



Campaign for National Parks comments on Landscapes review: government response (31 March 2022)

Summary of our priority recommendations to Government

The pandemic experience has shown just how critical National Parks and AONBs are to the people of this nation. It has also highlighted the gaps in our current framework of support for these critical national assets. Despite the best and significant efforts of staff, volunteers and partners, our National Parks and AONBs are not being effectively managed for nature and could still deliver so much more to help tackle the climate emergency. There are significant inequalities in access to, and decision-making for, these areas.

We welcome the Government's vision and ambitions set out in its response to the Landscapes Review. We welcome the clear emphasis on nature and inclusion, and we support the vision for a "national network of beautiful, nature-rich spaces that all parts of society can easily access and enjoy". We are concerned that the proposals set out fall far short of what's necessary to drive transformative change and we therefore welcome this opportunity to respond to the proposals and offer our support to Government to develop the final policy recommendations and legislation.

We agree that legislative change is essential and urgent. We call on Government to set out legislation for National Parks and AONBs in the next Queen's Speech, to include:

1. Amending the purposes to give specific priority to nature recovery, climate action and equality and inclusion, and updating the Sandford Principle in line with the amended purposes, for all National Parks and AONBs.
2. Requiring all public bodies to further these purposes, with a requirement on National Park Authorities to identify and notify these other public bodies when developing Management Plans, coupled with an effective escalation mechanism.
3. Strengthening the Management Plans including by requiring the inclusion of targets.
4. Strengthening accountability by requiring the Secretary of State to set national targets, with timescales in which they should be achieved; produce regular strategic guidance; and sign off Management Plans. There needs to be a clear line of sight in legislative terms between the Management Plans and the new Office of Environmental Protection.
5. Strengthening scrutiny by giving Natural England a new role, akin to that of the UK Committee on Climate Change, to review, advise and report to parliament and the public on the adequacy of policies and plans to meet Protected Landscape targets.
6. Giving National Park Authorities much greater influence over transport planning and requiring all transport authorities to consider NPA requests for road charging schemes.

7. A ban on all burning on peatland in National Parks and AONBs, irrespective of peat depth.
8. A ban on the use of motor vehicles for recreational purposes on 'Green Lanes'.
9. Introducing controls on second homes and holiday lets including through the planning system, taxation and licensing.
10. Making it easier and quicker to establish new National Parks.

We welcome the prioritisation of nature recovery and climate action in Protected Landscapes. Such emphasis on the importance of these places must be reflected in overall Government policies on nature and climate, with appropriate targeting, funding, and weighting. The Environment Act statutory targets to halt biodiversity loss and recover nature must include explicit targets for Protected Landscapes. This should be coupled with targets and indicators to track progress holistically, including in relation to landscape character. Government should set clear expectations on what Management Plans should deliver for nature and climate. This should include more SSSIs and more achieving favourable condition, peatland restoration, catchment restoration, nature-friendly farming, natural regeneration, rewilding and new National Nature Reserves within Protected Landscapes. Better evidence and reporting on the state of nature in Protected Landscapes is essential and Management Plans must set out costed actions for nature recovery and nature-based climate solutions.

Environmental Land Management (ELM) is one of the most significant opportunities for achieving the ambitions for Protected Landscapes. **It is critical that ELM is designed and targeted to drive change in our Protected Landscapes**, recognising the special qualities and special challenges in these places. We encourage Government to set out a clear vision for agriculture and land management in Protected Landscapes. This should emphasise the importance of less intensive and nature friendly agricultural and land management practices, and the importance for access and enjoyment. As part of ELM, Government should develop a specific approach for Protected Landscapes, building on Farming in Protected Landscapes, that is designed to address the unique and special circumstances in these places over and above the rest of the countryside. This should have additional and integrated support, rewarding farmers and land managers that further the statutory purposes, deliver nature recovery, implement nature-based climate solutions, conserve and enhance the landscape and historic environment and manage better and greater public access.

We are deeply concerned that the **Government proposals on Landscapes for Everyone, fall far short of what is needed to drive change in equality and public health**. This misses a huge opportunity to deliver upon Government's levelling up missions. The framing as 'people as a problem' risks further exacerbating inequalities and polarisation. We urge Government to bring forward its proposed legislation reforms, alongside investment, including development of a compelling business case to secure cross-Government and Treasury support to deliver the quantum shift in inclusive access in Protected Landscapes needed for health and wellbeing. This should include public investment in new long-term programmes to increase the ethnic and socio-economic diversity of visitors, engage with young people, building on Campaign for National Parks' Mosaic programme, understanding how to better embed success and build clear targets and indicators into Management Plans. This should be accompanied by investment to support sustainable access from all parts of society, including better support for rural bus services and mechanisms to allow NPAs to use new ways of supporting alternatives to car use, such as road pricing.

