

**Response to the Glover Review of Designated Landscapes from Campaign for National Parks  
December 2018**

**Part 1 - Opening thoughts**

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

**Key points in response to this question:**

- **The National Parks are an incredible success story. They remain as important to the nation today as they were when they were originally conceived**
- **The role of the National Park Authorities is essential in terms of maintaining and enhancing the special qualities of the Parks**
- **The National Park purposes and the socio-economic duty, underpinned by the Sandford Principle, have stood the test of time. They enable the National Park Authorities sufficient flexibility to protect and enhance the Parks while also working to support the rural communities living within the areas. There would be benefit, however, in a new ambitious vision for the Parks, which clearly connects them to the achievement of the 25 Year Environment Plan.**
- **The National Park Authorities being local planning authorities, with responsibility for both plan-making and planning decisions in their area, is a successful part of the current system and remains critically important to the protection and enhancement of the Parks and the communities that live within them.**

90% of people say National Parks are important to them (National Parks England (2018) National Parks, National Assets) which illustrates that the National Parks are an incredible success story. They are among the most beautiful and valued landscapes in the British Isles, containing some of our most breath-taking scenery, rare wildlife and cultural heritage. There are 94 million visitors to National Parks and their surrounding areas each year eager to enjoy their unique qualities, peace and tranquillity. They are also home to rural communities and their popularity means these areas make an important contribution to the rural economy – it is estimated that visitors spend more than £5bn a year and support 75,000 jobs (full time equivalent).

While 2019 will be the 70<sup>th</sup> anniversary of the legislation that created the Parks, they remain as important to the nation today as they were when they were originally conceived. They provide an escape from the stresses of everyday life and opportunities for people to re-connect with the natural environment.

The National Park Authorities are essential in terms of maintaining and enhancing the special qualities of the Parks. Their role enables them to take a landscape scale approach to managing the Parks and the wide range of public benefits and natural assets within them.

The wording of the purposes and socio-economic duty, underpinned by the Sandford Principle, have stood the test of time and should be retained as they are. They enable the National Park Authorities sufficient

flexibility to protect and enhance the Parks while also working to support the rural communities living within the areas. The National Parks, with their current purposes and socio-economic duty, should and will have an important role in supporting the achievement of the Government's 25 Year Environment Plan. The Parks would, however, benefit from a new ambitious vision for them that clearly connects the Parks and their purposes to the achievement of the Plan.

The National Park Authorities being local planning authorities, with responsibility for both plan-making and planning decisions in their area, is a successful part of the current system and remains critically important to the protection and enhancement of the Parks and the communities that live within them. This is demonstrated by the findings of several previous independent reviews (dating back to the Edwards Report in 1991), which found that having a separate authority is the most effective way of managing planning in National Parks. In addition, research by Land Use Consultants for the Welsh Government<sup>1</sup> demonstrated the importance of planning to the boundary of National Parks, as opposed to planning within AONBs which is to local authority boundaries, in order to achieve the statutory purposes. This is because the National Park Authorities are able to adopt a consistent approach across the whole of the National Park area regardless of local authority boundaries resulting in a clearer focus on the National Park purposes and better alignment between the Local Plan and the National Park management plan.

There is also a lot of expertise within the National Park Authorities and we believe it is working well where the Authorities are now looking beyond their boundaries and working closely with neighbouring Parks and AONBs.

As a general, overarching comment, we also wanted to highlight that our responses to the questions distinguish between the role of National Parks i.e. the designated areas and the role of National Park Authorities (NPAs) i.e. the governing bodies for these areas.

1. Welsh Government (2012) *Delivery of Planning Services in Statutory Designated Landscapes in Wales*  
<http://wales.gov.uk/topics/planning/planningresearch/publishedresearch/statutorylandscapes/?lang=en>

*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.*

**Key recommendations in response to this question:**

- **Stronger protections for the National Parks are needed to prevent inappropriate development that undermines their special qualities. This should include a strengthened section 62 duty and improved national and local governance of the authorities.**
- **There must be more cohesion and a more integrated approach across Government departments towards the National Parks and the policies that affect them.**
- **All relevant organisations that are involved in the development of the National Park management plans should be required to produce statements setting out how they will fulfil the new stronger section 62 duty.**
- **There must be a strong, clear relationship between improved, ambitious management plans, and the priorities for environmental land management within the Parks. This should include the Park**

**Authorities having responsibility for delivering Environmental Land Management schemes, which would help the delivery of both of the National Park purposes.**

- **The Park Authorities must better integrate and align land use and natural resource planning.**
- **The Parks were originally created for the nation. More needs to be done to make sure that everyone can access, enjoy and benefit from the Parks. More support for sustainable travel is needed to ensure that more people can visit without placing increased pressure on the environment and local communities in these areas. It is also important that people from all parts of society are encouraged to visit the Parks.**
- **A new suite of environmental outcomes should be developed for the designated landscape family to better reflect their purposes and link them to the 25 Year Environment Plan. Progress against the suite of outcomes should be monitored on an annual basis and be made publicly available.**

Our National Parks are beautiful, inspiring places but we recognise that they can be even better.

There is a need for stronger protections for the National Parks to prevent inappropriate development that undermines their special qualities. We have welcomed the positive language used by Defra Ministers and within the 25 Year Environment Plan but these warm words are not always being reflected in decisions made at both the local level and at the national level, albeit by different government departments. For example, the Department for Business, Energy and Industrial Strategy (BEIS) chose a version of the draft National Policy Statement for Geological Disposal Infrastructure which includes designated landscapes as potential locations for new nuclear waste storage facilities even though there is evidence that excluding these areas would deliver benefits to the environment and establish clearer parameters for decision-making.

To ensure greater cross government support for the designated landscapes, we believe there is a need for a body with a clear remit to champion the family of designated landscapes at the national level but also provide oversight across all of the areas at the local level. We set out in more detail how this could be achieved under Q16.

The existing section 62 duty must be strengthened. This should be achieved by replacing the 'have regard to' with 'have a duty to further National Park purposes' because the current wording is insufficient. A duty to 'have regard' is the weakest form of duty that can be imposed as it requires only that there must be some consideration of the National Park purposes, not that any weight needs to be given to those purposes. Given the importance of National Parks to the nation, it is unacceptable that there is such a weak duty in this case. It is also inconsistent with the National Planning Policy Framework (NPPF) which requires that '[g]reat weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to these issues ...' (para. 172 of the revised 2018 NPPF).

This issue was also addressed as part of the Marsden Review of Designated Landscapes in Wales<sup>2</sup> which recommended amending the wording of the duty to 'to contribute to the delivery of the purposes' (recommendation 8). An alternative would be to adopt something similar to the duty in s6 of the *Environment (Wales) Act 2016* which requires that 'a public authority must seek to maintain and enhance biodiversity in the exercise of its functions ... and in so doing promote the resilience of ecosystems, so far as

consistent with those functions.’ An equivalent with regard to National Park purposes could be ‘a duty to further national park purposes.’

All relevant organisations that are involved in the development of National Park management plans should then be required to produce statements setting out how they will fulfil this new stronger duty. These statements should be included in the management plans. This will ensure that relevant organisations give greater priority to delivering the purposes as they will need to be very clear about the processes and systems they have in place for ensuring they are meeting these duties. Including the statements in Management Plans will also mean that they are publicly available and make it easier for National Park Authorities, National Park Societies and other partners to hold relevant organisations to account.

We also ask the review to address the urgent need to strengthen the relationship between improved, ambitious management plans, environmental land management strategy and the priorities for future environmental land management schemes within the Parks. By this we mean that management plans should set out a positive, ambitious framework for enhancing the Parks. This includes targets for protecting and enhancing a range of public goods and natural capital including landscape, wildlife, cultural heritage, access and water and air quality. These priorities should then be the priorities for any future environmental land management scheme, and National Park Authorities should have responsibility for the development of future agreements or contracts with farmers and land managers.

At the moment we recognise that the Park Authorities do not have all of the levers and funding they need to implement their management plans. Ensuring that in future they are responsible for delivering environmental land management schemes has the potential to achieve important changes on the ground. This would enable the Authorities to ensure that specific agreements are clearly informed by, and working towards the delivery of, National Park management plans.

