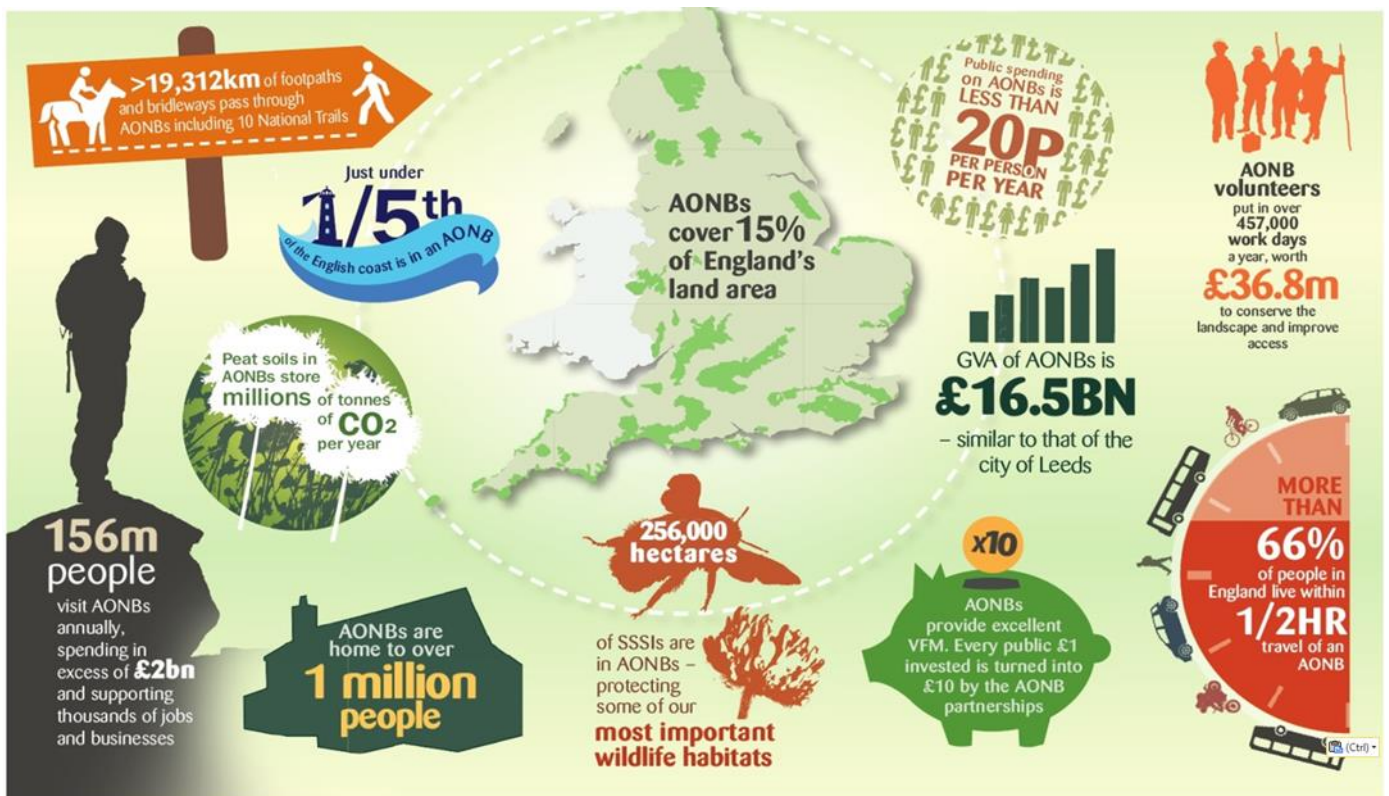


# ‘Outstanding!’

## The AONB Family’s evidence to the Review of England’s National Parks and Areas of Outstanding Natural Beauty



## ***Contents***

<i>AONBs are treasured national assets and deliver benefits beyond their boundaries .....</i>	<i>3</i>
<i>AONBs optimise the potential of England's finest landscapes.....</i>	<i>4</i>
<i>AONBs could do even better with relatively simple changes .....</i>	<i>5</i>
<i>AONBs could do more for wildlife and ecosystem processes .....</i>	<i>6</i>
<i>Protecting and valuing cultural heritage is a vital part of the work of AONB partnerships .</i>	<i>7</i>
<i>Working with farmers and land managers is central to AONB purpose and practice .....</i>	<i>8</i>
<i>AONBs offer access and recreational opportunity for all.....</i>	<i>8</i>
<i>AONBs are living, working landscapes .....</i>	<i>9</i>
<i>Housing and transport are critical issues for AONBs .....</i>	<i>10</i>
<i>AONB governance structures are only partially effective and must be strengthened.....</i>	<i>11</i>
<i>AONBs work in partnership with stakeholders and the public and with each other .....</i>	<i>12</i>
<i>AONBs benefit health and well-being; they are diverse, inclusive and participatory and volunteers are central.....</i>	<i>13</i>
<i>The benefits of AONBs should be adequately resourced .....</i>	<i>14</i>
<i>AONB designation engages all stakeholders – but could be simpler and better communicated.....</i>	<i>15</i>
<i>Extension of the area of designated landscapes is needed in appropriate circumstances and could include modification of the designation procedure .....</i>	<i>15</i>
<i>AONBs are learning landscapes and centres of innovation and creativity .....</i>	<i>16</i>
<i>AONBs are England's vital and treasured national landscapes .....</i>	<i>17</i>
<i>Other designations are vital to delivery of AONB purposes.....</i>	<i>18</i>
<i>Proposals for posterity.....</i>	<i>18</i>

