

## Ramblers Written Evidence to the Review of Designated Landscapes

[Questions 1-5 inclusive are introductory and are not repeated here]

### 6. We would love to know what makes National Parks and AONBs special to you.

The National Parks and AONBs have a special place in Ramblers history. We have campaigned for the establishment and protection of National Parks in Britain ever since our formation in 1935. We played a leading role in the work that took place in the 1930's and 1940's, which led to the National Parks and Access to the Countryside Act 1949. Our first paid secretary, the late Tom Stephenson, and one of our past presidents, the late Francis Ritchie, played central roles in formulating proposals for those parts of the Act which dealt with National Parks, rights of way and access to open country. The 1949 Act was brought in after WWII, when the country had united in defence of our "green and pleasant land" and is an enduring peace-time legacy.

The Ramblers has continued to strive for the vision of the national parks movement pioneers. We have campaigned for our most cherished landscapes to be managed for the nation, rather than subject to local pressures, and for them to be accessible by all those who wish to explore them on foot, whatever their level of income. Across the country, Ramblers volunteers work closely with those managing them including National Park Authorities, AONB boards and the National Trust.

We believe that the National Parks and AONBs also form a special part of our future. The National Parks and public access to the countryside went hand in hand in the 1949 Act. The designated landscapes are where we can prove, as a society, that we can manage the landscape sustainably for present and future generations – for the recreation, inspiration, mental and physical health and wellbeing of the nation.

National Parks and AONBs are special to Ramblers members, volunteers and members of the public in many ways including:

*"Being connected with nature, the beauty and the elements. Long distance paths and the feeling of connection within the country or area of the country that walking one, even in bits over time, gives me. A love of my country and cherishing areas within it by National Park or AONB status... There is a feeling of well being, both physical and mental/emotional, that is hard to describe to anyone who has not experienced it, which arises from walking and spending time in National Parks and AONBs."*

*"Because they feed my soul, body and mind. They are places where nature can be enjoyed. The beauty of our islands appreciated in comparative quiet and reduced pollution. They are essential"*

*"For me the National Parks are areas of peace and tranquillity. They engender a feeling of calm and provide an area to get away from the hurly-burly of modern day life and a place to contemplate and clarify one's mind. Although very little of the British landscape is natural and is managed and farmed, the Parks are areas of a countryside less touched by human hand. They are therefore more natural and restful, having an apparent slower way of life."*

*"Their role in preserving and protecting beautiful countryside."*

*"I treasure memories of walking and camping in the Yorkshire Dales, Lakes, and North York Moors National Parks."*

*“They exist to permit the public to enjoy the most attractive parts of the countryside in the knowledge that they will not be subject to inappropriate development. They also host many long distance trails, which are important for attracting walkers, cyclists and horse riders from within Britain and abroad. They are full of attractive villages with quaint pubs!”*

*“The scenic environment due to an absence of heavy industry”*

*“The promotion of enjoyment”*

*“Because they provide for “quiet enjoyment” of the countryside, enshrined planning policy”*

*“The North Wessex Downs AONB is special to me because of the beautiful and diverse species of wild flowers on the chalk grassland and the clear chalk streams”*

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

We consider that the statutory purposes of the protected landscapes are as valid today as they were when they were formed and that these should be retained and reinforced. Any amendments should reinforce the promotion of enjoyment via pursuits which are sympathetic to the other statutory purposes and in keeping with the character of the landscape so that the second statutory purpose upholds the first.

Where correctly applied, the Sandford Principle is beneficial for protecting natural beauty from inappropriate and unsustainable recreational activities. However, we are aware that it has sometimes been misapplied to infer that appropriate public access should be excluded in favour of conservation objectives, rather than managed.