The role of National Park Authorities to enable positive change could also be further strengthened by them better integrating and aligning land use and natural resource planning. One of the key mechanisms for delivering the priorities in the management plan is the Local Plan and most Park Authorities now make clear links between the two. Several include a common vision in both documents and some, such as Exmoor, even have a shared set of objectives. There is an opportunity to build on these existing partnerships and arrangements to ensure that there is an even more integrated approach to planning and management in all the Parks.

We also believe more needs to be done to make sure that the Parks are accessible to all. The Parks were originally created for the nation, and work needs to be undertaken to make sure that everyone can access, enjoy and benefit from the Parks. In particular, it is essential that there is more support for sustainable travel to ensure that more people can visit without placing increased pressure on the environment and local communities in these areas. We make more specific recommendations about how to achieve this in our answer to Q14. It is also important that people from all parts of society are encouraged to visit the Parks and our answer to Q17 discusses ways of supporting visits by those currently under-represented among visitors.

There is a need for a new suite of environmental outcomes for the designated landscape family that better reflect their purposes and link them to the 25 Year Environment Plan. This should include metrics for monitoring changes in landscape quality, whether the areas are helping to achieve bigger, better and more joined up habitats and information about the diversity of visitors. Progress against the suite of outcomes should be monitored on an annual basis and be made publicly available.

2. <https://gov.wales/docs/desh/publications/151020-review-designated-landscapes-report-en.pdf>

## Part 2 - Views

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

### Key recommendations in response to this question:

- **While there are many positive conservation projects that are working to improve habitats and support species, these need to be significantly scaled up and the National Park Authorities must work with partners, but also provide greater leadership, to achieve this.**
- **The family of designated landscapes must respond to the challenge of climate change both individually and collectively. In light of the area of the country the designations cover, they have an important role in supporting ecosystem resilience and adaptation.**

The National Parks are important for wildlife and Campaign for National Parks sees this as a critical part of their natural beauty. 56% of the New Forest National Park is designated of international value for nature conservation<sup>3</sup>. Over a third of the Peak District is covered by protections for nature conservation<sup>4</sup> and in September 2017, it was reported that a rare plant, previously thought to be globally extinct, had been rediscovered in the Peak District National Park. Two small populations of the leek-coloured hawkweed, 62 plants in total, were found flowering on the banks of the Monsal Trail, in Chee Dale. This is the only known location in the world that the plant is found<sup>5</sup>.

As extensive tracts of land, the Parks also have a role in achieving the UK's global obligations in relation to nature. As the ranges of different species change due to climate change, the designated landscape family's role in relation to supporting wildlife will become even more important.

We are aware of many positive, nature focused projects within the Parks. The Two Moors Threatened Butterfly project, for example, which is run by Butterfly Conservation in partnership with a number of organisations and landowners, focused on reversing declines in marsh fritillary, the high brown fritillary and the heath fritillary across Dartmoor and Exmoor. It ran from 2005 to 2016. Populations of the marsh fritillary declined substantially in the UK with 66% of colonies being lost between 1990 and 2000. The butterfly is typically associated with extensive grazing by cattle and ponies, so the project worked with land managers to implement favourable management options through agri-environment schemes. Between 2005 and 2016 population trends saw an increase of over 700% based on larval webs<sup>6</sup>.

Projects are also in place in a number of Parks to monitor and support the recovery of pine marten populations. Pine martens are Britain's second rarest carnivore, after the wildcat, after populations declined dramatically during the 19<sup>th</sup> century. A project that is part of the Back from the Brink programme, also focuses on pine martens in northern England. In August 2017, a pine marten was caught on camera in the North York Moors after a four-year project<sup>7</sup>. Pine martens were previously last seen alive in Yorkshire about 35 years ago. In March 2018, video footage also showed that pine martens had returned to the forests of Northumberland<sup>8</sup>.

Other important examples of landscape scale projects that recognise the importance of habitat restoration include the long-running Moors for the Future partnership. The focus of the Moors for the Future partnership stretches from Nidderdale in Yorkshire in the north, down to Kinder Scout in the Peak District National Park and has been running for 15 years. The project works to reverse the damage that has taken place over the last 200 years and resulted in large areas of the uplands in this area bare of vegetation. The aim of the project is to return the moorland areas to their former glory and to enable them to flourish<sup>9</sup>.

3. Accessed 16 May 2018 - <http://www.newforestnpa.gov.uk/conservation/landscape-partnership/scheme-management/background-to-scheme/>
4. Peak District National Park Authority (2018) Peak District National Park Management Plan 2018 – 23
5. Accessed 16 May 2018 - <https://www.derbyshirewildlifetrust.org.uk/news/2017/09/06/extinct-plant-rediscovered-peak-district-national-park>
6. Accessed on 16 May 2018 - <https://butterfly-conservation.org/4497/The-TwoMoorsThreatenedButterflyProject.html>
7. Accessed on 16 May 2018 - <https://www.theguardian.com/world/2017/aug/07/rare-pine-marten-caught-on-camera-in-yorkshire-for-first-time-in-35-years>
8. Accessed on 16 May 2018 - <https://www.pine-marten-recovery-project.org.uk/news/rare-pine-marten-captured-on-camera-in-northumberland>
9. See <http://www.moorsforthefuture.org.uk/> for further information (accessed 12 June 2018)

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

**Key recommendations in response to this question:**

- **The network of National Parks and AONBs must take a leading role to improve the state of nature. This includes the family of designated landscapes being an important part of the Nature Recovery Network.**
- **Links between the Park management plans and priorities for future environmental land management and the recovery of nature, including healthy ecosystems, need to be strengthened. This should include, but not be limited to, the Park Authorities having responsibility for the delivery of Environmental Land Management schemes in the Parks. The priorities for the enhancement of nature that are set out in management plans should then be clearly reflected in specific agreements to enable real improvements on the ground.**
- **Our report, *Raising the bar: improving nature in our National Parks*, makes seven specific recommendations about how more could be done within the Parks to support the recovery of our natural habitats.**

While we know good practice and important projects are working to enhance the natural environment within the Parks, we know that trends in biodiversity across the UK continue to show declines. It is also important to be aware that the continued international recognition of our National Parks as protected areas by the International Union for Conservation of Nature (IUCN) is dependent on primacy being given to conservation, and specifically nature conservation. While the retention of the Sandford Principle is an important part of the policy mechanism for achieving that in decision making, more could and should be done in practice to reflect the importance of nature conservation within the Parks. The network of National Parks should be looking to take a leading role to improve the state of nature, including through the Nature Recovery Network set out in the 25 Year Environment Plan.

As set out in our report, *Raising the bar: improving nature in our National Parks*<sup>10</sup>, data from Natural England highlights that a lower percentage of SSSIs are in favourable condition (25.3%) than the national average (38.5%). While we recognise a higher than average percentage of SSSIs in the Parks is considered to be ‘unfavourable recovering’, this can simply mean the land is currently covered by an agri-environment scheme rather than Natural England being confident the condition of the biodiversity at site is genuinely recovering.

We recognise there are different challenges, threats, barriers and opportunities across the National Parks. As set out in our response to Q8, there is a need for a stronger link between the Park management plans and priorities for environmental land management, including through the Authorities having responsibility for delivering future Environmental Land Management schemes. The priorities set out in management plans then need to be clearly reflected in specific agreements if change is to be achieved on the ground.

As set out in our *Raising the bar* report, there is a need for the National Park Authorities to demonstrate more leadership and ambition on enhancing nature within their Park. One means of doing this will be through management plans, which should include specific goals and targets for habitat improvement and/or creation and species population recovery. Plans should also include a spatial representation that sets out which policies are a priority for different areas of the Parks. This should include opportunities for expanding and linking up fragmented habitats, including, but not limited to, woodland, supporting natural processes to flourish and enhancing natural capital and, where relevant, the removal of invasive or inappropriately located species.

Opportunities to support reintroduction programmes should also be identified and where illegal persecution of raptors is an issue, this should be included as a clear priority for action.

