

## Response ID ANON-MW92-FH5N-Z

Submitted to **Landscapes Review: Call for Evidence**

Submitted on **2018-12-17 17:18:42**

### About you

#### 1 Are you replying as a member of the public or on behalf of an organisation?

Organisation

#### 2 If you are replying as a member of the public

What is your name?:

If you enter your email address then you will automatically receive an acknowledgement email when you submit your response. We may also use this to contact you further.:

#### 3 If you are replying on behalf of an organisation or organisations

Which organisation(s)?:

The Open Spaces Society

What is your name and position?:

Kate Ashbrook, General Secretary

If you enter your email address then you will automatically receive an acknowledgement email when you submit your response. We may also use this to contact you further.:

hq@oss.org.uk

#### 4 We would like to be able to use extracts from submissions in our final report. If you would not like them, potentially, to be made public, please tell us here.

Yes, I am content for you to use extracts of my response in the final report

#### 5 We have obligations under freedom of information laws and there is more information below. For the purposes of these laws, would you like your response to be confidential?

No

If you have answered yes, please give your reason:

### Before anything else

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

Upload :

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Yes, you can use my photo online or in the report

### 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

Please write your answer here:

Our national parks and AONBs have stood test of the last 70 years. They have retained their distinction and special qualities, there spectacular and breath-taking beauty, peace, wildness, and ability to inspire and to refresh. We believe that their purposes still hold good providing an appropriate balance between conservation and recreation, tempered by the Sandford principle.

We consider it essential that national park authorities retain their planning powers, because it gives them a vital tool in ensuring that their areas retain and improve their quality of landscape, history and culture. While it may be beneficial to delegate certain categories of planning to the borough, district or unitary council, the national park authority should always be able to call something in for determination itself. In AONBs it is vital that the view of the authority is given serious consideration by the planning authorities.

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

**Please write your answer here:**

Despite their special status, national parks and AONBs still suffer from inappropriate developments and creeping urbanisation. The duty on relevant authorities (largely public bodies) to 'have regard to national park purposes' in section 62 of the Environment Act 1995, and to 'have regard to the purpose of conserving and enhancing the natural beauty' of the AONB in section 85 of the Countryside and Rights of Way Act 2000, needs strengthening. 'Have regard to' is extremely weak. For instance, this should be amended to a positive requirement 'to further [national park or AONB] purposes' with a mandatory report each year to the environment secretary of what actions the body has taken to do this.

## **Part 2 - Views**

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

**Please write your answer here:**

We endorse the comments from the Campaign for National Parks.

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

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

**Please write your answer here:**

Common land is a significant feature of national Parks and AONBs. There are about one million acres of common land in England. Natural England has calculated that 48 per cent of commons by area (10 per cent by number) are in the national parks, and 31 per cent by area (23 per cent by number) are in the AONBs. This broadly reflects the difference in size between upland and lowland commons, the upland commons being larger than lowland commons. Therefore, it is not surprising that there are more and smaller commons in the AONBs which tend to occupy more lowland country.

Common land is of immense public benefit, for its natural history and wildlife habitats, landscape beauty, cultural, archaeological and historic heritage, and public access by right, on foot (normally under the Countryside and Rights of Way Act 2000) and, in many places, on horseback (under section 193 of the Law of Property Act 1925). But it is important that the vegetation is maintained at a suitable level, to enable people to walk and ride across the commons and enjoy nature and archaeology—whether on the North York Moors or the Surrey heaths.

This requires the appropriate grazing prescription for each area of land and there appears to be no mechanism currently to achieve this. With fewer farmers grazing the land, whether upland or lowland, we need incentives to ensure that the land is well managed. There is the opportunity for this in future agricultural funding schemes which will focus on public money for public goods.

Natural England, which determines the level of agricultural grants, tends to follow a set prescription, without taking sufficient account of terrain, climate and culture. As a minimum, the national park authorities and AONB boards and committees should be able to demonstrate best practice and ensure that the grazing levels are right to secure the most public benefit. It might therefore be better for these bodies to take on distribution of grants in their areas as they have people on the ground familiar with the local requirements.