## **8. What do you think does not work overall about the system and might be changed? Add any points that apply specifically to National Parks or AONBs.**

### **Protecting designated landscapes**

Land within the designated landscapes should be strictly protected against development and damaging activities including mining, quarrying, oil and gas exploration, waste disposal, some types of forestry, wind turbines, new motorway service areas, unnecessary fencing, and noisy activities (e.g. activities involving off-road motoring). In recent years, the Government has signalled a willingness to support major developments in protected landscapes including road building, storage of nuclear waste and fracking. We are deeply concerned about the way in which this undermines the protections given to protected landscapes under the planning system. Planning decisions should be made with the in alignment with the statutory purposes and not solely on economic grounds. In addition, at present, the system gives protection to the designated area, but leaves land just outside vulnerable to extra pressures for development, for example house-building and quarrying.

The Ramblers is opposed to military training in National Parks that impacts on the public’s quiet enjoyment of the parks. Consideration could be given to strengthening the duty on public bodies to have regard to the purposes of the National Parks under Section 62 of the Environment Act 1995. For example, this could be strengthened to a duty of due regard or a duty to further the purposes. Where the Ministry of Defence is not using land for the purpose for which it was acquired this should be open to public review, with a presumption in favour of allowing public access.

### **Parity of designated landscapes**

At present, the public perception is perhaps that National Parks and AONBs are two different levels of organisation with different aims. Government should recognise that AONBs are equal in status and quality to National Parks. Their landscapes are equally deserving of protection and enhancement and they face many similar issues.

### **Funding**

National Park authorities and AONB boards should be adequately funded so that all of their statutory functions can be fulfilled. We recognise the current constraints on public finances and our volunteers are supporting where they can. However, an adequate level of funding is needed to enable these landscapes to be managed for future generations and to continue to generate revenue from sustainable sources. We are concerned that National Park Authorities are being forced into selling off land to raise money with few safeguards on the use of the land after sale and that AONBs receive a small fraction of a dwindling budget for designated landscapes.

### **Consistent management of AONBs**

AONBs have generally had a much lower public profile than the National Parks. Changes are needed to make the protected landscapes more integrated and on a footing commensurate with the high quality of their landscapes.

Planning in AONBs is complicated by, in some cases, responsibilities resting with several different councils. In some instances, local planning authorities also overrule objections by AONB boards on planning matters relating to their AONB. Planning policy should be integrated across these landscapes to ensure they can be managed consistently, and in line with the purposes and duties of the AONB, with AONBs providing their vision for development control across the landscape. AONB boards should have greater influence over planning decisions that affect them and local authorities should have a stronger duty to support the purpose of the AONB.

There are strengths in the AONBs' current structure: enabling them to work in partnership with a wide range of stakeholders in a way that could be more difficult for a planning authority; and the flexibility to adapt to the requirements of a particular landscape and locality.

AONBs have no clear statutory purpose relating to public access, although they do have a duty to meet demands for recreation (without comprising the original purpose of conserving and enhancing their natural beauty). This is key difference to the role of National Park Authorities, despite AONBs often being located close to centres of population. We consider that further evaluation of the purpose of AONBs would be helpful and that access be given a higher profile within their purposes, ensuring that the purpose enables AONBs to have sufficient influence in connecting people to nature and cultural heritage. This would enable AONBs to play a stronger role in delivering the ambitions of the Government's 25 Year Environment Plan and align strongly with the existing purpose to conserve and enhance natural beauty, and the Ramblers would be keen to support them in this. The role of AONBs in public access should dovetail with the responsibilities of the local authorities and be consistent across all AONBs, to avoid confusion. The level of resource the government provides to both parties would be critical for success.

At present, the purposes of National Parks and AONBs are expressed differently, which may be contributing to the public perception that they are unequal. It would be helpful to consider aligning the wording, without detracting from the meaning of their current purposes.

### **Integrated landscape management**

The current AONB duty (to take account of the needs of agriculture, forestry and other rural industries and of the economic and social needs of local communities; and to promote sustainable forms of social and economic development) aligns strongly with the need for integrated landscape management set out elsewhere in our response. Particular regard should be paid to promoting sustainable forms of social and economic development that in themselves conserve and enhance the environment.

