



Submitted by email to: managementplan@northyorkmoors.org.uk

**North York Moors Management Plan
A response from the Campaign for National Parks (January 2022)**

Introduction

Campaign for National Parks is the independent national voice for the 13 National Parks in England and Wales. Our mission is to inspire everyone to enjoy and look after National Parks – the nation’s green treasures. We have been campaigning for over 80 years to ensure that our National Parks are beautiful, inspirational places that are relevant, valued and protected for all.

Campaign for National Parks brings together a wide variety of people and organisations to address issues affecting National Parks and take action to keep these beautiful places safe. We draw on a large pool of experts among our members, many of whom are actively involved in designated landscapes and their communities, across England and Wales and further afield. We also work closely with the individual National Park Societies in both England and Wales including the North Yorkshire Moors Association.

Management Plans are one of the key mechanisms that National Park Authorities have for furthering the statutory purposes of National Parks and enhancing their special qualities. We welcome the opportunity to respond to this consultation as we are keen to ensure that the North York Moors Management Plan is as effective as possible.

This Review is taking place at a time when the longer-term implications of the Covid-19 pandemic are still uncertain, but it is already clear that there will be significant impacts, such as changes to visitor behaviour and the local economy, which will need to be considered as part of the development of the final Management Plan. The NPA should also take account of the recent Government response to proposals in the Glover *Landscapes Review*, including the commitment to take forward proposals to strengthen Management Plans. We would like to see all such Plans setting out clear priorities and actions for nature recovery including, but not limited to, wilder areas and the response to climate change. NPAs should be starting to address these issues now rather than waiting for full implementation of the changes proposed by Glover.

We are generally supportive of the vision and outcomes for the North York Moors and many of the proposed objectives in the draft Plan. There is little in it that we would disagree with. However, there are a number of areas where we believe changes are needed in order to ensure that the Plan is as effective as possible. In particular, in line with our views on the need for stronger Management Plans, we would like to see the inclusion of much stronger, more challenging targets and a stronger emphasis on securing change as quickly as possible. We also believe that there are significant opportunities for expanding the Plan both with regard to the level of ambition proposed, and in terms of the range of issues addressed. We would encourage you to look at the draft Management Plan that the Brecon Beacons

NPA are currently consulting on¹. While this Plan could also benefit from the inclusion of more specific targets, it does cover the full range of issues that need to be addressed very well and also clearly sets out how the Plan's objectives will be delivered in partnership.

We have set out some more specific comments below.

Vision and priorities

Our vision is for National Parks which are beautiful and inspirational places enjoyed and valued by all. The vision for the North York Moors National Park generally aligns very well with this, particularly the emphasis on biodiversity and addressing climate change as this will contribute to making the Park a beautiful and inspirational place. However, we would like to see the inclusion of something aimed at ensuring more people are able to enjoy and value the Park. While there is a reference to the nation's health and well-being in your vision, neither the vision nor the key outcomes explicitly refer to visitors.

Given the scale of the nature and climate emergencies, we believe that the emphasis in the plan should be on nature recovery and climate change mitigation and adaptation, therefore outcomes 1, 2 and 6 should be priorities. However, these outcomes must be delivered in a way which conserves and enhances the special qualities of the National Park, so outcome 3 is clearly important too. It is also essential that the public have a good understanding of the climate and nature emergencies if these are to be tackled effectively. We would like to see the addition of objectives relating to engaging visitors and local communities and empowering them to take action on these issues as this would ensure that action on nature and climate was embedded throughout the Management Plan.

Outcome 1 – A resilient landscape at the forefront of addressing climate change

We support the NPA's emphasis on mitigating accelerating climate change as a priority for the Plan. The draft Plan refers to some of the impacts of climate change which are already being experienced but could helpfully include more detail on the effect this is having on the North York Moors specifically. Ensuring that both visitors and residents properly understand the significant impacts of the changing climate on the landscapes and special qualities of the North York Moors is key to addressing the challenge of ensuring that the National Park can play a significant part in achieving the regional ambition of being a carbon negative economy by 2040 as set out in **objective 1**. In line with the second purpose for National Parks, the Plan should aim to raise awareness and understanding of the impacts of climate change itself and of the way in which climate change adaptation and mitigation measures, such as changes in land management, will affect the special qualities of the Park. An additional objective should be included to address this either here or under Outcome 4.