## *Introduction*

### *Part 1 - Opening thoughts*

#### **AONBs are treasured national assets and deliver benefits beyond their boundaries**

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

England's 34 Areas of Outstanding Natural Beauty cover 15% of the land surface. They comprise some of our most beautiful and cherished landscapes. They are rightly regarded as treasured natural assets and are valued throughout the world. They produce immense benefits beyond their boundaries:

- They are places with strong, individual identities based on recognisable and distinct character.
- They have great environmental, social, and cultural importance with values derived largely from the interaction of people and nature over time.
- They are all accessible and are visited annually by over 150 million people who appreciate them as places for their recreational and health benefits and their rich [natural and cultural values](#).
- Their natural and semi-natural ecosystems are relatively rich in wildlife and play an important role in maintaining environmental quality; their trees and woodlands recirculate atmospheric gases; their upland peats and lowland wetlands are a vital storehouse of carbon, retain rain and help to ensure a supply of water for homes and industry.
- Their farms and rural industries are an important source of [food and other agricultural products, timber, craft products and firewood](#).
- They are an integral part of England's diverse, and dynamic, cultural identity. They have inspired generations of [writers, artists, poets, film makers](#), and [composers](#) and form the cultural backcloth to many people's lives – residents and visitors.
- They are home to around a million people who live in the thriving communities of their small market towns, villages and hamlets. They provide a livelihood for those who work in or around them.
- These benefits come at a very low cost to the taxpayer – less than 20p per person per year.

## **AONBs optimise the potential of England's finest landscapes**

### ***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.***

AONBs are part of a global network of protected areas and have served the nation well since their creation by the 1949 National Parks and Access to the Countryside Act. They have withstood the test of time, are trusted, locally and nationally, have proved themselves capable of adapting to changed circumstances and acting as the focus for innovation.

Key elements in the present effectiveness and success include:

- The AONB partnership structure, in particular the mix of locally accountable elected members representing all relevant local authorities, with officers from national agencies and local interest groups. This provides an effective and democratic structure for deciding local priorities and co-ordinating shared programmes of action.
- The relevance of AONB partnerships' work to national and local policy objectives. Sustainable development, the ecosystems approach and the environment as an economic driver and determinant of health and wellbeing are all core tenets of the AONB purpose and have widespread acceptance in national and local policy.
- AONBs have long been recognised by Government as potential 'test beds' for new ways of working that can subsequently be applied outside AONBs.
- Access to external project funding including Lottery monies together with the Sustainable Development Fund (SDF) has meant that AONB partnerships/Conservation Boards have a track record in pioneering innovative projects to support sustainable tourism, healthy communities and take forward landscape scale ecological restoration in the light of pressures such as climate change.
- New ways of working with the private and voluntary sectors (such as through community interest companies, charitable trusts and friends' groups) take advantage of the different mix of skills and resources that these institutional models can offer and have potential to fill some of the spaces left by a smaller public sector.
- Dedicated AONB staff teams whether based on Local Authority structures or in Conservation Boards provide AONB partnerships with delivery capacity, long term credibility and local expertise; they provide flexibility, the ability to react quickly to opportunities and enable partnerships to 'punch above their weight'.  
In all the above, collaboration and learning are key. The great range of experience and variety of approaches within and between AONBs is facilitated by the National Association which coordinates their lead officers and staff to ensure that the benefits of cooperation and collaboration are widely shared and result in behavioural change within and beyond individual AONB partnerships.
- National Park Authorities and the two AONB Conservation Boards have a second purpose to increase the understanding and enjoyment by the public of the special qualities of the area. This gives formal legitimacy to the need to address issues of public engagement and manage recreation opportunities.
- All National Park Authorities in England are the statutory local planning authority for land within their boundary, responsible for all aspects of planning, including all development management. The ability to create their own local development plans to

frame their planning policy ensures they are better able to align development planning decisions and the delivery of their purposes.

## **AONBs could do even better with relatively simple changes**

### **Q 8. What do you think does not work overall about the system and might be changed?**

Despite the successes of AONBs, individually and as a family, public awareness remains low and the designation is little understood, often being seen primarily as a descriptive term.

- Wildlife and cultural heritage are not explicit targets of AONB management
- AONBs are vulnerable to development and other pressures.
- Access, recreation and public enjoyment and well-being are not formal purposes of AONBs, so efforts to address the needs of under-represented or excluded groups are *ad hoc* and uncoordinated.
- Social and economic benefits for communities within and beyond AONBs are dependent mainly on individual initiatives of AONB staff teams.

Moreover, high-quality landscapes, and their increased desirability as places to live, can result in social divisions and exclusion, as evidenced by differentials in house prices which can make it difficult for individuals in 'lower' socioeconomic groups to secure homes and, in areas adjacent to major towns, can result in them becoming part of a commuter belt.

Some of these issues should be addressed by aligning the purposes of England's AONBs and National Parks with each other and with the principles of government's [25 Year Environment Plan](#) (25YEP).