**9. What views do you have about the role National Parks and AONBs play in nature conservation and biodiversity?**

The National Park Authorities and AONB boards work closely with Natural England to protect and enhance biodiversity. However, we are aware of concerns that Natural England's scarce resources are being devoted to nature conservation at the expense of managing responsible public access. Our view is that we can reverse the decline in biodiversity and foster a new level of understanding and support for the natural environment amongst the public only by managing farming, nature and public access together across all of our landscapes.

**a) Could they do more to enhance our wildlife and support the recovery of our natural habitats?**

Recent research by the Campaign for National Parks (Raising the bar: improving nature in our National Parks, CNP, 2018) showed that, although the Parks have greater biodiversity than the rest of the countryside, it is still in decline. We should have very high expectations of our National Parks and AONBs - they should have well managed access and abundant wildlife. The research raised important challenges such as understanding 'what success would look like' for nature conservation in each of these different and distinctive landscapes; the need for innovative, landscape scale approaches; and the need to develop a new suite of environmental outcomes for national parks.

Our protected landscapes could be far better connected. We consider that the National Trails, and other strategic walking routes, could form an interconnecting network of corridors for people and wildlife. These could link National Parks and AONBs but also connect, for example, National Nature Reserves and country parks. We can no longer afford to manage wildlife and people in separate and isolated pockets, whilst watching the decline of biodiversity, health and wellbeing in other areas.

Example: The Cornwall and Tamar Valley AONBs are quite fragmented and there could be a case for linking up the Cornwall AONB around the Cornish coast, potentially using enhancements along the South West Coast Path. This could add to the richness of what is already a spectacular walking route.

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

**Natural capital**

The National Parks and AONBs are some of our most spectacular and beautiful areas of countryside. We recognise that all of them are human-influenced living landscapes, rich in natural beauty but not completely natural wildernesses. They have been formed over the centuries by human activity and therefore their cultural heritage is an intrinsic part of the landscape. As such, they (and their settings) are dynamic and should be allowed to change, evolve and improve gradually over time. We would welcome changes that reflect and enhance their special qualities, while having the strong backing of government to refuse those that don't. For previous generations, the rate of change had been gradual, so that the character of the landscape evolved gradually over the centuries. Now the

potential and pressure for near instantaneous changes is much greater – changes that may be urban or incongruous in character and may significantly change the scenery.

The government committed, in the 25 Year Environment Plan, to using natural capital accounting to show the value of our natural resources. If applied rigorously, this should show that the cost of damage is greater in designated landscapes than in many other locations. It should therefore not be acceptable to grant permission for damaging developments based on short-term economic arguments. Given the intrinsic cultural and social capital of the protected landscapes, these should also be recognised and promoted in the policies of the National Parks and AONBs.

### **Landscape management and sustainable planning**

We are concerned that much of the expertise in landscape assessment and management has been lost from the National Park Authorities over time due to cut-backs. This has led, in some places, to nature conservation and landscape management being separated. As discussed above, it is imperative that our protected landscapes are managed in an integrated and sustainable way and they should have access to the expertise they require to manage their landscape in all its complexity. This includes cultural and historic landscape, landscape character, ecology and silviculture expertise.

In recent years, local planning and development control capabilities have also been severely affected by cuts in funding for staff and reductions in planning guidance in a bid to ‘cut red tape’. The Government should be ensuring that National Park Authorities, AONBs and local authorities with designated landscapes have all of the resources necessary to be at the forefront of sustainable planning, providing models of best practice which can be replicated in other areas of the countryside and reflected in the setting of the protected landscape. These models should be built on collaboration between all of the organisations whose activities influence the landscape. The government should provide tangible cross-departmental support for this process and we support the AONBs in their call for a national statutory advocate for landscape with more weight with central government departments and local planning and highway authorities.

**Example:** The Ramblers is a member of the Stakeholder Advisory Group of the National Grid Visual Impact Provision project. We are working, together with a range of governmental and non-governmental stakeholders, to support National Grid in their work to improve landscape quality by reducing the landscape impacts of their electricity infrastructure within National Parks and AONBs. The SAG has a strong commitment to collaborate with others wherever possible, such as other utility companies operating within these areas.

