lead partners, it also made some proposals to improve local delivery. This chapter sets out how we will boost local delivery of outcomes through changes to governance, financing and legislation.

### Local governance

We need local governance that creates the conditions for consistently high standards of collaboration towards shared strategic priorities but that is flexible enough to adapt to local circumstances. Local governance structures should create a careful balance of democratic accountability, essential skills, and diversity of experience.

### **National Park Authorities, the Broads Authority and AONB Conservation Boards**

Board members bring time, energy and expertise. Despite the passion and commitment of these individuals, the review (proposal 26) found that these boards do not always function as well as they could, sometimes due to the restrictive legislation they operate within. To support boards to deliver their full potential, we are developing a flexible package of statutory and non-statutory measures to achieve the following improvements, which we will develop in consultation with board members.

#### **Improved performance**

Setting clear performance standards and agreed expectations will get the best out of board members and deliver better outcomes. This could include a standard role profile, a shared code of conduct, regular skills audits, and improved training. To empower boards to address poor performance, these measures should be supplemented by performance reviews, fixed-term appointments, and a streamlined process for removing underperforming members.

#### **Strengthened local partnerships**

We would like to see greater integration of advisory panels into the development and implementation of statutory management plans by providing specialist expertise and ensuring local voices are heard on decisions that impact local communities.

#### **Skilled, diverse and representative boards**

We agree that for protected landscapes to benefit all parts of society, their boards must better reflect that society. The review highlighted a need for greater diversity, and we have begun to address this through improvements to the Secretary of State public appointments process. This has significantly increased the proportion of candidates who are female and/or from an ethnic minority background. There is still more to do, and we will continue to embed diversity, equity, and inclusion best practices into our public appointments.

While we are seeing positive change in our national appointments, these comprise a minority of the overall board members. We disagree with proposal 26 that all members be appointed nationally given the important role locally elected members play in giving the boards democratic legitimacy. Instead, we are considering removing the strict legislative requirements for a specific ratio between appointment types. Boards would still need national, parish, and local authority members but they would have more flexibility to balance diversity and expertise with strong democratic oversight in accordance with the needs of their specific area.

Another option would be to introduce a more merit-based approach to local nominations, encouraging local authorities to put forward their best candidates considering similar desirable criteria as Secretary of State appointees. This would retain vital democratic accountability while helping to identify the best local representatives to create engaged, diverse, and appropriately skilled boards.

### **Improved efficiency**

Reducing board sizes would simplify decision-making processes, boost efficiency and follow best practice governance models. Proposal 26 recommended capping boards at 12 members, but this may not be appropriate in areas with large numbers of local authorities. We are already in discussion with a number of National Park Authorities about potential board reductions on a case-by-case basis. Reductions should not be at the expense of the skills, expertise and diversity needed. In cases where a large board is necessary or advantageous, clear guidance on structuring and organization may boost efficiency.

### **Strategic alignment**

Currently, boards select a chair from amongst their members. Proposal 26 suggested that the chair should be appointed by the Secretary of State, in line with Defra's public bodies, which we believe could provide greater continuity, strategic direction, and accountability.

For details of how to provide your views on this issue, please see **Annex A** – Consultation.

### **AONB Partnerships**

Although proposal 26 focussed on National Park Authorities the Broads Authority and AONB Conservation Boards, many of the issues highlighted in the review are relevant to

AONB partnerships. Government has less direct influence over governance structures hosted by local authorities, but we want to encourage positive reforms.

Natural England will replace the former Countryside Agency guidance for AONB Partnerships, to set out clear governance principles, processes, and structures that local authorities would be expected to follow. This guidance will be flexible enough to be adapted to local circumstances but would aim to improve consistency, performance, and transparency. To ensure a high level of uptake and incentivise positive reforms, we could include conditions in our grant agreements, requiring evidence that this guidance has been applied to local governance structures and processes.

## Management plans

Proposal 3 called for strengthened management plans which set clear priorities and actions for nature recovery and the response to climate change. Our proposed national landscapes strategy will set the national ambition for the expected contribution of protected landscapes towards nature recovery and climate mitigation and adaptation, along with other key goals such as access and community engagement. This will help to align local management plans with relevant national policies and targets such as the goals of the 25 Year Environment Plan and net zero. Natural England will review all revised management plans, ensuring that these make fair and ambitious contributions. To facilitate this new process, Natural England will also update their guidance on management plans for protected landscapes.