Given the NPAs' ambitions to be leaders in tackling the climate emergency as set out in the NPE Delivery Plan, we believe there are significant opportunities for taking stronger action more quickly as part of the objectives set out under this outcome. For example, **objective 1** could include an earlier date for the National Park to be carbon negative as a way of demonstrating leadership. In addition, we believe the Plan should specify what achieving such a goal means in terms of the average annual reduction in emissions that will be required across the Park, and then set out the types of measures required to deliver this level of reduction. This would ensure that this objective is not only aspirational but also deliverable.

Given the importance of healthy peatlands for climate and nature, **objective 3** should be amended to refer to all degraded peatland being in restoration management by 2030, rather

¹ [Future Beacons: The Management Plan for the Brecon Beacons National Park 2022-2027 | Brecon Beacons National Park Authority \(beacons-npa.gov.uk\)](https://www.beacons-npa.gov.uk/future-beacons-the-management-plan-for-the-brecon-beacons-national-park-2022-2027)

than 2032. **Objective 4** needs to be made more specific, for example, through the inclusion of a deadline, and ideally milestones, for example, the area of soil to be improved by a specific date. In addition, a reference should be added to lobbying Government to secure the national policy framework needed to achieve the NPA's ambition on climate leadership. This should include seeking changes across a range of policy areas including planning (e.g. reducing permitted development rights) and transport (e.g. managing travel demand) and calling for NPAs to have the supporting tools and resources to enable them to take effective action themselves.

Outcome 2 - A more biodiverse landscape.

We agree that a more biodiverse landscape is important, but it is the quantity of common species that is important, as well as the diversity of species, so we suggest re-wording this outcome to read 'A more biodiverse landscape teeming with wildlife'

We support the reference in **objective 7** to restoring a "wilder and more naturally functioning ecosystem" to parts of the Park in future. In *Raising the Bar*, published in 2018, we recommended that there should be areas within the Parks that are managed less intensively and that feel relatively wilder. We also welcome the inclusion of the "Nature Opportunities Map" which provides a spatial representation of the opportunities for nature recovery in the Park. However, this map could usefully be supplemented by highlighting where the areas referred to in **objective 7** are located and how these relate to areas which are important for achieving other ambitions in the Plan such as public access. We recognise that it may not be appropriate or even possible to draw definitive lines on a map at this stage but an indication of the areas in the Park which could become relatively wilder would be very helpful.

Outcome 3 - A more beautiful and varied landscape where our key Special Qualities are conserved and enhanced

We support the objectives under this heading but would like to see the inclusion of an additional objective aimed at protecting and enhancing tranquillity, given how important this is to visitors to the Park as highlighted in the introductory paragraph for this section.

Outcome 4 – A place that lifts the nation's health and well-being

We are very disappointed that there is no reference under this outcome to supporting sustainable travel options. The draft plan notes that "Access to the countryside is... dependent on having a high-quality network of public rights of way" but fails to acknowledge that it is also dependent on good access by alternatives to the car. Our report [National Parks for all: Making car-free travel easier](#) includes examples of the kinds of measures that could be included such as demand responsive services. As we highlight in that report, around a quarter of households in England do not have access to a car and rely on public transport for most of their journeys.

Improved public transport will also be essential for achieving the Plan's ambitions on nature and climate while supporting more people to visit as set out in the objectives under this outcome. Many of those who would benefit most from the health and well-being benefits of National Parks are currently excluded from visiting by a lack of transport. Some of the proposed measures will need to be carefully designed to ensure that they both meet the needs of new audiences and do not undermine other important ambitions in the Management Plan or the special qualities of the National Park. For example, it will be important to develop the proposed opportunities to connect people with nature (**objective 11**) and increase access by underserved communities (**objective 12**) in a way that

minimizes carbon impacts as well as ensuring activities are available to those without private transport. We would also like to see some reference to the affordability of transport options as this has an impact on the accessibility of the Park for people from a variety of socioeconomic backgrounds.