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

#### **Sustainable farming**

The designated landscapes should champion sustainable farming practices that promote biodiversity, provide appropriate public access, enhance the landscapes and enable it to adapt to and mitigate climate change impacts. They should be given equal support to achieve this, managed to a consistently high standard, and to provide models which can be replicated in the wider countryside. The objectives of any future agri-environment schemes should be aligned with the purposes of the designated landscapes and the objectives of their management plans.

We support the concept of public money for public goods within the post-Brexit agricultural and woodland creation payments system. Access, as a public good, should be supported by public money where necessary, particularly where this increases accessibility for all types of walker, including those with lower mobility. A strategic view should be taken so that public funds are directed where they are most needed, will have the greatest impact and deliver the best value (e.g. through an Environmental Land Management Scheme - ELMS).

### **Sustainable land management**

National Parks and AONBs should be exemplars of what we can achieve with sustainable land management using the natural capital accounting approach. Natural capital from public access should be considered based on the nature and location of the land.

### **Tree planting**

The government's ambitious tree planting targets are an opportunity to manage afforestation under ELMS with recognition of what is native to, and in character with, the particular designated landscape. We have an opportunity to learn from the past (for example the historic monocultural sitka spruce plantations in the uplands) and to ensure that our response to today's challenges, such as ash dieback, is more in keeping with the landscape and upholds the commitment to planting "the right tree in the right place", using local rather than imported stocks of saplings.

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

### **Current access**

Evidence shows that, although their resources are under pressure, National Park authorities (with their statutory purpose for understanding and enjoyment) are able to plan and maintain public access better than other highway and access authorities. Our Big Pathwatch report (The Big Pathwatch – The State of Our Paths Ramblers, 2016) showed that the more active custodianship of rights of way in National Parks resulted in 69% being well-kept and signposted, compared with an average of 56% across all the surveyed area.

However, the provision of public access is very different across the National Parks. For example, due to its nature and topography, almost none of the Broads has the right of open access because the land did not fit with the definitions in the Countryside and Rights of Way Act (2000) (the CRoW Act). Visitors expecting an enhanced level of public access in every National Park may therefore be disappointed.

### **Promoting access**

The landscapes of our National Parks and AONBs should be freely accessible for everyone, in all communities, and wherever possible they should be accessible to those with restricted mobility. National Park Authorities and AONB boards, together with Natural England, should have the resources to support and promote responsible public access. There are well documented benefits for mental and physical health and wellbeing from having greater opportunities to engage with the natural environment and the protected landscapes could provide the test bed for innovation in maximising these benefits.

In some areas there is pressure to favour tourist attractions that encourage visits by car, are not connected intrinsically to the landscape character and add to pressure of visitor numbers in 'honeypot' locations. We hear concerns from walkers over noise pollution affecting the tranquillity of the designated landscapes, such as motorsports and off-roading. Our protected landscapes are

rightly immensely popular with visitors and should be enjoyed by those from all parts of society. However, expectations for visitors should be managed to ensure that they understand the importance of tranquillity in the landscapes and can experience the 'great outdoors' safely, with joy and understanding. National Park and AONB policies should welcome people engaging in sustainable recreation.

We would like to see a presumption in favour of responsible public access within all National Parks and AONBs and a presumption against practices and developments which are unsustainable and/or do not enhance the character of the landscape. There may be other parts of our country which would benefit from developing a wider range of tourism experiences and visitor attractions to stimulate their economies, where this is in keeping with local planning policy.

We continue to raise with government our concerns that rights and responsibilities in the countryside need to be far more actively promoted so that, when people connect to nature, they do so safely and in a way that preserves its beauty.