Natural England will produce an outcomes framework, provide annual reporting to track progress against the outcomes, and advise on where further action is needed. We will also ensure clear alignment with Local Nature Recovery Strategies, to facilitate delivery of priority nature recovery actions without duplication. As we look to strengthen management plans, we will also consider how best to ensure a smooth transition so that valuable work is not lost.

## A clearer role for public bodies

Public bodies have a huge influence on the protection and management of protected landscapes through their policies, programmes, projects, authorisations, and land management practices. It is therefore essential that they take account of the statutory purposes and the relevant management objectives when making decisions relating to protected landscapes, whilst carefully balancing this with the needs of other legitimate land uses such as forestry, agriculture or defence.

Proposal 3 highlighted that the existing duties for public bodies to 'have regard' to the statutory purposes are too weak. The vagueness of the duties can lead to disagreements

about their interpretation and allow damaging practices to occur. We therefore propose strengthening the wording of these statutory duties so that they are given greater weight when exercising public functions.

The current duties are also not clear that public bodies are expected to contribute to the delivery of management plans, which can lead to the underperformance of key partners and under-delivery of management plan objectives. The wording should also be made clearer with regards to the role of public bodies in preparing and implementing management plans.

The government will produce guidance for public bodies on the application of the strengthened duties, making it clearer when and how it should be discharged in respect of public functions. These changes would help avoid disputes, reduce damaging practices, and lead to much more effective management of our protected landscapes.

For details of how to provide your views on this issue, please see **Annex A** – Consultation.

## Sustainable financing

We are proposing an ambitious new vision for our protected landscapes, but the scale of this ambition must be matched by equivalent resources to ensure effective delivery, particularly in AONB teams. We support the principle of proposal 27 that we need to pursue a new funding model to deliver increased and more diverse sources of funding, building on the progress that is already being made in this area.

The government's core grant is essential to supporting our lead partners. We agree with the review's proposal that the grant allocation model should be reviewed to ensure transparency. We have already increased the grant settlement for AONB teams by almost £1 million (15%) for the current financial year, however there is relatively limited scope to increase the core grant by the scale suggested in the review, or to provide longer funding settlements that extend beyond a spending review period. Therefore, the core grant does not provide the opportunity to increase funding to the scale needed to deliver our vision.

There has been increasing interest in private and blended financing models for nature recovery and nature-based solutions, and we believe that this area provides significant opportunities to lever more investment into protected landscapes. The government has recently set an ambitious new target to raise at least £500 million in private finance to support nature's recovery every year by 2027 in England, rising to more than £1 billion by 2030. Much of this could be generated through the sale or trade via environmental markets of the various benefits nature provides – from carbon sequestration to improved water quality. We are working with industry leaders, such as the Financing Nature Recovery Coalition, to understand how to accelerate these markets, whilst ensuring transparency, integrity and the delivery of real environmental improvement. We are

already supporting a number of nature projects in protected landscapes to attract private investment through our [Natural Environment Investment Readiness Fund](#), as well as developing a public-private blended impact fund.

Some of our lead partners have already started to attract private finance into protected landscapes, such as the National Parks Partnership [Net Zero With Nature](#) pilot programme. By learning from projects such as these, and providing the right support, data and expertise, we want to scale up and accelerate these approaches to unlock the economic value of the natural and cultural/heritage capital of our protected landscapes. We want the national landscapes partnership to build capacity to generate additional income through green finance initiatives and joint funding bids. This should include a dedicated national finance team with the right expertise to coordinate our lead partners to design a pipeline of investment-ready projects and maximise the value of investment for our lead partners and landowners. This has the potential to revolutionise the scale of resources available to support the delivery of our vision, particularly for nature and climate.

Protected landscapes have a strong national, and in some cases international, recognition as sites of exceptional environmental importance, natural beauty, and cultural heritage. It is this that drives an estimated 270 million visitors a year from the UK and overseas. The Lake District alone, a UNESCO World Heritage Site, received 19.9 million visitors in 2019. Despite this, evidence gathered during the review indicates that average commercial income of National Park Authorities and the Broads Authority other than fees for chargeable activities such as planning, parking and navigation, is understood to have been in the region of half a million pounds per annum each. This presents a huge, missed opportunity to date but also means there is a significant, largely untapped opportunity to be taken. We expect protected landscapes, individually and collectively, to develop and harness the commercial and sponsorship opportunities provided by their unique brand identity. Driving this agenda should be a key objective of the new national landscapes partnership, which should publish a commercial strategy within a year of being established and target a minimum of five new flagship partnerships across the network by 2025.