AONBs could work better for all the people of the UK their value should be taken more seriously by decision-makers, and their ability to connect not just nature, but people could be more effectively realised. This will, however, require a more effective cross departmental approach to policy making at a local and national government level.

A number of proposals are made in what follows to 'future proof' England's designated landscapes, in particular AONBs, with respect to wildlife, ecosystem processes and cultural heritage, to recreation and access, to farming and land management and to the wider economy, including housing and transport.

Some of these should be more firmly embedded in adjustments to the AONB statutory purpose specifically to include '*wildlife and cultural heritage*' and to add the promotion of understanding and enjoyment of their area's special qualities as a subsidiary purpose.

AONBs should also be given a more explicit societal function in relation to social and economic well-being.

In addition, the weak 'duty of regard' should be replaced with a 'duty of due regard' which would provide all relevant bodies with a clear framework within which to operate.

Other changes, such as giving AONB staff teams the capacity to play a leading role in the local delivery of agri-environment and new environmental land management schemes and

to deliver action for climate change adaptation and mitigation can be implemented at the policy level.

Most importantly, AONB partnerships and the National Association for AONBs are critically under-resourced. Adequate funding is required to provide the capacity that their individual and collective potential deserves.

## ***The AONB Family's perspective***

### **Part 2 - Views**

#### **AONBs could do more for wildlife and ecosystem processes**

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

AONBs comprise biologically rich and complex landscapes. They are an integral part of England's ecological network, providing strongholds for some of the nation's most important and threatened wildlife sites and habitats. AONB partnerships - acting together and with others - play a vital role in the conservation of biodiversity, enhancing the coherence and resilience of natural and semi-natural habitats.

AONBs in England encompass: 25% of England's SSSIs, 24% of England's most important wildlife habitats 20%) of England's total woodland cover and 30% of England's Ancient Woodlands. They include important areas of upland peatlands and lowland wetlands which in addition to their biological richness have a critical role in carbon sequestration and water management. AONBs are vital to the delivery of many of the UK's ecosystem services, and have a central role in engaging people in decisions on the distribution of their benefits.

The primary purpose of the AONB designation as provided for in the 1949 Wildlife and Countryside Act is to '*conserve and enhance natural beauty.*' A series of legal decisions and policy statements since this date have made it clear that the phrase 'natural beauty' is not just scenery but includes landform and geology, plants and animals, the historic environment and cultural heritage.

However efforts to conserve and enhance these material aspects of the landscape are weakened in AONBs by comparison with National Parks whose first purpose is to '*to conserve and enhance the natural beauty, wildlife and cultural heritage*'; the 'wildlife and cultural heritage' does not currently explicitly apply to the AONB purpose. Legislation should be enacted to align the first purpose of AONBs with that of National Parks, so that the objective of conserving natural beauty and wildlife applies equally to both AONBs and National Parks.

In addition, the central role of AONB and National Park management plans in the restoration of nature and ecosystem services should be ensured through development and support for the role AONB teams will play in delivering on Outcome 1c of Biodiversity 2020 and their crucial role in supporting any emerging Nature Recovery Network, mandatory requirements for Net Environmental Gain and other outcomes included in the Government's 25 Year Environment Plan..



In this way the conservation management role of designated landscapes will also deliver on climate change adaptation and mitigation, for example, through promoting and supporting the enhancement of green infrastructure and providing targeted support for projects designed to restore key ecosystems including wetlands and upland peats.

Finally, consideration should be given to better enabling designated landscapes to engage where appropriate with offshore management of the marine environment, giving them a role in achieving the co-ordinated management of the coastal and marine environment.

## **Protecting and valuing cultural heritage is a vital part of the work of AONB partnerships**

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

AONBs are pre-eminently cultural landscapes and they include some of the nation's most important historic heritage. For example, 23% of England's Scheduled Monuments and 27% of England's Protected Wreck sites lie within AONBs. The AONB Family works hard to conserve and enhance this heritage for the enjoyment of current and future generations. Examples range from the work of the [Chilterns AONB partnership on Bronze and Iron Age hillforts](#) (one of the densest concentrations in the country) to [Nidderdale AONB's centenary study of First World War history in the Yorkshire Dales](#).

Research, protection and education about the historic and cultural heritage features in all AONB management plans and a number of AONBs have worked to produce design guidance that supports the continuation of local vernacular architecture in a contemporary context.

Importantly, many AONBs have been able to go beyond a relatively limited view of 'culture' to a more inclusive interpretation which extends from vernacular buildings to the more dynamic and sometimes ephemeral contemporary cultural forms – ranging from oral history to music and sports which are so important in community life and amongst young people.

In order to remain relevant to future generations, more work must be done to ensure contemporary cultural values are reflected in AONB management plan objectives. However, the conservation and enhancement of cultural heritage – a key element of the first purpose of England's National Parks does not currently apply to AONBs. This omission should be addressed by aligning the first purpose of AONBs with that of National Parks by adding: 'to conserve and enhance the natural beauty, wildlife and cultural heritage'. AONB partnerships should then optimise the benefits of their proximity to towns and cities to become more representative of society. Increased participation and better representation will result in greater legitimacy and help strengthen links between identity and place.