National Park authorities and AONB boards and committees should encourage all those with an interest in the commons in their areas to form groups to oversee the management and care of the common; this could be a formal management committee, or an informal friends' group.

Grazing with livestock is deterred by speeding traffic. We oppose the fencing of unfenced roads across commons because it interferes with the landscape and public access and we believe that motorists should change their behaviour to suit the special environment of national parks and AONBs. We therefore advocate an enforced speed limit, of 40 mph or lower, on unfenced roads across commons. National park authorities and AONB boards and committees could take a lead in pressing for this, and such an approach could be piloted in selected designated areas. It would need full cooperation of the police to ensure that the limit was properly enforced.

### **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?**

**Please write your answer here:**

As mentioned above, national park authorities and AONB boards and committees could take on the role of advising on and distributing agricultural grants within their areas.

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

**Please write your answer here:**

Rights of way and access within the national parks and AONBs should be exemplary. Not only do they benefit the health and wellbeing of residents and visitors, but they also help to boost the local economy.

AONB boards and committees should be given a greater role in the provision and management of recreation and access.

The national park authorities and AONB boards and committees should strive to remove any unauthorised structures on public paths, or any which are inconvenient for public use (with the exception of those which are of heritage value, such as squeeze stiles).

These bodies should also ensure that they have no access land which is inaccessible, by persuading landowners to provide more access points where people need them. They should champion greater access to woodland and riverbank by liaising with landowners and encouraging them to dedicate land under section 16

of the Countryside and Rights of way Act 2000.

All this should be assisted by the new environmental land management schemes which will fund public access as a public good.

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

**Please write your answer here:**

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

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

**Please write your answer here:**

**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?**

**Please write your answer here:**

All national park authority and AONB members should be subject to similar rules and practices, whether they are a councillor or Secretary of State's appointee. At present different rules apply and Secretary of State members can feel like second-class citizens.

All appointments should be subject to a clear, competitive process, and all candidates should know what is expected from them before they start and, once appointed, they must sign up to support the national park or AONB purposes and undergo training. All should have limited terms and all should be subject to appraisal.

Service on a national park authority or AONB board or committee should be seen as an accolade, something to which to aspire.

**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?**

**Please write your answer here:**

National parks and AONBs have too low a profile. Government should recognise and celebrate the good practice which emanates from the national parks and AONBs. There should be an independent body to lead these designated areas, which should be Natural England (if its independence could be restored) in view of its statutory purposes.

That body could, among other things, encourage public bodies to further national park and AONB purposes, share knowledge and learning between the national parks and AONB family, advise on and promote best practice, and ensure that all government departments support the designated landscapes.

**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?**

**Please write your answer here:**

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

**Please write your answer here:**

National parks and AONBs need to have secure, long-term funding so they can plan over longer periods.

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

**Please write your answer here:**

Designation is currently too complex and long-winded. It should be simplified and shortened. We would support a review to see which areas merited designation as either National Park or AONB, provided the funding for the rest is not reduced.

**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.**

**Please write your answer here:**

We believe there are many areas which merit consideration, the proposed Dorset and East Devon National Park being just one example.

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

**Please write your answer here:**

**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?**

**Please write your answer here:**

No, we do not consider the terms should be altered. When you have a strong recognised brand it is unwise to change it.

**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?**

**Please write your answer here:**

National Park Authorities and AONBs could take on greater responsibility for managing the designated sites within their areas. Natural England or whatever other body is identified as the leader for National Parks and AONBs (see our answer to Q16) should ensure that all the designations work well together to mutual benefit. We believe all these designations are important, and would add Scheduled Ancient Monuments and Areas of Archaeological Importance to the list. Many of these designated sites are registered common land, so strong commons management committees, with wide representation, will also be helpful.

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

**Please write your answer here:**