## General power of competence

National Park Authorities and the Broads Authority currently have specific powers to carry out activities clearly related to their statutory functions. However, this can create uncertainty around the activities that they can legally undertake, particularly related to commercial operations and partnerships. Given that we would like our lead partners to fully explore the commercial opportunities arising from green finance (described above), we do not want them to be constrained by this limited power of competence.

We are considering broadening the legal competence of National Park Authorities and the Broads Authority to a more general power, similar to that of local authorities. We believe this would support a more innovative and proactive role for the protected landscapes and

reduce legal risks associated with a wider range of activities such as affordable housing, public health, and sustainable transport, or working beyond their boundaries.

For details of how to provide your views on this issue, please see **Annex A – Consultation**.

## Annex A – Consultation

Implementing some aspects of our response to the review will require changes to legislation, subject to securing parliamentary time. We are seeking public views on support for these proposed legislative changes, and their potential effects on different groups and interests. We are also interested to hear any wider views on other aspects of our response to the review.

### How to respond

Please respond to this consultation using the Citizen Space consultation hub at Defra <https://www.gov.uk/government/consultations/landscapes-review-national-parks-and-aonbs-implementing-the-review>

For ease of analysis, responses via the Citizen Space platform would be preferred, but alternative options are provided below if required:

By email to: [Landscapesconsultation@defra.gov.uk](mailto:Landscapesconsultation@defra.gov.uk)

In writing to:

Consultation Coordinator, Defra  
2nd Floor, Foss House, Kings Pool  
1-2 Peasholme Green  
York  
YO1 7PX

### Questions

1. Do you want your responses to be confidential? If yes, please give your reason.
2. What is your name?
3. What is your email address?
4. Where are you located? *North East/North West/Yorkshire and The Humber/East Midlands/West Midlands/East of England/London/South East/South West/Remote*
5. Which of the following do you identify yourself as? *National Park Authority or the Broads Authority/AONB team/Local authority/Other public body/Environmental NGO/Other NGO/Professional body/Academic/Business/Resident of a protected landscape/Member of the general public/Other*

**A stronger mission for nature recovery** (p10)

6. Should a strengthened first purpose of protected landscapes follow the proposals set out in Chapter 2? *YES/NO/UNSURE.*

7. Which other priorities should be reflected in a strengthened first purpose e.g. climate, cultural heritage? *OPEN*

### **Agricultural transition** (p12)

8. Do you support any of the following options as we develop the role of protected landscapes in the new environmental land management schemes? Tick all that apply.
- *Designing the environmental land management schemes in a way that works for all farmers and land managers, including the specific circumstances for those in protected landscapes, recognising that farmers in these areas are well-placed to deliver on our environmental priorities.*
  - *Using Local Nature Recovery Strategies to identify projects or habitats within protected landscapes.*
  - *Monitoring the effectiveness and uptake of the new environmental land management schemes in protected landscapes. Using this to inform whether further interventions are needed to ensure we are on track for wider nature recovery ambitions.*
  - *Creating a clear role for protected landscape organisations in the preparation of Local Nature Recovery Strategies. Our recent LNRS consultation specifically asks for views on the role of different organisations in the preparation of LNRSs, including protected landscapes.*
  - *Building on FiPL, empowering protected landscapes to support decision-making and delivery against agreed priorities, including through dedicated project coordinators and advisers.*
9. Do you have any views or supporting evidence you would like to input as we develop the role of protected landscapes in the new environmental land management schemes? *OPEN*

### **A stronger mission for connecting people and places** (p14)

10. Should AONBs have a second purpose relating to connecting people and places, equivalent to that of National Parks? *YES/NO/UNSURE*
11. Should a strengthened second purpose of protected landscapes follow the proposals set out in Chapter 3 to improve connections to all parts of society with our protected landscapes? *YES/NO/UNSURE*
12. Are there any other priorities that should be reflected in a strengthened second purpose? *OPEN*