### **Recommendations to protect and improve access**

More specifically, we would like to see:

- Pilot scale projects to test new public access models. Such pilots should examine how enhanced public access can be managed alongside nature conservation objectives and sustainable agricultural practices. These should explore the presumption in favour of access and could examine, for example, inclusion open access on additional land uses to those currently included in the CRoW Act, such as woodlands and watersides.
- A simpler process for National Park authorities to alleviate problems with 4x4 vehicles and encouragement for them to do so. Laws exist to protect rights of way but they are inadequately enforced to avoid unsustainable levels of public money being spent repairing routes that have been damaged by motor vehicles. We believe there should be:
  - Proper enforcement of the law which prohibits the driving of motor vehicles on footpaths, bridleways and restricted byways (with use of criminal proceedings and confiscation of vehicles where appropriate).
  - Timely use of Traffic Regulation Orders (TROs) to prohibit the use of recreational motor vehicles on Byways Open to All Traffic (BOATs) and other unsealed roads, particularly within National Parks and AONBs, and on National Trails, to protect paths from damage, and in the interests of non-motorised users. We support the recommendation of the report from the House of Lords Select Committee on the NERC Act (2006) that the TRO process should be simplified with the aim of securing better value, greater flexibility and applicability in the use of TROs (<https://publications.parliament.uk/pa/ld201719/ldselect/ldnerc/99/9902.htm>).
- The mechanism and process for managing rights of way in National Parks made clearer and more consistent. At present, the responsibilities are sometimes split between the local highway authority and the National Park Authority. However, the level of delegated responsibility is variable. Within the designated landscapes, resources should be given to ensure the quality of public access and engagement with the landscape are consistently high across landscape, which may be managed by several highway authorities.

- National Park authorities given the resources to create strategic walking links in designated landscapes, to help our increasing elderly population keep active.
- Increased resource for National Park authorities to adopt policies in their management plan to ensure that common land is maintained for its original purpose and that unlawful encroachments onto commons that impede public access are appropriately managed (for example ensuring adequate gates in fencing). We would welcome a collaborative approach where the authorities work with owners, commoners and the public to find appropriate solutions.

**13. What views do you have about the way National Park and AONB authorities affect people who live and work in their areas?**

**a) Are they properly supporting them and what could be done differently?**

At the time that National Parks were designated, the new statutory duties and policies which accompanied them were introduced to a pre-existing resident population. Now, in many places, the majority of residents have moved in since the National Park has been in existence, and we consider that the National Park's standards and policies should be widely accepted. However, we recognise some inevitable tensions. Young people may want more entertainment and high house prices mean that local families and young people struggle to find a home without moving away. Our views on provision of low-cost housing are set out in question 14.

We are also aware of pressure for the current duty towards the local community/economy to become a statutory purpose on the same footing as the existing two purposes. Our concerns are:

- That this would conflict with the duties of the relevant local planning authority.
- That it may become seen as the primary purpose of the National Park Authority, to the detriment of the other two statutory purposes, due to local economic and political pressures.

We would therefore strongly object if such a change were proposed and consider that, in this respect, it is vitally important that the lessons of the consultation recently held in Wales should be learned.

The need to support farmers and landowners in their sustainable custodianship of the countryside is clear, and to ensure that subsidies using public money are not contributing to practices that damage habitat and threaten wildlife to further commercial interests. Our protected landscapes should be leading the way in support for farmers to promote environmental enhancement and the connection of people with nature and the countryside.

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

**Coordinated approach to development**

As a nation, we urgently need to find new ways of bringing our economic and environmental decision-making together to ensure that we make sustainable choices and no longer view these as competing goals. The Government's 25 Year Environment Plan champions the natural capital accounting approach. The designated landscapes should be places where we pioneer this thinking in planning decisions. However, we are concerned that this is not currently the case.

We are concerned over recent suggestions that radioactive waste may be disposed of in the protected landscapes, in addition to those already impacted by nuclear facilities. Highways England has also recently proposed a bypass at Arundel on the A27 which would cut through part of the

South Downs National Park and it is not clear how the natural capital cost of this has been accounted for. Although there may be a case for improving road layouts, and such locations may be tightly constrained, options appraisal for developments must take account of the quality of the landscape and national value of the park in a transparent way.

Development should be in character with the unique landscape in which it is set. The current ambitious government house building targets provide an opportunity for the designated landscapes, with adequate resources and support from government, to provide low-cost, well-designed housing in the right locations, which fits with the landscape character and is accompanied by sustainable transport solutions and amenities. The alternative (large scale profit-driven construction) risks significant negative impacts on landscape, the environment and local communities.