We also believe that National Park Authorities should identify an area, or areas, within which they will implement policies to make the areas feel relatively wilder. This will include working with landowners and managers, so land is managed less intensively and natural processes support more robust, functional ecosystems. Links should also be made to local plan policies so intrusion from light and noise pollution can be minimised. Wildlife should be monitored within these areas and a 'control' area established outside of the area to understand the impact of the change in management.

The extent to which the area(s) will feel 'wild' will vary from Park to Park but within each Park, all of which are extensive tracts of land, areas that are managed more extensively should be identified. This should be supported by funding through future environmental land management policy.

We believe Natural England should work with the National Parks to trial a new approach to conservation that focuses on the re-establishment of natural ecosystems and enhancing natural capital. The outcomes for wildlife and people should be monitored closely to inform future approaches to nature conservation.

More also needs to be done to tackle the illegal persecution of raptors. We recognise this is not solely an issue in designated landscapes, but a high proportion of raptors go missing in and around our Parks and AONBs. To better protect birds of prey, and wildlife more widely, and restore the ecological integrity and vitality of our blanket peatlands and upland dwarf shrub heaths, the Government should introduce a system of licensing of driven grouse shooting. This should also be accompanied by the use of vicarious liability to uphold accountability within any new regulatory system.

10. Campaign for National Parks (2018) *Raising the bar: improving nature in our National Parks*  
<https://www.cnp.org.uk/sites/default/files/uploadsfiles/Raising%20the%20bar%20improving%20wildlife%20in%20our%20National%20Parks.pdf>

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

**Key recommendations in response to this question:**

- **The key locally distinctive and important landscape and cultural heritage features in each National Park should be identified in management plans, along with how they will be conserved**

and enhanced. Decision makers must give equal weight to protecting and enhancing landscape, beauty and cultural heritage as is given to nature conservation and enhancement, while still allowing these areas to evolve and change over time.

- **It is essential that National Park Authorities remain as local planning authorities and retain and strengthen their role in providing specialist advice on cultural heritage and landscape. Other relevant bodies such as the Planning Inspectorate and National Infrastructure Commission should also have access to such advice.**
- **Management plan and Local Plan policies, as well as decisions on planning applications, should be informed by Landscape Character Assessments. Such Assessments should also inform targeted action through projects on the ground.**
- **There should be continued support from the Heritage Lottery Fund for landscape-scale projects in National Parks.**

National Parks are living, working landscapes shaped by centuries of social, economic and environmental change and the cultural heritage is an integral part of the landscape character and beauty of these areas. Distinctive built features such as the stone field barns in the Yorkshire Dales are as much a part of the landscape as the natural features. The special qualities of each of the Parks are an important means of articulating what makes each Park beautiful and unique.

For most of human history, change has happened gradually allowing the landscape to evolve and adapt over long periods of time but in recent decades there has been increased pressure for more rapid and extreme changes, in the form of major infrastructure or insensitive conversions of existing buildings. At the same time, changes in land management have led to the abandonment and neglect of buildings and structures which are no longer considered suited to modern requirements. Both the ongoing decline and deterioration of such structures and damaging and inappropriate new development are significant threats to the special qualities of National Parks.

The key locally distinctive and important landscape and cultural heritage features in each National Park should be identified in management plans, along with how they will be conserved and enhanced. Decision makers must give equal weight to protecting and enhancing landscape, beauty and cultural heritage as is given to nature conservation and enhancement, while still allowing these areas to evolve and change over time.

Whilst it is the National Parks themselves that provide these high quality landscapes, it is the work of the National Park Authorities that ensures that these landscapes are maintained and enhanced so that they can continue to provide a range of natural capital services. As set out in our answer to Q7 above, it is essential that Park Authorities remain as local planning authorities with responsibility for both plan-making and planning decisions in their area because this is one crucial means they have for influencing landscape quality and character. The specialist heritage advice that the National Park Authorities offer is also very important and it is essential that they are able to retain and strengthen this role including through the employment of specialists such as listed buildings officers and archaeologists. Bodies such as the National Infrastructure Commission and the Planning Inspectorate should also have access to the appropriate expertise on landscape and cultural heritage.



Another means should be through strengthening the link between management plans and a future environmental land management scheme (see Q8). This would enable public money, through farming and land management, to support landscape enhancement, natural beauty and the protection and enhancement of our cultural heritage.

Policies within management plans and local plans should be informed by Landscape Character Assessments (LCAs). Such assessments enable a better understanding of the landscape character in a particular area as well as its special qualities and the changes that are needed to enhance the landscape. It is essential that such work also leads to targeted action through projects on the ground and is reflected in planning decisions.

National Parks have benefitted significantly from the Heritage Lottery Fund (HLF) for a variety of landscape and cultural projects and National Park Authorities are ideally placed to lead landscape-scale heritage and nature conservation projects. Given the decline in other sources of funding for such work, it is essential that HLF priorities allow for the funding of other similar projects in future. There are currently almost no public resources available for the conservation of cultural heritage features such as the stone barns and walls in the Yorkshire Dales even where these have been identified as being at risk and have been designated as Conservation Areas and are thus considered to be of national heritage importance. Consideration should also be given to Historic England's role in this and whether there is a need for the organisation to make a bigger contribution in National Parks. A strengthened S62 duty would assist with this.

*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?*

**Key recommendations in response to this question:**

- **The relationship between improved, ambitious management plans, and the priorities for future environmental land management schemes within the Parks should be strengthened.**
- **This should include the Park Authorities taking on responsibility for delivering the future Environmental Land Management scheme. Locally tailored priorities should be agreed, within a national framework, which enables the Authorities to develop agreements with land owners that will support the delivery of ambitious management plans.**
- **The Park Authorities should also have a clear role in advocating high nature value farming practices.**

Centuries of management have produced the beautiful and inspiring landscapes, the wildlife-rich habitats and cultural heritage within our National Parks. The Dower report saw farming as central to the special qualities of those areas. One of Dower's four founding principles was that 'established agriculture should effectively be maintained' and he recognised that farming in the hills required special assistance in terms of capital improvements and income support. He saw little conflict between farming in the 1940s and the distinctive characteristics of the soon to be designated National Parks.

There have been significant changes in farming practices and society since Dower's report was published. Farming has become more mechanised and often more intensive; the use of fertiliser and chemicals more widespread; summer haymaking has been replaced by earlier cuts for silage and haylage; farms have become larger and more specialised; and small farms have become uneconomic but ever more attractive assets for non-farming purchasers.

Campaign for National Parks recognises the role of farmers and land managers and their important part in helping us deliver our vision for even better National Parks. We do not, however, claim that the management of the land within the Parks has always been exemplary.

Landowners and managers will play a central role in improving and maintaining our National Parks and they already have a pivotal role in rural communities. In light of our desire for the National Parks to be enhanced and to deliver even more public benefits, we welcome the current proposals to move to a policy of paying public money for the delivery of public goods. The National Park Authorities should take on responsibility for delivering the future Environmental Land Management scheme in order to maximise the public benefits from them within the Parks.

The National Park Authorities currently have different approaches in relation to how they work with farmers. Some positive examples include the Yorkshire Dales National Park Authority is currently working very closely with farmers as part of an outcomes-based pilot project. We understand the Park Authority also has delegated responsibility and funding from Natural England to deliver catchment sensitive farming advice.

The South Downs National Park has six farm clusters within its areas. They range in size from just under 5,000ha to over 30,000ha and have between 10 and 40 members. Each group has a number of targets and objectives relevant to their local landscape, and a series of projects that help to deliver them and while they work closely with the Park Authority and other expert partners, these groups are not run by the Authority. Since the formation of the groups and clusters there has been a big increase in coordinated landscape scale projects.

As set out in our response to Q8, there is an opportunity to strengthen the relationship between improved, ambitious management plans, and the priorities for future environmental land management within the Parks. The priorities in management plans should also be the priorities for locally tailored environmental land management schemes, and National Park Authorities should lead the delivery of the Environmental Land Management scheme in their area. This should ensure future agreements or contracts with farmers and land managers support the delivery of the priorities in the management plan. The Authorities should also be strong advocates and a source of advice about high nature value farming.