As suggested in the National Association's response to other questions, the protection of landscape, nature and the cultural heritage within AONBs should also be strengthened by:

- The replacement of relevant bodies' Duty of Regard with a Duty of Due Regard.
- Placing a duty on relevant authorities to support the delivery of the AONB management plan.
- Giving AONB partnerships statutory consultee status for Town and Country planning matters.

- Encouraging, where appropriate, the production of dedicated Development Plan documents for AONBs which share the same vision and objectives of the Management Plan.

## **Working with farmers and land managers is central to AONB purpose and practice**

**Q 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?***

From the open moorlands of the North Pennines, Nidderdale, and the Forest of Bowland, through the undulating grasslands of the Chilterns and Cotswolds, to the more intimate wooded landscapes of the High Weald and Kent Downs, each AONB is the product of farming practice, and their value to the whole nation is largely dependent on sympathetic future land management.

AONB partnerships have worked collaboratively with farmers since their creation. Through projects such as the [Cranborne Chase Farmland Conservation Project](#) and the [North Pennines Hay Time](#), AONB teams have continued to build on the quality of this relationship and maintain close and practical working partnerships with farmers.

AONB partnerships should be given the capacity to play a leading role in the local delivery of agri-environment schemes.

Building on the trust and experience that already exists, [the AONB Family have proposed](#) that AONB management plans should provide the framework for the development of a post Brexit environmental land management scheme in and around AONBs. The integrated nature of these plans ensures that agricultural policy is cross referenced to wider environmental, social, and economic outcomes, and integrated delivery at the local level will improve opportunities for simpler, cheaper, more effective delivery.

In regions that have high coverage of designated landscapes, schemes could include more than one AONB or National Park working in partnership. In some AONBs, schemes could be trialled in small parts of the designated area.

## **AONBs offer access and recreational opportunity for all**

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

The proximity of many AONBs to large conurbations means that they generally offer easier access for more people both in terms of distance and transport links than National Parks. They also have extensive, though variable, networks of footpaths and bridleways, are traversed by 10 National Trails and feature significant areas of Open Country, Registered Common Land or Section 16 Dedicated Land, (around twice the proportion of the English countryside in general).

As a consequence, AONBs today attract 156 million visitors each year compared to around 90m visitors for National Parks. Despite this, without a formal recreational purpose, AONB



teams only have a weak basis for managing access and recreation, which will continue to be driven by significant but *ad hoc* initiatives to build links with underrepresented or excluded groups in adjacent urban areas. Participation will continue to be driven by wider social forces including advertising (mountain bikes, outdoor clothing) designed to grow the outdoor recreation market and will remain significantly skewed in social and economic terms.

AONB partnerships would be keen to do more to facilitate the use of the landscape for recreational purposes by currently excluded groups. Additionally the National Association would be keen to explore how the collective governance of AONB Family strategic priorities and the opportunities afforded by National Trails could be better integrated.

At present, the policy basis of provision in this area is based on the remit of relevant local authorities and codified in the (then) Countryside Commission's 1991 Policy Statement on AONBs and rehearsed in its 1992 publication [AONB Management Plans: Advice on their Format and Content](#) (CCP 352): *'Recreation is not an objective of the designation, but the demand for recreation should be met insofar as this is consistent with the conservation of natural beauty and the needs of agriculture, forestry and other uses.'* The statement is repeated in the (then) Countryside Agency's [2001 Guidance on AONB management planning](#) (CA23) issued following the Countryside and Rights of Way Act 2000.

CA23 at least has statutory status but is no longer a 'live' document and a reaffirmation of the access and recreational significance of AONBs is urgently needed. The current supplementary purpose of meeting the demand for recreation should be formalised (and aligned with that of National Parks) through the addition of a statutory AONB purpose of actively promoting opportunities for the understanding and enjoyment of the special qualities of areas of outstanding natural beauty by the public.

This would provide formal recognition of the fact that all AONB partnerships already play a major role in delivering opportunities for outdoor understanding, enjoyment and recreation in England and indeed operate as if this was a formal purpose of designation. The purpose should be expressed in a way common to both designated landscape classifications.

## **AONBs are living, working landscapes**

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

The AONB designation and the work of AONB partnerships yield major benefits for many of those who live and work in their areas, but more can be done

The [AONB Family's evidence to the Rural Economy Growth Review](#) emphasised the way that, working with local communities and businesses, and by valuing their skills, knowledge and energy, AONB partnerships 'make things happen'. Translating vision and national policy into local action they have developed innovative and collaborative approaches to promoting a sustainable rural economy that conserves and enhances the natural environment for the benefit of all.

AONBs provide value for money by securing additional funding, resources and project partners and they [contribute significantly to the local economy of their areas and beyond](#). The 156 million AONB visitors annually spend in excess of £2 billion and support thousands

of jobs and businesses. In 2014, the GVA of AONBs was £16.5 billion – similar to that of the city of Leeds.

AONB partnerships have achieved significant success in fostering local initiatives including those related to community engagement and the development of small businesses. Examples include local branding of foodstuffs and other produce such as furniture and other timber products and woodchip production providing an economic incentive for the regeneration of local coppice.

However, more needs to be done, in particular to address issues of equality of opportunity and environmental justice. Even within the present statutory framework this could be strengthened, for example, through the provision of a hypothecated Sustainable Development Fund for both AONBs and National Parks. This would enable AONB teams to better support community and business activity allied to the purpose of designation.