### **Sustainable transport**

National Parks and AONBs are not the only areas currently suffering from a decline in public transport. However, recent research from the Campaign for National Parks (National Parks for all: Making car-free travel easier, Campaign for National Parks, 2018) reported that, *“The limited public transport means there is ...a huge reliance on the private car by visitors to National Parks and 93% of visitors...travel by car on average. About 15% of households nationally do not own a car so many of those who might benefit the most from the health and well-being opportunities provided by National Parks are currently excluded from them, due to the lack of public transport”*. It also highlighted that *“Reducing the number of people who travel to National Parks by car would also help reduce the associated impacts of carbon emissions, noise pollution, road danger and the blight and severance caused by high volumes of traffic”*.

The research considered a number of existing sustainable transport schemes in National Parks and made several recommendations, which we support, including the need to make better use of technology and provide easily accessible and up-to-date information as well as the need for a smarter travel pilot project. This would help to make protected landscapes more accessible to visitors and residents alike, and address existing traffic problems in some locations.

Popular areas in the designated landscapes provide an opportunity to test and champion new sustainable transport initiatives. Sustainable and affordable transport is central to being able to manage these landscapes for the future. The sustainable transport facilities needed in a particular designated landscape should be carefully considered and, as far as possible, in keeping with the landscape. Policies should be monitored to ensure they do not have unintended consequences which result in barriers to those lower incomes visiting.

### **We'd like to ask some specific questions about the way National Parks and AONBs work at the moment.**

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

We support the current system of Secretary of State appointed National Park Authority members who bring outside expertise to the management of the National Parks. While we fully support the principles of local democracy, we consider that direct elections for members would result in a narrower range of representation and elected members being subject to the same local political pressures currently experienced by the directly elected Councillors. In our view, this would reduce the ability of the National Park Authorities to manage the parks for the nation as well as their local

population. AONB boards do not currently have the same representation of national interests on their boards and may benefit from a similar inclusion of Secretary of State appointed members.

We support the five principles developed by the Campaign for National Parks (and based on those put forward by the International Union for the Conservation of Nature) for governance of the designated landscapes. These are:

- **Representation:** Participation in governance should, as far as possible, reflect all parts of society. Nominations for National Park membership should be encouraged from a wide range of bodies - for example those representing young people and minority groups – with appointments balanced to ensure that no single interest dominates the membership. Increasing opportunities for under-represented groups to visit National Parks should, over time, encourage greater engagement with their governance. We understand that the Welsh Government has a pilot scheme enabling volunteers interested in taking up governance positions on public boards to shadow a board member for a period of six months. Consideration should be given to replicating such schemes in England.
- **Accountability and transparency:** Decision-making processes should be transparent with effective community engagement at all levels.
- **Performance/Leadership:** As discussed elsewhere in this response, National Parks should lead in integrated landscape management and sustainable planning policy. They should be exemplars of best practice which can be learned from and replicated elsewhere.
- **Consider both local and national needs:** Decision-making in National Parks should aim to further both local and national interests.
- **Value-for-money:** The governance and management of National Parks should be efficient and effective. As noted in our answer to question 9, our view is that National Parks, AONBs and National Trails should be managed in an integrated way, to connect our protected landscapes and form a coherent network.

**16. What views do you have on whether they work collectively at the moment, for instance to share goals, encourage interest and involvement by the public and other organisations?**

There is already collaboration between designated landscapes, for example on the national level specialists in a particular field from within the AONB family are able to act collectively to draft a national approach, and on a regional level National Parks and AONBs work together in Local Nature Partnerships. However, government should facilitate and greater collaboration and partnership working. This would foster greater consistency in approach (where appropriate, allowing for the individual qualities of the landscapes) and in the standards of management of the landscapes.

We welcome the work of National Parks England in facilitating joint working and a unified voice for the National Parks, and the National Association of AONBs similarly, but consider that such joint working should have a stronger statutory basis with leadership from government over shared objectives for all protected landscapes in line with the 25 Year Environment Plan.