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

**Key recommendations in response to this question:**

- **National Park Authorities should be provided with the appropriate powers and resources to enable them to maintain and enhance the public rights of way network in their area and manage the negative impacts of recreation.**
- **The Sandford Principle must be retained and must be implemented effectively. The Government should back this up by sending out a strong message about the type of development that is appropriate in National Parks and make it clear that priority should always be given to the conservation purpose.**

As one of the statutory purposes of National Parks is to promote opportunities for the public understanding and enjoyment of their special qualities, National Park Authorities already play a key role in encouraging appropriate outdoor recreation and increasing understanding of the environment.

The Ramblers' Big Pathwatch report<sup>11</sup> shows that the rights of way network is generally in a better condition in National Parks than in other areas. 69% of the network in National Parks was reported as being well-kept and signposted, compared with an average of 56% across all the surveyed areas. National Park Authorities should be provided with the appropriate powers and resources to enable them to maintain and enhance the public rights of way network in their area.

We recognise that the Park Authorities also have a role in managing negative impacts of recreation, including the consequences of their popularity. This includes maintaining and repairing footpaths, managing high levels of litter and implementing Traffic Regulation Orders to prevent vehicles from using Byways Open to All Traffic where the level of use is damaging the route. We are aware that the inappropriate use of off-road vehicles is a particular problem in some National Parks so consideration should be given to allowing National Park Authorities to ban off-roading entirely.

It is sometimes argued that there is a need to offer a wider range of activities in order to attract more people into the Parks. There are many excellent examples of high quality development which furthers both of the National Park purposes such as the redevelopment of the YMCA Lakeside at Windermere in the Lake District and the new Cycle Hub in the North York Moors. However, the second purpose has sometimes been used to justify inappropriate and damaging recreational proposals, such as the zip wires at Thirlmere in the Lake District which we, in partnership with Friends of the Lake District and others, successfully campaigned against earlier this year. Such proposals fail to take account of the need to ensure that any changes are compatible with the first purpose and overlook the actual wording of the second purpose, which focuses on promoting opportunities for the public understanding and enjoyment of the special qualities of the Parks.

It is essential to ensure that the Parks continue to be protected from recreational proposals which threaten their tranquillity, wildlife, landscape and natural beauty. An important element of this protection is the long-established Sandford Principle which requires that the conservation purpose must have precedence where there is a conflict between the two purposes. The Sandford Principle must be retained and must be implemented effectively. The Government should back this up by sending out a strong message about the type of development that is appropriate in National Parks and make it clear that priority should always be given to the conservation purpose.

Previously many of the National Park Authorities worked with Campaign for National Parks' Mosaic project<sup>12</sup> to support groups currently under-represented to visit and enjoy the National Parks. With the right enabling mechanisms and support available, the National Parks offer lots of opportunities for other similar initiatives in future to ensure that under-represented groups of people, especially from disadvantaged and urban communities, can gain greater access to, and understanding of, the natural environment and the benefits this can bring. We discuss this further in response to Q17.

11. <https://www.ramblers.org.uk/get-involved/pathwatch/the-state-of-our-paths-report.aspx>

12. <https://www.cnp.org.uk/sector/mosaic>

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

**Key recommendations in response to this question:**

- **While National Park Authorities have planning powers, their constituent authorities have other socio-economic functions. This means the Park Authorities can only do so much on their own.**

- **There is a need for the constituent authorities to work closely and constructively with the Park Authorities to support the people who live and work in the Parks.**

The Parks, and the communities within them, face challenges due to a lack of development and loss of rural services and community facilities, including post offices, buses and schools<sup>13</sup>. The populations within the Parks are also more elderly than national averages for England<sup>14</sup>; this presents challenges in terms of the provision of services.

Another major challenge is also access to affordable homes, an issue exacerbated by the proportion of homes in many Parks that are owned as second homes or holiday lets.

As we set out in our answer to Q14 in relation to housing the Park Authorities do use policies within their local plans to support the delivery of affordable housing that meets local needs. We know there is a concern expressed by some that nothing can get planning permission within the National Parks but it is important to distinguish people's perceptions of the planning system from the reality. The Government's live tables on planning applications show that the vast majority of planning applications in National Parks receive permission. For the year to June 2017 (the most recent statistics available) National Park Authorities granted approval for 90% of the planning applications they received compared to 88% for all English planning authorities (Live table P122<sup>15</sup>). We know that this high percentage is due to National Park Authorities taking a proactive approach to planning and working with applicants to inform, and where necessary improve, applications before they are submitted.

While National Park Authorities do have planning powers their constituent authorities have other socio-economic functions. This means the Park Authorities can only do so much on their own. Often tackling issues such as the loss of rural services will require innovative, community led solutions such as the establishment of community shops and hubs. These can be enabled and supported by the Authorities, but the challenge is for these services to become self-sustaining. Solutions will also require close partnership working with the socio-economic activities of their constituent authorities.

13. National Housing Federation (2017) *Affordable housing saving rural services*

14. Office for National Statistics (2017) *Small area population estimates in England and Wales: mid 2016*

15. <https://www.gov.uk/government/statistical-data-sets/live-tables-on-planning-application-statistic>

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

**Key recommendations:**

- **Changes are needed at a national level to enable the National Park Authorities to support local communities. These include introducing a national requirement for additional council tax to be paid on second homes and by ensuring that an appropriate level of taxation is being paid on properties registered as holiday lets. And the introduction of the requirement for planning consent for a change of use for second homes and holiday lets.**
- **There is a need for closer alignment between local plans and management plans, and a strengthened section 62 duty, to help achieve more meaningful partnership working between the Park Authorities and their constituent local authorities.**

Supporting communities and how the Authority undertakes the delivery of its socio-economic duty is an important part of management plans. The emerging Yorkshire Dales management plan includes community themes around housing, population and services and farming. While they are very aware of these issues, they do not have the tools to address them themselves. For example, 22% of houses in the Yorkshire Dales National Park are either second homes or holiday lets. But they want to attract younger people and families into the area.

We understand from the Authority that the planning permissions they have granted are close to a 10 year high, while completions are at a 10 year low. They have also tried to consider how to tackle the issue of second homes in the area, by developing proposals to significantly increase council tax on second homes. This proposal had to be abandoned earlier this year, however, when it failed to gain the support of the constituent local authorities involved<sup>16</sup>.

There are limited options for the National Park Authorities to address this issue without changes at a national level, for example, by introducing a national requirement for additional council tax to be paid on second homes and by businesses that operate multiple holiday lets. Another suggestion that has been proposed<sup>17</sup> is the requirement for planning consent for a change of use for second homes in recognition that such properties have a very different impact on local communities than the same property being used as a permanent home. Again, this should also be considered for holiday lets as a means of the Park Authorities being able to more closely manage the availability of housing within the Parks.

More generally, as noted in our answer to Q13, at the moment partnership working between the Park Authority and the consistent authorities is essential to tackle some of the socio-economic challenges faced by rural communities. As the Land Use Consultants report for Welsh Government notes, 'it is very important that this partnership working is not purely perfunctory but is based on a common understanding, mutual respect and a desire to find common ground, with solutions that help support the businesses and communities of the statutory designated landscapes while meeting their statutory purposes'. Closer alignment between local plans and management plans, and a strengthened section 62 duty, would help achieve this more meaningful partnership working.

16. <https://www.bbc.co.uk/news/uk-england-york-north-yorkshire-43227974>

17. <https://greens.scot/sites/default/files/Empty%20and%20Second%20Homes%20report.pdf>

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

**Key recommendations in response to this question:**

- **National Park Authorities must be able to continue using planning policies which ensure the delivery of affordable housing and support the most appropriate form of housing for their area.**
- **There is a need to look in detail at how more well-designed, sustainable, affordable housing can be delivered to meet local needs in National Parks and to address the issue of second homes, which is a significant barrier to the development of thriving, sustainable communities in many parts of the Parks.**
- **There is an urgent need for more support for measures to provide car-free access to and around National Parks to ensure that more people can visit without placing increased pressure on the**

**environment and local communities in these areas, but also so that everyone can access the Parks, regardless of whether or not they have access to a private car.**

- **Road pricing should be trialled in National Parks as part of a wider pilot which would also test new types of on-demand shared transport services and the development of sustainable travel hubs, providing more options for car-free travel for visitors.**

The Park Authorities are planning authorities and can use their planning policies to influence travel patterns and the opportunities for delivering new housing. They do not, however, have direct responsibility for building houses or planning and delivering transport within their areas.