As in the case of access and recreation, the policy basis of AONB units' role in social and economic development is based on the remit of their relevant local authorities as codified in the (then) Countryside Commission's 1991 Policy Statement on AONBs and given a quasi-statutory basis in the (then) Countryside Agency's [2001 Guidance on AONB management planning](#) (CA23): *'In pursuing the primary purpose of the designation, account should be taken of the needs of agriculture, forestry and other rural industries and of the economic and social needs of local communities. Particular regard should be paid to promoting sustainable forms of social and economic development that in themselves conserve and enhance the environment.'*

The ease by which most AONBs can be accessed creates opportunities for AONB partnerships to support skill development programmes and apprenticeships, provides meaningful opportunities for volunteering, and through social prescribing could help the national become healthier. Development in this area requires investment.

We would also like to see a formal duty in respect of sustainable social and economic development for all AONBs (as is presently the case with National Parks and Conservation Board AONBs) to *'Seek to foster the economic and social well-being of local communities...'* This would ensure that the needs of all sections of society are considered in decision making, not least in the exercise of a Duty of Due Regard.

## **Housing and transport are critical issues for AONBs**

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

A major difference between National Park authorities and AONB partnerships is that the former are the statutory planning authorities for their areas whilst in AONBs, planning duties rest with the relevant local authorities. This remains an appropriate arrangement, however support for appropriate (and protection from inappropriate) development should be significantly strengthened for all designated landscapes by:

- Utilising the opportunities afforded by an Environment Act, replace the current Duty of Regard by a Duty of Due Regard.
- Government to support a consistent cross-departmental policy approach to sustainable development in designated landscapes.

- Government monitoring of Planning Authorities' performance in respect of AONB purposes and associated accountability with incentives for Planning Authorities' performance.

And in the case of AONBs:

- Legislation should place a duty on relevant authorities to support the delivery of the AONB management plan.
- Using the provision set out in Article 18, Schedule 4 of the 2015 Development Management Procedure Order (DMPO), AONB partnerships should be given statutory consultee status for Town and Country planning matters.
- The production of dedicated Development Plan documents for AONBs should be encouraged where appropriate.
- Consider developing a dedicated group of Planning Inspectors trained specifically on, and called to preside over cases in or affecting designated landscapes.

Adequate public transport facilities to and within all designated landscapes is a key requirement if they are to fulfil their potential both for residents and visitors, particularly those from under-represented or excluded groups (including those without cars). A number of initiatives taken by AONB partnerships and National Park Authorities have shown what can be achieved through creative and relatively inexpensive initiatives. Government support for further initiatives would enhance social inclusion and increase the accessibility of AONBs to all sectors of society

## ***Protecting our national landscapes***

### ***Part 3 - Current ways of working***

#### **AONB governance structures are only partially effective and must be strengthened**

**Q 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?**

A strength of AONBs is that their governance models are adapted to suit to local circumstances and achieve wide local 'ownership'. Two AONBs – the Cotswolds and the Chilterns – have statutory Conservation Boards. In all other cases, AONB partnerships are non-statutory. Current legislation provides only that their relevant local authorities should 'have regard' for the purpose of conserving and enhancing the natural beauty of that part of the AONB that falls within their area, for which they must produce a management plan and review this every five years. This latter function may be delegated to an AONB partnership (particularly where several local authorities are responsible for an AONB) but the means whereby this is to be achieved is not prescribed.

This has significant advantages in permitting AONB governance models, and the mechanism by which the designation's purposes are delivered, to reflect local requirements and we believe that this flexibility should be retained. However, it sometimes means that the AONB may not be a high priority for its partnership organisations in consequence of which the

partnership may lack sufficient authority to address key governance issues including performance.

Additionally, and as a consequence of its local focus, its status as a nationally important landscape is often overlooked in decision-making, and the role of guardianship on behalf of the nation often not considered.

Most importantly, there is no statutory duty on AONB partnerships or local authorities to implement their management plans and delivery is currently largely undertaken by the AONB teams with individual partnerships in many cases being reduced to stakeholder fora.

Strengthened governance and accountability for all AONBs would be achieved by:

- AONB partnerships being granted a legal status and a statutory duty to implement management plans with associated scrutiny and accountability.
- All relevant authorities being given a duty of 'due regard' and a statutory adviser to government appointed with the responsibility to ensure that this duty is carried out.
- Government giving more weight and emphasis to statutory designated landscape management plans as a local delivery vehicle. This should be embedded in the emerging Environment Act.
- Enhanced status through improved terms of reference and training for members and the use of national appointees.

AONBs require sustainable governance structures in place that reflect both local and national interests that are appropriate to deliver the desired outcomes.

The creation of new AONB Conservation Boards or National Park Authorities should be considered in the light of local circumstances and national interest and, in particular, the degree to which delivery may be currently limited by the category of designation. In the great majority of cases relatively minor legislative and policy changes to all AONBs will secure the outcomes required but where there is compelling evidence to support the need for organisational change, the National Association would support this.