Consideration should also be given to the role of sustainable travel in supporting recreational cycling (**objective 15**) and regenerative tourism (**objective 16**) by encouraging people to stay longer. We know that visitors are willing to see travel choices as part of their visitor experience in a way that residents are not and so promoting sustainable means of reaching high quality outdoor recreation experiences could play a role in helping to encourage people to extend their visits and use more local services. Research has also shown that people who use public transport tend to spend more money in the local area. There are, therefore, strong economic development arguments for investing in improved public transport for the National Park.

With regard to **objective 12**, we would like to highlight the research around people from minority ethnic backgrounds and lower socio-economic backgrounds visiting the outdoors that was undertaken as part of the Campaign for National Parks Mosaic programme. When tackling issues relating to increasing inclusivity and representation of marginalised groups, it is important to consider the impact of 'role modelling' in encouraging such groups to see activities as 'for them'. With this in mind, it would be good to see the inclusion of a reference to monitoring the diversity of the NPA workforce and measures that could be put in place, if necessary, to increase diversity. Visitors may be more likely to see the National Park as 'for them' if they can see people similar to them in the workforce.

We suggest the words 'and well-maintained' are added after 'well-marked' in **objective 14** as the condition of rights of way has a significant impact on people's enjoyment of the countryside.

Outcome 5 - A place of great beauty where local communities thrive

It is disappointing that none of the objectives under this heading cover public transport as the need for alternatives to the car is also important for local communities. The lack of public transport options is a particular challenge for the minority of households that don't have access to a car but also creates problems for all residents, both as a result of increased traffic and congestion from high levels of car use by visitors, and because of the more limited opportunities to choose sustainable travel options.

We are pleased to see the reference in **objective 17** to lobbying central government to agree to introduce a mechanism to control the conversion of existing housing to second or holiday homes. It would be helpful to include some information in the introductory paragraph about the impact of second homes on housing affordability in the National Park in order to provide the context for this. We support the ambitions to deliver more affordable housing set out in this objective. However, we would like to see the wording amended to make it clear that this is housing for local occupancy and that housing will not be built on inappropriate or environmentally sensitive sites. Retaining and enforcing occupancy conditions will be very important and opportunities should also be identified to add occupancy or primary residence conditions where appropriate.

We note that there is data on volunteering at the end of the plan but there is no reference to volunteering in the proposed objectives. This should be amended to ensure that the volunteering programme continues to get good support from all relevant partners. Not only will such a programme support the maintenance of the National Park and its recreational

facilities, but it will also contribute to the environmental awareness raising and knowledge sharing that is going to be so essential for tackling the nature and climate emergencies. We would be keen to see the inclusion of an objective which increased the opportunities for underserved communities to take part in volunteering opportunities and which seeks to address the barriers to volunteering that some people experience, such as a lack of awareness of opportunities, the cost of travel etc. Volunteering has significant potential as a route into employment for young adults and this issue could be usefully addressed too.

Outcome 6 - A place that supports a more diverse and flourishing net zero carbon economy

Surface transport currently accounts for a significant proportion of carbon emissions in the UK and transport measures will therefore need to be included as part of any plans for a net zero economy. As we've already highlighted there are other parts of the Plan where objectives on transport should be included but they should also be included here, or at least, there should be a reference to where the issue is addressed under other outcomes.

Delivering the plan

It is good to see the reference to partnership working in this final section of the Plan. However, given that nearly all the objectives in the Plan will rely on the support of other partners if they are to be delivered effectively, then this aspect needs to be integrated far better throughout the Plan, so that it is clear how, and by whom, the various objectives will be delivered. This will be even more important if the range of objectives to be achieved is to be expanded, as we believe it must.

For further information about any aspect of this response, please contact Ruth Bradshaw, Policy and Research Manager (email:ruthb@cnp.org.uk).