### **Housing**

The high quality environment in National Parks makes them attractive places to live. Based on 2011 Census data we know all the National Parks have an increasingly ageing population, indicating that they are seen as particularly attractive places to relocate for those who are retired. We also know that second home ownership is an issue in National Parks. Consequently, average house prices in National Parks are already significantly higher than the average house price in their respective region. The premium for a property in a National Park varies from 27% to 90% but in five of the 10 National Parks it is over 60%<sup>18</sup>.

If National Parks are to thrive in the future, it is essential that a wide range of people are able to live and work in these areas. New housing must be carefully planned to ensure that it meets the needs of local people, is of high quality design and does not detract from the landscape character of the area. Such housing is likely to be more acceptable to local communities as well as helping to protect and enhance the special qualities of the National Parks.

National Park Authorities have a strong track record of supporting the delivery of housing which makes it easier for local people to work and live in areas which would otherwise be unaffordable. Many new housing developments in National Parks have been carefully designed to fit into sensitive surroundings while meeting the needs of local communities. Examples include the Broadgate development<sup>19</sup> in Grasmere, Lake District, a 15-home development of a mix of housing types and tenure built using locally sourced slate roof tiles and natural Lakeland stone; and the award-winning Stafford Close Housing Scheme<sup>20</sup> in Christow, Dartmoor National Park, a development of 18 energy efficient 'Passivhaus' dwellings, including 14 provided for affordable rented housing by local people and four which were sold to local people at reduced market value. In the New Forest, the Park Authority has even funded the building of, and is the landlord for, two affordable homes at Bransgore<sup>21</sup> that are now let to local families. In addition, a number of Parks, including Dartmoor, have now set up Community Land Trusts to assist in the delivery of affordable housing.

National Park Authorities' current approach to housing delivery, as set out in Local Plans, ensures that the limited development opportunities available cater for local needs rather than meet the high demand for market housing. It is important that National Park Authorities are able to continue using planning policies which ensure the delivery of affordable housing and support the most appropriate form of housing for their area.

Despite the successful examples available, there are still serious problems with the delivery of new housing in some National Parks, particularly affordable and/or local occupancy housing. Even when National Park Authorities have appropriate policies in place, they cannot always rely on developers bringing forward sufficient sites or implementing planning permissions once granted. There is a need to consider what more central government could be doing to support the delivery of housing which supports the needs of local people in National Parks.

As set out in our answer to Q13a, this review is an opportunity to explore how more well-designed, sustainable, affordable housing can be delivered to meet local needs in National Parks and to address the issue of second homes, which is a significant barrier to the development of thriving, sustainable communities in many parts of the Parks.

### **Transport**

There are many different aspects of transport that could be considered in response to this question but we have focused on the issue of visitor travel as it is clear that NPAs should have a role in this given its contribution to their second purpose. There is an urgent need for more support for measures to provide car-free access to and around National Parks to ensure that more people can visit without placing increased pressure on the environment and local communities in these areas. There is evidence from the Mosaic project and other research that the cost and availability of public transport can be a significant barrier to visiting National Parks for those without cars. We published a report, *National Parks for all: making car-free travel easier*<sup>22</sup>, earlier this year which examined existing and current sustainable transport initiatives, and sets out recommendations about how to improve the options for travelling to and around National Parks more sustainably. This report examined a wide range of potential improvements including ensuring that bus and train services are better co-ordinated and the use of services such as shared taxis in addition to traditional bus services.

There are some interesting examples of innovative transport schemes which could be rolled out to meet the needs of visitors in all National Parks if the right support was available. These include Vamooz<sup>23</sup> in the Yorkshire Dales which allows on-demand shared journeys to be booked via an app and Bwcabus<sup>24</sup> which operates in parts of Wales, including Pembrokeshire, and combines fixed route scheduled bus services with flexible, bookable on-demand connecting routes. However, even successful examples such as Bwcabus often require some level of subsidy given the nature of the areas they serve and many face an uncertain future due to the reduced level of funding available for local buses following cuts to local authority bus services.

The review should, therefore, consider new ways of funding accessible, affordable and sustainable transport options. In addition, there are some places in National Parks where high levels of car use are so damaging to the environment that it may be appropriate to consider measures to restrict car use. We believe there is considerable potential to experiment with approaches such as road pricing in National Parks as they might be more acceptable to people if presented as a way of demonstrating their willingness to protect these areas and if the money raised was being used to help fund alternatives to the car.

In 2005, the Peak District NPA applied unsuccessfully for funding to test a road user charging scheme for visitors. However, the situation has changed considerably since then due to the growing numbers of visitors and the increasing awareness of the negative impacts of high levels of car use so the time is now right to test the introduction of road pricing in National Parks. In addition, there needs to be more support and encouragement for National Park Authorities to use parking charges as a means of discouraging car use as this has been used successfully already in some National Parks. For example, the North York Moors National Park Authority introduced a flat charge with non-interchangeable tickets to discourage 'grazing' between locations and thus encourage longer stays and more use of bus, cycling and walking.

We would like to see road pricing introduced as part of the 'smarter travel National Park' pilot which we recommended in our car-free travel report. This would test new types of on-demand shared transport services such as Vamooz or Bwcabus together with the use of travel demand management measures, such as road pricing. It would also support the development of sustainable travel hubs – key centres within the Parks offering a range of activities within one location and good car-free access to other locations nearby. The evaluation of the pilot should be used to inform future policy and funding priorities.

In order to deliver an effective service in National Parks and other rural areas in future it may be necessary, ultimately, to completely change the way in which bus services are planned and operated. The current deregulated system in the UK is never going to deliver the kind of rural transport service that many other European countries have as it does not allow for any cross-subsidy between revenue-generating and loss-making routes. In contrast, the system which operates in most Scandinavian regions allows for some cross-subsidy meaning that there are generally higher levels of service provided in rural areas<sup>25</sup>. In Denmark, Sweden and Norway virtually all bus services have been franchised which has resulted in reduced costs and improved quality. A similar model could develop significant improvements to rural transport in this country. It should include a requirement for those planning and operating services to provide for access to recreational and visitor destinations as well as key services such as education and healthcare. The case for wider reform of the bus system is described in more detail in the report, *Building a world class bus system for Britain*<sup>26</sup>.

18. Cumulus Consultants Ltd & ICF GHK report for National Parks England (2013) *Valuing England's National Parks*
19. [https://www.thewestmorlandgazette.co.uk/news/10851958.Residents\\_move\\_into\\_new\\_homes\\_at\\_Grasmer\\_e/?ref=rss](https://www.thewestmorlandgazette.co.uk/news/10851958.Residents_move_into_new_homes_at_Grasmer_e/?ref=rss)
20. <http://www.passivhaustrust.org.uk/news/detail/?nid=666#.XBjQftv7Tct>
21. <https://www.newforestnpa.gov.uk/news/affordable-housing-helping-hampshire-rural-communities-thrive/>
22. Campaign for National Parks (2018) *National Parks for all: making car-free travel easier*  
[https://www.cnp.org.uk/sites/default/files/uploadsfiles/National\\_Parks\\_car-free\\_travel\\_HIRES DPS.pdf](https://www.cnp.org.uk/sites/default/files/uploadsfiles/National_Parks_car-free_travel_HIRES DPS.pdf)
23. <http://govamooz.co.uk/>
24. <http://www.bwcabus.traveline-cymru.info/>
25. <http://www.urbantransportgroup.org/resources/types/reports/scandinavian-way-better-public-transport>
26. [http://www.transportforqualityoflife.com/u/files/160120\\_Building\\_a\\_world-class\\_bus\\_system\\_for\\_Britain\\_FINAL1.pdf](http://www.transportforqualityoflife.com/u/files/160120_Building_a_world-class_bus_system_for_Britain_FINAL1.pdf)