## **AONBs work in partnership with stakeholders and the public and with each other**

***Q 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?***

The partnership nature of AONB governance places a premium on collective working with all stakeholders. This is manifest in practice through a host of delivery activities involving local communities, businesses, farmers and other landowners and volunteers. Delivery is primarily by proxy and based on the understanding and commitment of others.

That practice is also reflected within each AONB at a policy level. Since 2001, [statutory guidance for production of AONB management plans](#) emphasises the need to 'include active participation of stakeholders from the very beginning' and 'determine a set of mutually agreed objectives and priorities – by consensus.'

Each AONB partnership is autonomous within the statutory responsibilities of the relevant local authorities responsible for each AONB and the specific delivery mechanisms and activities vary according to local circumstances.

AONB partnerships work together— informally and through the National Association for AONBs. The National Association provides leadership on strategic, national matters, facilitates shared learning, organises an annual [Landscapes for Life Conference](#) and other national events, and provides advice and training to the AONB Family which it represents at a national level, through its single voice to governments. Recent policy documents and position statements include a collective [response to the government on the draft National Planning Policy Framework](#), [Evidence to House of Commons Environmental Audit Committee inquiry on The Future of the Natural Environment after the EU Referendum](#) and evidence to Defra on [the role of AONBs as test beds for any new post-Brexit environmental land management scheme](#).

Through the National Association, the AONB Family has agreed four common objectives. These are collectively furthered through the sharing of information, data, and ideas, in particular using the National Association's dedicated on-line forum 'Basecamp'. Additionally, the National Association makes available examples of good practice and other resources. AONB staff regularly work with the National Association on behalf of the collective. The charity also works closely with many other organisations including National Parks England to foster collaborative working across multiple organisations.

The potential for collaborative working across AONBs and National Parks is huge. This is already being achieved at a local, regional, and national level but more could be done. However, it is essential that both forms of designated landscapes achieve parity of status, influence, and resourcing before true collaboration can further develop.

To address issues of coherency, direction, and status Government should issue a single remit letter to AONBs and NPs (and the National Association), signed by the Prime Minister, linked to their Defra grant. This would provide a unifying steer on priority issues. This is the process by which the French PNR Charters are enacted and would give cross Cabinet support for something that then carries weight and creates great cohesion across landscapes and organisations.

The National Association's HLF Resilient Heritage funded [Future Landscapes Project](#) includes a review of the National Association's sustainability and governance and 'Taking the Lead', a professional and personal development programme engaging a cohort of AONB staff to help develop greater collaborative working across the AONB Family.

## **AONBs benefit health and well-being; they are diverse, inclusive and participatory and volunteers are central**

***Q 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?***

AONBs are a vital resource for active leisure, provide the opportunity for getting outside, and offer mental, spiritual and physical wellbeing for people of all ages and backgrounds. Evidence clearly suggests that an emotional connection with nature is more beneficial than

contact alone and ultimately leads to pro-environmental behaviour. Meaningful connection to nature delivers enormous individual and social benefits. AONBs are accessible to a large proportion of the population; more than 66% of people in England live within ½ hr travel of an AONB. This accessibility offers multiple opportunities.

Examples of AONB partnership initiatives to encourage volunteering, improve health and well-being and to involve underrepresented groups include Blackdown Hills AONB's [Nature and Wellbeing](#); Dorset AONB's [Stepping into Nature](#); Wye Valley AONB's [Mindscape](#); Norfolk Coast AONB's [Coast Alive Health Walks](#) and the joint Blackdown Mendip and Quantock Hills AONB's [Let Nature Nurture](#). AONB teams, often with the support of the National Association, have been particularly successful at working with arts-based organisations to improve people's engagement with nature. Examples of this innovative approach to connecting people with their landscapes include the [Lifecycles and Landscapes Project](#) and the [Wye Valley River Festival](#)

Cumulatively these have been outstandingly successful, so that, for example, volunteers put in over 457,000 work days a year, worth £36.8 million to conserve the landscape and improve access.

Yet a good deal more could be done. Addition of a formal second AONB purpose of furthering the understanding and enjoyment by the public of their special qualities, a formal duty in respect of sustainable social and economic development, coupled with adequate core funding of AONB partnership delivery teams would provide a stable base for extending the reach and inclusivity of AONB partnership efforts in this area.

## **The benefits of AONBs should be adequately resourced**

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

All designated landscapes need to be adequately resourced to support the delivery of their statutory purposes. The funding allocated to just one National Park - the South Downs National Park – is more than the funding for all 34 English AONBs put together. The latter – an annual total of just c. £6m (amounting to around 20p per head) compares with an annual turnover of around £14m per annum, reflecting the remarkable success of AONBs in securing additional funding from other sources. Lottery sources in particular have contributed a total of some £80 million over the past twenty years, however the termination of HLF's Landscape Partnership programme means that future lottery funding for AONBs is in jeopardy.

AONB delivery is likely to continue to depend on a business model involving a mix of public, private and voluntary-sector resources, however secure core funding is essential to safeguard the future of these national assets, and should be aligned with the effective delivery of revised statutory purposes (including recreation and enjoyment, together with a social duty), and mechanisms need to be reinstated to address the issue of vulnerability arising from the relationship with host Local Authorities whose total budgets will have been [cut by an average of 50% since 2010](#).



In addition, there needs to be adequate funding of Town and Country planning activity to allow designated AONB unit planning officers to effectively manage major planning applications and a new statutory consultee responsibility.