**17. What views do you have on their efforts to involve people from all parts of society, to encourage volunteering and improve health and well-being?**

National Parks and AONBs are working hard to attract visitors and facilitate access to their landscapes. In their attempts to diversify their visitor demographic, we consider that they should attract younger visitors through activities that are compatible with conservation of their natural

beauty, wildlife and cultural heritage. They already provide areas of open access land which are used by schemes such as the Duke of Edinburgh Award scheme to build skills of navigation and resilience and teach young people about their environment. Finding other similar ways to connect visitors to the character of the landscape and its special qualities, rather than provide tourism activities which can be found elsewhere, will bring a new generation to the designated landscapes while protecting their special qualities and helping younger visitors appreciate their unique landscapes.

A good example of this was the recent MOSAIC project, run by the Campaign for National Parks (<https://www.cnp.org.uk/sector/mosaic>), which provided a range of volunteering opportunities for 16 to 25 year olds as well as recruiting community champions from black and minority ethnic communities.

There are also good examples of National Park Authorities successfully coordinating volunteer working parties – for example the North York Moors NPA works well with Ramblers volunteers. Ramblers volunteers carry out activities in designated landscapes including path maintenance, route mapping and walk leadership and we are open to exploring whether these roles could be developed further.

It is encouraging that National Parks England and Public Health England agreed an accord in 2017 to work proactively and practically together to secure better public health outcomes which represents their commitment to help people improve their health and wellbeing through interacting with the National Parks.

The government's 25 Year Environment Plan made the case that connection to nature is fundamental to the health and wellbeing of the nation. If the designated landscapes are to be key in delivering this connection, as we believe, they should be better connected (to provide a consistency of approach) and benefit from strong, long-term protection in the planning system. At present, we are concerned that the protections within the NPPF are being undermined by economic considerations (see question 13).

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

Government must commit to funding for all the designated landscapes at a suitable level and over the long term to enable them to make investment and management decisions for sustainable management of the landscape. As well as core financial support, National Parks and AONBs should be able to apply for funding for major works where needed. AONBs receive a portion of their funding from local authorities, which has benefits in terms of alignment and partnership working. However, local authorities have been under such financial strain that this funding is uncertain. Government must ensure that their core funding is secured.

Experience and good practice in attracting additional funding should be shared between National Parks and AONBs. For example, in response to decreased Government funding for public access, the Peak District National Park Authority has created an access fund (started with funding from the NPA but since sustained by donations and sponsorship from other sources) and used this as an opportunity to work in partnership with landowners, walking clubs and others. The fund receives suggestions for improvements and approaches from landowners to solve problems or make improvements. It funds improvements to access land and rights of way, removing stiles and installing gates, agreeing concessionary routes and linking together isolated fragments of access land. The authority is replacing stiles with wicket gates to make access land accessible to more people, including those with restricted mobility. They are also creating linked routes, targeting expenditure to cater for how people want to use access based on existing usage. The authority invests resources in contacting new owners where land changes hands. The Peak District LAF

maintains a 'wish list' of access enhancements so that advantage can be taken of any funding opportunities that arise.

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

The present guidance is not clear on whether new designations would be welcomed and there are instances where one application has been accepted for AONB status whereas approaches concerning very similar type and quality of landscape has not received a positive response.

A more efficient and less resource-intensive process is required. At present it takes many years for proposals to be evaluated and determined. It is important that any new protected landscapes should be supported without reducing the funding and support available to existing National Park Authorities and AONB boards.

**20. What views do you have on whether areas should be given new designations? For instance, the creation of new National Parks or AONBs, or new types of designations for marine areas, urban landscapes or those near built-up areas**

Any new areas aspiring to National Park or AONB status must be of the same level of landscape quality as the existing ones. They would need to demonstrate that they fully meet the same statutory purposes.

We are supportive of plans for a London National Park City. We see this as being a different designation, distinct from the current National Parks and with different objectives. We welcome their work to raise the profile of the environment in cities, and encouraging large numbers of small actions to improve the urban environment.