### Part 3 - Current ways of working

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

#### Key recommendations in response to this question:

- **National Park Authorities must have the right balance of locally and nationally appointed members with the right mix of skills.**
- **The proportion of nationally appointed National Park Authority members should be maintained. These members represent the national interest and bring specialist skills in areas such as landscape, biodiversity and heritage, which are particularly important to the work of the National Park Authority.**
- **The standard and effectiveness of corporate governance arrangements in National Parks must be improved including through the introduction of fixed terms, compulsory training, role descriptions and appraisal for all members.**

National Parks are national assets which were created for the benefit of the whole nation and it is for this reason that they receive funding from the taxpayer. They are living, working landscapes providing homes



and workplaces for thousands of people. Those responsible for National Parks must, therefore, be able to balance the local and national needs and ambitions for these areas. This can only be done effectively if National Park Authorities have the right balance of locally and nationally appointed members and this is what the current governance arrangements are intended to provide. We would not want to see a reduction in the proportion of nationally appointed National Park Authority members. Not only are such members appointed to represent the national interest but they also bring specialist skills in areas such as landscape, biodiversity and heritage, which are particularly important to the work of the National Park Authority.

The governance arrangements should be improved to ensure that these areas are being governed in accordance with current good practice. For example, the governance of the charity sector has evolved and improved significantly in recent years but there has not yet been a similar level of change for NPA boards and there is now a lot of good practice available which could be used to help improve the governance of NPAs. We would encourage the review to consider, for example, the Charity Governance Code<sup>27</sup>, including the section on board effectiveness.

To address this, we would like to see the following approach:

- Each Authority should use a nominations/appointments committee to help identify what additional skills are needed on the Park Authority Board and help secure applications from people with appropriate skills. Such committees could also help ensure that Authority board members are more representative of wider society, for example, in terms of ethnicity and disability.
- Local authorities should be required to appoint members who represent wards which are at least partially within the Park and which reflect a geographical spread across the Park. This should be accompanied by a relaxation of the political balance rule.
- The introduction of fixed terms for local authority and parish appointees which include both minimum and maximum terms to be served, for example, members would be appointed for a three year term but could serve a maximum of only two or three such terms consecutively. This would ensure that members would serve for long enough to be able to contribute more effectively to the work of the NPA but would not be able to continue indefinitely. It would also provide parity with Secretary of State national appointees who are appointed on specific terms.
- Compulsory training for all members, on National Park purposes, planning policy and other relevant issues. While National Park Authorities generally make training available to members, there is currently no requirement for members to undertake training. We believe that all Authority members should be required to attend training in National Park purposes and governance and planning issues of specific relevance to National Parks. This is important even if they have already attended training as members of another planning authority as they need to understand the specific context in the National Park.
- The introduction of formal role description and a Code of Conduct for all members. Currently there is a role description for Secretary of State national appointees but we understand that there is not a role description for local authority and parish members. This should be accompanied by a peer appraisal process undertaken either by the Chair and Deputy Chairs of the same authority or by members of another authority. If done effectively, this can be used to manage poor performance as well as identify any ongoing training needs.

Consideration should also be given to reducing the number of members on Authority Boards as they are generally very large relative to the size of the organisation they are governing.

We are aware that from time to time the issue of direct elections for National Park Authority members is raised. While we clearly support the need for improvements to the governance of the Park Authorities, we do not support the introduction of direct elections for the following reasons:

- Direct elections would be complex and costly to introduce at a time of continuing financial restraint in the public sector when the focus should be on other priorities. A 2012 consultation<sup>28</sup> estimated the cost of holding direct elections in two NPAs to be in the region of £100,000 to £200,000. If direct elections are to be introduced this cost should not come out of Authorities' existing budgets.
- There is a risk that members with strong anti-Park or single issue views might be elected and that party politics might end up playing a greater role in Park Authority governance.
- There is also a risk that National Park Authorities will lose the range of expertise they need to perform their role effectively. Currently nationally appointed members have to complete an application process to demonstrate the skills they bring to the role and appointments are made in a way which ensures the availability of skills in areas such as heritage, biodiversity etc that the Authority needs.
- It would be harder to ensure the right mix of skills on sub-committees as well as ensuring representation from all the different types of appointee.

27. <https://www.charitygovernancecode.org/en>

28. [https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/82458/20120308-national-park-consult-doc.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/82458/20120308-national-park-consult-doc.pdf)

*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?*

**Key recommendations in response to this question:**

- **There is a need for a national body with a clear remit to champion designated landscapes within government and ensure they are being managed and run effectively. This body should also be responsible for ensuring compliance with relevant statutory requirements.**
- **This body should have sufficient resources and independence from government to allow it to perform its role effectively.**

If they are to fulfil their full potential and work together more effectively in future, the National Parks need strong leadership at a national level. In particular there is the need for a body with a clear remit to champion designated landscapes within government and to ensure that both National Park Authorities and AONBs are being managed and run effectively. This body should have responsibility for:

- Providing a leadership and vision for designated landscapes at a national level;
- Having oversight of the bodies managing the designated areas and holding them to account if necessary;
- Ensuring all parts of government are supporting designated landscapes;

- Undertaking research and development on issues of common interest to all designated landscapes;
- Sharing knowledge and information between all the designated landscapes and ensuring greater collaboration between National Parks and AONBs;
- Leading the work needed to prepare for any future new designated landscapes;
- Ensuring best practice with regard to governance and related issues such as member training and appraisal; and
- Monitoring and enforcing progress against the suite of environmental outcomes we propose in our response to Q8 and the statutory requirements relating to designated landscapes, such as the S62 duty to have regard to National Park purposes.

We do not wish to be prescriptive about exactly what body should deliver these functions but it is important that it is independent of government and delivers value-for-money. Currently it is Natural England who should be delivering this role and it may be that the most appropriate option is to ensure that it has adequate resources and independence so it can perform this role effectively. However, we note the recent comments by the outgoing chair of Natural England, Andrew Sells, about the organisation's inability to fulfil its legal duties effectively due to a lack of independence from Government<sup>29</sup>. We are, therefore, concerned that Natural England may not be able to perform the role of a national champion for designated landscapes without substantial reform. The alternative would be to set up a small, new national body responsible for delivering national leadership on designated landscapes. Such a body could be funded through the re-allocation of existing resources and would not necessarily require any additional funding.

29. <https://www.independent.co.uk/news/uk/politics/natural-england-austerity-cuts-budget-defra-michael-gove-brexit-andrew-sells-a8646941.html>

*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?*

**Key recommendations in response to this question:**

- **There is a need to build on the lessons learnt from the Campaign for National Parks Mosaic project to ensure that groups currently under-represented among visitors to the National Parks have more opportunities to visit.**
- **This should include measures which take a more proactive approach to seeking out people in their home locations and supporting them to visit the Parks. But in designing any engagement programme, consideration must be given to how people can be supported to visit in future under their own steam.**

The high quality environment in National Parks makes a significant contribution a wide range of objectives that help improve the nation's health and well-being. This ranges from tackling climate change and enhancing biodiversity and cultural heritage to encouraging physical activity and providing opportunities 'to get away from it all'. A recent report by the North York Moors National Park Authority<sup>30</sup> estimated that for every £1 invested by Defra in the NPA's activities to support visitors and volunteers, approximately £7 of health and well-being benefits were generated.

One of the key reasons for establishing the National Parks was to ensure that an increasingly urbanised population had opportunities for fresh air and outdoor recreation during their leisure time. Society has changed significantly over the last 70 years but there is now increased recognition of the physical and mental health benefits that the landscape and outdoor recreation provides. For example, research by the National Trust<sup>31</sup> highlights the profound impacts that nature deficit disorder has on children's health, especially with regard to obesity caused in part by a significant reduction in time spent playing outdoors. Natural England has also published a literature review<sup>32</sup> which found widespread recognition that experience of the outdoors and wilderness or wild spaces has the potential to confer a multitude of benefits on young people's physical development, emotional and mental health and well-being and societal development. In many parts of the UK, the only places that offer a wilderness-like experience are in National Parks.