A dedicated Sustainable Development Fund for both AONBs and National Parks would enable AONB teams to better support community and business activity allied to the purpose of designation.

Finally, there is a clear need for Natural England to be adequately resourced to function as a national statutory advocate for landscape, championing the role of AONBs across government.

## **AONB designation engages all stakeholders – but could be simpler and better communicated**

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

The existing process of designation of AONBs under section 82 of the CROW Act is broadly satisfactory. However, it is poorly communicated to stakeholders and consequently perceived as a barrier to designation rather than a process to confirm landscape quality.

The criteria for designation must continue to link clearly and robustly to the purpose of designation, and the process of designation must be participatory and engage stakeholders. This means that the sufficiency of natural beauty must be paramount.

It is important that the weight attributed to the first stage of designation – the confirmation of ‘sufficiency’ of natural beauty remains greater than that attributed to the second stage – the ‘desirability to designate’. It is vitally important, therefore, that Natural England as the statutory adviser on landscape is resourced to provide this technical advice, and that decisions are capable of robust defence.

The effective communication of the process is vital, not only with designated landscape staff and stakeholders, but also with other interested parties who may pursue AONB or National Park designation.

Engagement of stakeholders is important but can be time-consuming. The participatory principle of AONB partnerships would suggest that in any proposal for a boundary variation, local communities might be assisted in preparing evidence together with the AONB team. Local knowledge, data, and energy would help speed up the process.

## **Extension of the area of designated landscapes is needed in appropriate circumstances and could include modification of the designation procedure**

### ***Q 20. What views do you have on whether areas should be given new designations?***

Several areas presently outside the AONB Family have long been considered of AONB quality. The Forest of Dean became England’s first National Forest Park in 1938 and was included in post-War proposals for AONBs but not included in the 1971 designation of the

Wye Valley AONB because of its distinctive landscape and because it was deemed that the Forestry Commission had adequate powers for meeting demand for amenity and recreation under the 1968 Countryside Act. The Norfolk Brecks and the South Pennines have long harboured ambitions for AONB status, and other such areas are also emerging, such, as the Sandstone Ridge in Cheshire.

The National Association would support the request of local stakeholders and other bodies [such as the CPRE](#) for a review of these and other areas for which a compelling case could be made for designation as AONB or National Park.

An expansion of the area and of the geographical spread of AONBs would enhance their primary function of conserving and enhancing England's natural beauty (defined specifically to include wildlife and cultural heritage) and their *de facto* role (which should be recognised in statute as a second purpose) of promoting opportunities for understanding and enjoyment.

In relation to the possibility of existing AONBs becoming National Parks or securing Conservation Board status, form should follow function; a change in designation should be considered in those limited cases where this will clearly serve to improve the delivery of the purpose of designation.

In regard to the creation of new types of designation - for marine areas, urban landscapes, or those near built-up areas, form should follow function and there would seem to be little purpose in adding to the wide range of existing designations. Instead, priority should be given to strengthening the role, purpose, statutory protection and resourcing afforded to existing categories of designation and reviewing those areas to which they might be applied.

## **AONBs are learning landscapes and centres of innovation and creativity**

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

A common observation regarding designated landscapes from observers outside the United Kingdom is that UK National Parks represent permanence and authority in contrast to AONB traditions of partnership working and experimentation. While this probably overstates the differences which arise from their respective statutory purposes and functions – particularly in relation to spatial planning – the ability of AONBs to adapt proactively to local circumstances and challenges is important.

The statutory requirement since 2001 for the relevant local authorities for English and Welsh AONBs to produce management plans for their AONB areas has greatly strengthened the partnership working and effective management of AONBs in comparison to AONBs in Northern Ireland and National Scenic Areas in Scotland where no such formal requirement exists.

Internationally, UK National Parks and AONBs, once the 'poor relations' of the International Union for the Conservation of Nature family (IUCN) have secured a new prominence as 'Category V' cultural 'protected landscapes'. However they could achieve much more. For example in addition to protection of biological diversity, ecosystem processes and natural resources, [French Regional Parks](#) (Parcs Naturels Régionaux or PNR) are also explicitly

charged with enhancing and invigorating their cultural heritage, contributing to development planning, fostering economic and social development (including regional foods, agricultural and other produce), providing education and information and encouraging experimentation. Much of this takes place in English AONBs – but informally, dependant on individual voluntary initiative and has been hampered by cuts to local authority incomes and to core funding.

As proposed in responses to other questions, there are a number of ways in which AONB protection and management could be strengthened, particularly through a greater alignment with key features of British National Parks, for example by:

- Including the conservation and enhancement of wildlife and cultural heritage with that of natural beauty as a first purpose.
- Adding the understanding and enjoyment by the public of their special qualities as a second purpose and adding a social function in relation to sustainable development.
- Formalising the role of AONB partnerships in relation to their relevant local authorities and strengthening the role of the AONB management plan.

## ***A future vision for our national landscapes***

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

#### **AONBs are England's vital and treasured national landscapes**

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

The title AONB is well respected and understood amongst professionals. However despite promotional effort at local and AONB Family level, public awareness remains low especially in comparison to National Parks. 'AONB' is often seen as a primarily descriptive term; the (technical) meaning of 'natural beauty' is not widely understood and understanding and acceptance of the high level of protection is not widespread.