We are aware that there are small areas of the country which are of very high landscape quality and could potentially meet the statutory purposes of a National Park or AONB but are not of sufficient size to be considered as an independent designated landscape. They therefore have no current protection. There are a large number of habitat and landscape designations, which we consider are already confusing to the general public; however, some mechanism for protecting and enhancing these small areas would be beneficial.

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

Our designated landscapes are cherished and diverse, comparing favourably against their counterparts elsewhere. However, we consider it vital that lessons are taken from the recent Future Landscapes review in Wales. The Marsden report, National Landscapes – Realising their Potential, reviewed the potential of the protected landscapes and recommended three interlocking purposes, which would be worthy of discussion for protected landscapes in England. These were:

1. To conserve and enhance the distinctive landscape and seascape qualities of the area;
2. To promote physical and mental well-being through the enjoyment and understanding of the landscape of the area; and
3. To promote sustainable forms of economic and community development based on the management of natural resources and the cultural heritage of the area.

Unfortunately, the findings of the Marsden report were not accepted by the Welsh Assembly Government, which subsequently commissioned the Future Landscapes report. We did not agree with the findings of the Future Landscapes report, which sought to increase the duty of National Parks to promote economic development. It is important to remember that independent authorities

were established to manage the National Parks for sound reasons and that these authorities were set up to with statutory purposes that have served them well in protecting and enhancing the landscapes in their charge.

The statutory purposes of the National Parks in England should be retained and strengthened. Any duty to enable development should have a lesser status, set in the context of sustainability and preservation of landscape character.

**22. Do you think the terms currently used are the right ones? Would you suggest an alternative title for AONBs, for instance and if so what?**

The consensus amongst our volunteers who have contributed to this evidence and work with AONBs is that their existing name and designation are well understood by the local planning authorities, clearly describe the nature of the landscape, and have a strong brand. We consider that they are much less well known amongst the general public outside the outdoor recreation and conservation communities, so stronger promotion is needed for their individual and collective brand to let people know: why they exist; that they are of equal status to National parks; and how they can visit and enjoy them responsibly.

**23. The review has been asked to consider how designated landscapes work with other designations such as National Trails, Sites of Special Scientific Interest (SSSIs), Special Areas of Conservation (SACs), National Nature Reserves (NNRs) and Special Protected Areas (SPAs). Do you have any thoughts on how these relationships work and whether they could be improved?**

National Trails should be recognised as a protected national asset in the same way as the designated landscapes, with the same level of certainty of core funding. As discussed in question 9 we also consider there to be a valuable opportunity in connecting together National Parks, AONBs and designated habitats using the National Trails and selected other long distance routes, to form a cohesive network for people and wildlife – a ‘wellbeing recovery network’ as well as a ‘nature recovery network’. We would be pleased to be involved in developing this.

National Park Authorities, AONB Boards and Trail Partnerships should have access to the range of expertise necessary to make appropriate decisions for the long-term future of our protected landscapes. These include cultural heritage, landscape, nature conservation, access management and silviculture. Government should encourage and facilitate sharing of expertise and experience between the designated landscapes, but it should also ensure that sufficient numbers of experts are retained to be able to manage the landscapes effectively. Our protected landscapes should be viewed as a cohesive network, offering unparalleled opportunities for wildlife and people.

Given the large number of habitat and landscape designations, it would be helpful to find ways to promote these better to the public, to ensure that everyone understands their basis and their importance to protecting and enhancing the countryside.

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

The government has rightly identified the need for landscape scale resilience to climate change. Collectively, the designated landscapes cover a significant proportion of the country. Government should detail the roles that they should play and provide the necessary guidance, resource and (where necessary) powers to achieve this. It should also be clear on their role in delivering the commitments in the 25 Year Environment Plan and in the post-Brexit agri-environment schemes.

A key part of connecting people to nature through the designated landscapes is people’s understanding of their rights and responsibilities when enjoying these areas. The Ramblers would be

pleased to work with the Government, the National Park authorities and the AONB boards on these messages and to connect more people to nature in our protected landscapes through walking.