For many years, Campaign for National Parks managed the Mosaic engagement programme which successfully recruited and trained hundreds of volunteer community champions to introduce thousands of people from urban areas to the physical and mental health benefits of National Parks. We targeted people from disadvantaged communities which are under-represented in National Parks. Evidence from the Mosaic community champions<sup>33</sup> demonstrates the benefits of introducing new visitors to the Parks. They cite examples of mental health benefits for people who feel more relaxed and happier as a result of visits to National Parks. There are also examples of people who have been introduced to walking on visits to National Parks and as a result have started walking more for local journeys in their own communities. This has obvious benefits in terms of health and social inclusion.

There is a need for National Park Authorities to continue to ensure that people from all parts of society are able to benefit from the special qualities of the Parks. A recent survey of non-visitors by the Peak District National Park Authority<sup>34</sup> identified a lack of awareness of what the National Park has to offer as the most common reason for not visiting (24%). A similar proportion of people cited transport reasons and we discuss this issue further in response to Q14. Here we focus on raising awareness of the Parks.

One way of doing this would be for Park Authorities to make more use of initiatives such as National Parks Week to promote the Parks to people who do not currently visit and support those people to take advantage of the opportunities they offer. The best way of doing this is likely to vary depending on the geography of the area and the number and size of nearby urban areas but is likely to be most successful when the National Park Authority reaches out to people in surrounding towns and cities. One example of what could be done is an initiative the South Downs National Park Authority adopted last year which involved promoting guided walks via stalls in various conurbations just outside the National Park. Rangers then met those who signed up in the centre of the urban areas and accompanied them into the National Park on public transport as well as leading them on a walk. As a result, the participants learnt about the bus routes into the Park as well as the activities on offer there, making it as easy as possible for them to visit independently in future.

30. <https://www.northyorkmoors.org.uk/about-us/how-the-authority-works/health-and-well-being>

31. National Trust, 2012, *Natural Childhood* by Stephen Moss

32. Natural England, 2010, *Wild Adventure Space: its role in teenagers' lives*

33. Campaign for National Parks (2014) *Investigating the impact of National Parks on health and wellbeing* <http://www.cnp.org.uk/sites/default/files/uploadsfiles/140530%20Impact%20of%20National%20Parks%20on%20Health%20and%20Wellbeing.pdf>

34. [https://www.peakdistrict.gov.uk/data/assets/pdf\\_file/0005/538772/vistor-non-visitor-survey-2014.pdf](https://www.peakdistrict.gov.uk/data/assets/pdf_file/0005/538772/vistor-non-visitor-survey-2014.pdf)

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

**Key recommendations in response to this question:**

- **Government should commit to multi-year funding agreements so that National Park Authorities can plan ahead more effectively and ensure that they are better able to deliver the National Park purposes and benefits to the public.**
- **We recognise the need to consider more innovative approaches to generating income. One option may be to consider the use of road pricing in selected locations both as a means of addressing the high level of damaging car use and to generate income to support alternative means of transport.**
- **Other existing pots of money, such as future environmental land management funding, need to be spent in a way which supports National Park purposes.**

As already discussed in response to previous questions, National Parks deliver significant benefits for the nation. If they are to continue to deliver these benefits in future, they must be well resourced, both now and in the future. We want Government to commit to multi-year funding agreements as this would allow National Park Authorities to plan ahead more effectively and ensure that they are better able to deliver the National Park purposes.

The National Parks provide good value for money. The recent research carried out by the University of York, for example, found that for every £1 invested by the government, the North York Moors National Park generates over £7 of health and well-being benefits for visitors and volunteers. We know that most of the Parks also now benefit from Heritage Lottery Fund landscape partnerships. There is a need for continuity of funding in order to be able to leverage additional resources from other sources, as well as maximising the support they are able to secure from engaging volunteers.

Reducing the budget for National Parks could prove to be a false economy if it leads to NPAs investing less money in conservation work, the maintenance of public rights of way and other activities which help support a thriving visitor economy.

This review is an opportunity to consider whether there are innovative approaches to generating income which could be adopted in National Parks to help support specific activities. As discussed in our response to Q14, we believe there is significant potential to consider the use of road pricing in selected locations both as a means of addressing the high level of damaging car use and to generate income to support alternative means of transport. However, we would be concerned about proposals to introduce a more general admission charge for National Parks as happens in some other countries. We believe this goes against the ethos of the creation of the Parks, that they are for the nation. There is also a risk the introduction of charges could deter some groups of people from visiting. The use of visitor taxes should also be considered with care as this could result in a reduction in people staying overnight within the Parks, with consequent negative impacts on the local economy in these areas.

It will also be important to ensure that existing pots of money, such as future environmental land management funding, are being spent in a way which supports National Park purposes. This is covered in more detail in our response to Q8.

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

**Key recommendations in response to this question:**

- **The designation process needs to be rigorous, but it would benefit from being quicker and less resource intensive.**
- **Natural England, or whichever body is responsible for designating National Parks, must have the necessary structures, resources and specialist expertise so that it can undertake its responsibilities with regard to designation efficiently and effectively.**

The process for identifying and designating new National Parks, or changes to the boundaries of existing ones, needs to be rigorous, but quicker and less resource intensive than the current process. We recognise, however, that as was the case with the extensions to the Lake District and the Yorkshire Dales, the process was elongated due to Ministers not taking final decisions.

As well as considering the process, it is essential that Natural England, or whichever body is responsible for championing National Parks at a national level (see Q16), must have the necessary structures, resources and specialist expertise to ensure that it can meet its responsibilities with regard to designation efficiently and effectively.

*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*

**Key recommendations in response to this question:**

- **Any new National Park must be created under the existing legislation and have a National Park Authority with planning powers.**
- **The creation of any new National Park and accompanying National Park Authority should be properly resourced and not lead to any reduction in the funding for existing National Parks.**
- **The boundaries of coastal National Parks could be extended to include their marine features and seascapes.**
- **While it would not require new designations, there is a need for stronger links to be made between National Parks and AONBs where they are in proximity. This could be in terms of sharing expertise and resources, but it must also be in relation to shared ambitions for environmental enhancement at the landscape scale.**

Campaign for National Parks is open to the idea of new National Parks being designated but we are not championing any specific area. We are aware that in some campaigns for new Parks, consideration is being given to potential new models for a National Park Authority. We believe that it is essential that any new National Park is created under existing legislation and has a National Park Authority with planning powers. As set out in our response to Q7 we believe these are important parts of the Parks' enduring success. If

anything different is introduced for a new National Park there is a risk that this will lead to pressure for similar changes to the existing National Parks and thus remove elements which are central to delivering the National Park purposes.

In addition, it is essential that the establishment of any new National Park and accompanying National Park Authority is properly resourced and does not lead to a reduction in the funding received by the existing National Parks. The Government should also show its full commitment to the importance of existing and any new National Parks by strengthening existing protections and not allowing any new National Park to introduce changes to elements which are central to delivering the National Park purposes, such as NPAs' planning powers.

With regard to other types of designation, there is a growing awareness of seascapes, and the life within them and there is a desperate need to manage these resources sustainably and make best use of their natural capital (fish, recreational opportunities, etc). The maritime dimension of coastal National Parks has not so far been adequately recognised and we believe that their boundaries could be extended out to sea. Marine Conservation Zones provide protection for particular habitats and species but currently there is no means, as there is on land for landscapes, by which the national importance of seascapes can be recognised and given the necessary framework for their long term conservation. Further, there is no statutory basis for recognising the marine dimension of National Parks.