In general and despite the efforts of AONB teams and partnerships, AONBs are still under-delivering on their ambition, legislation and policies. Any rebranding of AONBs (for example as 'National Landscapes'), whether statutory or primarily promotional, should be matched by future proofing with a focus on enhancement and alignment with the principles of the government's 25 YEP. This should include a reaffirmation that both AONBs and National Parks have the highest status of protection together with a strengthening of the Section 85 duty of the CRoW Act to include a duty of 'due regard' accompanied by an obligation on all partnership members to support the objectives of the AONB management plan.

It is the view of the National Association that the AONB designation would benefit from rebranding, and that this can take place without legislative change. The National Association is well placed to co-ordinate the professional advice required to maximise the positive impact of a rebrand and host a major public consultation in this regard.

## Other designations are vital to delivery of AONB purposes

**Q 23. *The review has been asked to consider how designated landscapes work with other designations [...] Do you have any thoughts on how these relationships work and whether they could be improved?***

AONBs are multipurpose cultural landscapes accommodating wildlife, heritage, recreational opportunity as well as productive activities and they offer benefits beyond boundaries.

As suggested in the answer to Q20, we see no utility in the creation of new categories of designation although the number and/or area of AONBs might be increased in appropriate areas. However, the regulatory and policy framework of designated sites should be reviewed particularly in the context of a Britain outside the European Union.

Other designations are critical to the delivery of AONB purposes and AONBs support their management and delivery within a landscape context. The protection afforded to conservation sites (especially SSSI) is vital to enhance resilience and coherence of wildlife habitats and ecosystem processes in line with the ‘more, bigger, better and joined’ of the [Lawton Report](#).

Within AONBs the objectives of EU Birds and Habitats Directives designations (SPAs and SACs – the Natura 2000 network) are largely achieved through the protection afforded to terrestrial SSSIs. However SSSIs are limited to the jurisdictional limit of local authorities, generally Mean Low Water (MLW) although SSSI designation may in certain cases extend below this. AONBs need to be appropriately resourced in order to work at a spatial scale appropriate to specific needs.

Protection of archaeological and architectural heritage is critical to conservation of the special features of AONBs and the AONB Family supports any proposals from English Heritage for strengthening the protection afforded to Scheduled Monuments. The role of AONB partnerships in statutory development control and in local listing should be strengthened (see our response to Q14 above).

Recreational access is a *de facto* (and as proposed in the response to Q12 above should be a statutory) purpose of AONBs. Over 19,312 km of footpaths and bridleways pass through AONBs including 10 National Trails covering 1584 km. 2,940 km<sup>2</sup> of AONB land is Combined Open Country, Registered Common Land or Section 16 Dedicated Land – some 28.9% of the English total. These are vital elements in facilitating such access and should be kept under review and properly resourced alongside provision of good information to landowners, residents and visitors.

## Proposals for posterity

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

There is today a broad national consensus, reflected in the 25 year Environment Plan, around priorities for a healthy environment, landscape, culture and community life. The Designated Landscapes Review is timely and appropriate and the AONB Family is keen to play a central role in forging an England fit for the future. Since the end of the Second

World War, AONBs have served England well. With relatively simple legislative and policy changes they could do even better.

On behalf of the AONB Family the National Association's key proposals for AONBs are:

- The alignment of the purposes of England's designated landscapes to include:
  - the conservation and enhancement of wildlife and cultural heritage as a first purpose;
  - the understanding and enjoyment by the public of their special qualities as a second purpose.
- A formal duty in respect of sustainable social and economic development for all AONBs.
- A single remit letter to AONBs and NPs (and the National Association), signed by the Prime Minister, linked to the Defra grant.
- Acceptance of a diversity of local AONB governance models to reflect individual circumstances, with enhanced status through improved terms of reference and training for members and the use of national appointees.
- AONB staff teams should be given the capacity to play a leading role in the local delivery of agri-environment and new environmental land management schemes and to deliver action for climate change adaptation and mitigation.
- The National Association should be supported to explore the opportunities afforded by integrating the strategic activity of AONBs with that of the National Trails.
- Consider legislation that places a duty on relevant authorities to support the delivery of the AONB management plan.
- Accountability of AONB staff to their partnerships whilst retaining the existing local authority employer/ employee relationship.
- Adequate core funding and national support for individual AONB partnerships and delivery teams in particular to address vulnerabilities that arise through ongoing cuts to local authority budgets.
- Adequate core funding and national support for the National Association to build further collaboration across the designated landscape network and establish a data-based intelligence led landscape network.
- A hypothecated Sustainable Development Fund would enable AONB teams to better support community and business activity allied to the purpose of designation.
- A new statutory consultee status for Town and Country planning matters and encouragement of the production of dedicated Development Plan documents for AONBs where appropriate. Adequate funding of Town and Country planning activity so that designated planning officers can effectively manage major planning applications and fulfil their new statutory role.
- Retain the statutory designation of Area of Outstanding Natural Beauty but consider the informal rebranding of AONBs for marketing and awareness purposes.

And, for National Parks as well as AONBs:

- Strengthen the existing Duty of Regard through its replacement with a Duty of Due Regard.

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