### **Managing visitor pressures** (p16)

13. Do you support any of the following options to grant National Park Authorities and the Broads Authority greater enforcement powers to manage visitor pressures? Tick all that apply.
- *Issue Fixed Penalty Notices for byelaw infringements*



- *Make Public Space Protection Orders (PSPOs)*
  - *Issue Traffic Regulation Orders (TROs) to control the amount and type of traffic on roads*
14. Should we give National Park Authorities and the Broads Authority and local highway authorities additional powers to restrict recreational motor vehicle use on unsealed routes? *YES/NO/UNSURE*
15. For which reasons should National Park Authorities, the Broads Authority and local authorities exercise this power?
- *Environmental protection*
  - *Prevention of damage*
  - *Nuisance*
  - *Amenity*
  - *Other [PLEASE STATE]*
16. Should we legislate to restrict the use of motor vehicles on unsealed unclassified roads for recreational use, subject to appropriate exemptions? *Yes – everywhere/ Yes – in National Parks and Areas of Outstanding Natural Beauty only/Yes – in National Parks only/No/Unsure*
17. What exemptions do you think would be required to protect the rights and enjoyment of other users e.g., residents, businesses etc? *OPEN*

### **The role of AONB teams in planning** (p18)

18. What roles should AONBs teams play in the plan-making process to achieve better outcomes? *OPEN*
19. Should AONB teams be made statutory consultees for development management? *YES/NO/UNSURE*
20. If yes, what type of planning applications should AONB teams be consulted on?
- *AONB teams should formally agree with local planning authorities which planning applications should be consulted on.*
  - *AONB teams should be consulted on all planning applications that require an Environmental Impact Assessment and are categorised as 'major development' as well as Nationally Significant Infrastructure Projects.*
  - *Other [Please state]*

### **Local governance** (p20)

21. Which of the following measures would you support to improve local governance? *Tick all that apply.*
- *Improved training and materials*
  - *Streamlined process for removing underperforming members*
  - *Greater use of advisory panels*
  - *Greater flexibility over the proportion of national, parish and local appointments*

- *Merit-based criteria for local authority appointments*
- *Reduced board size*
- *Secretary of State appointed chair*
- *Other [Please state]*

### **A clearer role for public bodies** (p22)

22. Should statutory duties be strengthened so that they are given greater weight when exercising public functions? *YES/NO/UNSURE*

23. Should statutory duties be made clearer with regards to the role of public bodies in preparing and implementing management plans? *YES/NO/UNSURE*

### **General power of competence** (p24)

24. Should National Parks Authorities and the Broads Authority have a general power of competence? *YES/NO/UNSURE*

### **Overall**

25. If you have any further comments on any of the proposals in this document, please include them here. [FREE TEXT]

## **Confidentiality and data protection**

This discussion document and consultation process have been planned to adhere to the Consultation Principles issued by the Cabinet Office.

Representative groups are asked to give a summary of the people and organisations they represent and where relevant who else they have consulted in reaching their conclusions when they respond.

Information provided in response to this consultation, including personal data, may be published or disclosed in accordance with the access to information regimes these are primarily the Environmental Information Regulations 2004 (EIRs), the Freedom of Information Act 2000 (FOIA) and the Data Protection Act 2018 (DPA). We have obligations, mainly under the EIRs, FOIA and DPA, to disclose information to particular recipients or to the public in certain circumstances.

If you want the information that you provide to be treated as confidential, please be aware that, as a public authority, the Department is bound by the Freedom of Information Act and may therefore be obliged to disclose all or some of the information you provide. In view of this it would be helpful if you could explain to us why you regard the information you have provided as confidential. If we receive a request for disclosure of the information, we will take full account of your explanation, but we cannot give an assurance that confidentiality

can be maintained in all circumstances. An automatic confidentiality disclaimer generated by your IT system will not, of itself, be regarded as binding on the Department.

This consultation is being conducted in line with the Cabinet Office “Consultation Principles” and be found at: [www.gov.uk/government/publications/consultation-principles-guidance](http://www.gov.uk/government/publications/consultation-principles-guidance).

If you have any comments or complaints about the consultation process, please address them to:

Consultation Coordinator

Area 7C,

Nobel House 17 Smith Square,

London,

SW1P 3JR.

Or email: [consultation.coordinator@defra.gov.uk](mailto:consultation.coordinator@defra.gov.uk)