To ensure that the land and sea dimensions of coastal National Parks are treated equally, consideration would need to be given as to how to:

- enable the extension of their boundaries out to sea to embrace the area of sea from which the National Park derives special qualities and its associations with the marine environment - the precise area to be included in the seaward extension would need to be the subject of detailed studies and consultations, in the same way as for the designation of a National Park on land;
- extend their Management Plans to cover the defined marine area;
- give the NPA the duty, powers and resources to manage water based recreation within the defined area – there is no organisation with such duties at present; and
- enable the creation of a committee of the NPA to have particular responsibility for the management of the marine environment with membership drawn from key stakeholders in the marine environment including fishing, water recreation, marine conservation and shipping.

While it would not require new designations, we believe there is a need for stronger links to be made between National Parks and AONBs where they are in proximity. This could be in terms of sharing expertise and resources between the Park Authority and the AONB staff. More importantly, however, the stronger links should also be in relation to shared ambitions for environmental enhancement at the landscape scale.

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

**Key recommendation in response to this question:**

- **The Marsden report includes reference to work the review panel had undertaken to understand how protected landscapes operate in other European countries, particularly with regard to governance models and approaches. The review should contact Terry Marsden and relevant Welsh officials to understand whether there is further learning from that process that is not publicly available but may be useful.**

We recognise that funding and central support, among other things, are managed differently in different countries. As the review team are aware, the Welsh Government recently concluded an extensive process of reviewing designated landscapes in Wales. The first part of this included a detailed report<sup>35</sup>, which was led by Professor Terry Marsden, and covered a wide range of issues such as the purposes, governance, funding and planning. The Marsden report looked at how the situation in Scotland differed from that in England and Wales and includes reference to work the review panel had undertaken to understand how protected landscapes operate in other European countries, particularly with regard to governance models and approaches. There may be further learning from this review that is not publicly available that it would be useful for the panel to draw on.

One of the key lessons to arise from the review process in Wales was the importance of recognising the international status of the National Parks and ensuring that no changes are proposed which potentially undermine this. National Parks play a key role in raising the country's profile internationally due to their importance as cultural and tourist destinations. National Parks in all parts of the UK currently meet international standards as part of a global framework for categorising the variety of protected areas around the world, endorsed by the IUCN. Their international status as Category V Protected Areas is a result of the long history and experience of prioritising conservation objectives within the boundaries of National Parks whilst they continue to be vibrant, lived-in, working landscapes and the UK's National Parks are regarded as worldwide pioneers in this field. However, this international status cannot be taken for granted and would be at risk if there was a weakening of the nature conservation objectives for National Parks. This was clearly demonstrated when members of the IUCN assessment panel raised concerns<sup>36</sup> about the potential risk to the international status of Wales' National Parks when there were suggestions that the Welsh Government might remove the Sandford Principle. Any loss of this international status could significantly reduce the benefits that National Parks deliver to the economy.

35. <https://gov.wales/docs/desh/publications/151020-review-designated-landscapes-report-en.pdf>

36. <http://www.bbc.co.uk/news/uk-wales-politics-40754816>

#### **Part 4 - Closing thoughts**

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

No comment.

*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?*

#### **Key recommendations in response to this question:**

- **The family of designated landscapes offer a unique opportunity to maximise other designated sites by having, and implementing, a landscape scale vision that seeks to protect and enhance them. To achieve this there is a need for greater collective leadership at the national level.**
- **Protections for nature must be maintained after the UK leaves the European Union.**



These designations are part of the fabric of the National Parks and the wider family of designated landscapes. The nature designations represent the most nationally and internationally important sites for nature and geology and the National Trails are hugely popular long distance routes that help people enjoy the designated landscapes but also provide links between some of them.

In light of the wide ranging first purpose of both the Parks and AONBs, and the second purpose of the Parks, the family of designated landscapes offer a unique opportunity to maximise all of these designated sites by having and implementing a landscape scale vision that seeks to protect and enhance them. For example, the wildlife sites should be nuclei from which nature can spread, but to achieve this a landscape scale spatial plan will be needed that understands the existing connectivity of habitats and species, and prioritises addressing gaps. While some of this is happening in individual Parks, a greater emphasis needs to be placed on developing the network on a national scale. To achieve this, we believe there is a need for greater, collective leadership that could be achieved by our recommendations set out under Q16.

We also note that European wildlife designations have often played an important role in protecting National Parks from development that would damage the ecology of these sensitive landscapes. This is particularly true when National Park Authority decisions need to be defended at a planning appeal. In research we commissioned in 2016<sup>37</sup>, National Park Authority officers felt that these regulations often carried greater weight with Planning Inspectors than the National Park designation, particularly where faced with pressures such as housing need and major industrial and transport infrastructure. To ensure that the many sensitive and important areas for biodiversity and wildlife in National Parks can be safeguarded, it is essential that protections for nature are maintained after the UK leaves the European Union.

37. [https://www.cnp.org.uk/sites/default/files/uploadsfiles/NationalParks\\_Planningforthefuture\\_LORES\(1\).pdf](https://www.cnp.org.uk/sites/default/files/uploadsfiles/NationalParks_Planningforthefuture_LORES(1).pdf)

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

##### 1. The role of the third sector

Campaign for National Parks was originally created in 1936 on the back of the incredible social movement that was campaigning for the creation of the National Parks in England and Wales. We welcome Julian's comments at our November Council meeting about the importance of the word 'national' in National Parks and believe that the third sector, acting at both the local and national level, plays a critically important role in protecting, enhancing and engaging people with the Parks. Some third sector organisations are substantial land owners within the designated landscapes, many play a critical role in engaging and supporting volunteers to support action on the ground, and others, like ourselves play more of a watchdog role. We hope that the role of all of these organisations will not be overlooked or underestimated by the review.

##### 2. Mineral extraction

Mineral extraction is one of the most significant forms of major development in national parks and represents the potential for enduring conflict with National Park purposes. The 2018 NPPF states the presumption against such forms of development, subject to the so called 'major development test' or 'Silkin test' (paragraph 172). Central to this test is the assumption that need would normally be met from outside the designated area. For minerals, this is reinforced in paragraph 205 of the NPPF which states that (as far as is practical) land banks of non-energy minerals should be maintained from outside National Parks and AONBs. In some National Parks, for example the Peak District, the NPPF policy is supported by local plan policies (of both the Park Authority and Derbyshire County Council) which provide for a shift in future supply to adjacent permitted reserves (outside the National Park) so as to allow a progressive reduction of mineral extraction impacts on the designated landscape.

A recent economic study<sup>38</sup> (commissioned by High Peak Borough Council adjacent to the Peak District) examined the mineral industry to 2040 and concluded that the current strict protection can be maintained into the long term future without wider socio-economic detriment. One of the key messages from this study is that the Peak District National Park Authority's current policies are likely to result in some displacement of extraction activities from the National Park to areas in the remaining parts of Derbyshire over the coming years but this is not anticipated to have a significant impact on overall local workforce numbers. In addition, the study strongly suggests that the infrastructure needs of the nearby Local Enterprise Partnerships (LEPs) - D2N2 and the Sheffield City Region - can still be readily met because of 'ample reserves'.

The leading driver for future demand for aggregate resources from the High Peak and Derbyshire Dales areas will be the delivery of major capital projects across the northern and eastern regions. There will be significantly higher levels of demand for aggregate resources over the coming decade and beyond due to the pipeline of known projects being promoted by the LEPs. However, it is considered that there is potential for increasing the supply of minerals should the levels of demand also increase, given the ample reserves of minerals in the two districts.

Strict protection, through the rigorous operation of the major development test and other NPPF policies, lies at the heart of long term sustainable development in National Parks and AONBs, and the evidence from the Peak District makes it clear that it is possible to achieve this without damaging socio-economic aspirations.

38. [https://www.highpeak.gov.uk/media/2674/Minerals--Aggregate-Extraction-in-High-Peak--Derbyshire-Dales--Draft-Report/pdf/Minerals\\_Aggregate\\_Extraction\\_in\\_High\\_Peak\\_Derbyshire\\_Dales\\_-\\_Draft\\_Report.pdf](https://www.highpeak.gov.uk/media/2674/Minerals--Aggregate-Extraction-in-High-Peak--Derbyshire-Dales--Draft-Report/pdf/Minerals_Aggregate_Extraction_in_High_Peak_Derbyshire_Dales_-_Draft_Report.pdf)

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