There is an urgent need for improvements to governance of the protected landscapes to ensure that it is more effective, more focused on delivering the statutory purposes and more representative of the population. The proposals to improve performance should be introduced without delay and should be supplemented by strategic guidance reminding all those responsible for the governance of Protected Landscapes of the duties that apply to them in this role. We also want to see an increase in the proportion of Board members appointed on the basis of relevant expertise, including both an increase in the proportion of national members and the introduction of merit-based criteria for local authority appointments. We are opposed to proposals for greater flexibility over the proportion of national, local and parish appointments and for Secretary of State appointed Chairs.

We support the Government's proposals to strengthen Management Plans but believe that these need to go further. In particular, there is a need to ensure every Management Plan includes ambitious targets and an effective plan with timescales for delivering those targets. The new duties on other public bodies will help achieve this. But, to ensure all relevant bodies are playing an active role, there should also be a requirement on NPAs to identify, and notify, the organisations which are required to play a role in developing, and delivering, the Plan. There should also be requirements for the Secretary of State to sign off the final Plans, and for Natural England, to monitor and report on progress.

We agree with the Government that its ambitious new vision "must be matched by equivalent resources to ensure effective delivery". **We are concerned that proposals for sustainable financing will widen the gap between ambition and implementation.** Protected Landscapes will not be able to deliver proposals without additional Government investment and they will fail to leverage significant opportunities for private, philanthropic and partnership funding without it. We agree that the scale of investment needed is significant and that there is a clear role for all sectors to play. Consistent multi-year core funding is the critical foundation on which to build an ambitious finance model, to deliver returns 100-fold. Without that, the emphasis on private finance in the proposal is alarming as there are significant risks that can only be mitigated with the right government framework. Government has a crucial role to play: to stimulate market opportunities, including by making significant core investment; to direct and regulate markets to safeguard and mitigate risks and to ensure that investment is directed by Management Plans; and to ensure transparency and accountability to build trust and confidence in the financing system. Importantly, while there are developing markets for carbon, there is no payment for ecosystem services investment models for access, enjoyment, culture and heritage. The Government's proposals on Sustainable Financing fails to address how it will invest in these vital public goods. In any event we re-iterate that multiyear public financing is essential.

It is essential that the Government's final proposals fully recognise the criticality and urgency of public interest in our National Parks and AONBs, and set out how the Government will invest in and steward the recovery of these critical public assets. The founding National Parks and Access to the Countryside Act 1949 was hailed as a 'People's Charter for the Open Air'. The final Government response, new National Landscape Strategy and much-needed legislation should capture this spirit, setting out a new 'People's Charter' to transform Protected Landscapes in the national interest for health, equality, climate and nature.

Our detailed comments are below. Where relevant these reiterate and expand on points we have made in response to the online survey.

Our detailed comments

Introduction

This paper sets out our response to proposals in the government's response to the Landscapes Review¹. It builds on discussions with the National Park Societies and other members of our Council. We support government's ambitions set out in its response but strongly believe that a whole package of measures is needed to deliver the transformation envisaged, and the proposed partial implementation of the Landscapes Review recommendations falls short. As a matter of urgency, the Government must set out the required legislation in the Queen's Speech this year, to ensure momentum and enable implementation of important changes such as amending the purposes and strengthening the duty of regard.

Our comments focus primarily on National Parks, but we support the strengthening of Areas of Outstanding Natural Beauty (AONB) as a priority for Government.

The paper is structured using the same headings as in the government's response, using proposal numbers from the Glover Review.

Chapter 1: A more coherent national network

We support the Government's ambitions for a more coherent network of Protected Landscapes and the intention to set a clearer strategic direction for Protected Landscapes through a new national landscape strategy. This strategy must be ambitious and action-focused including cross Government commitments and actions that set out how the Government will invest in and steward the recovery of these critical public assets. More important and more urgent, are the proposals for new legislation: we urge Government to focus its immediate efforts on including this in the next Queen's Speech.

It is essential that a new national strategy recognises the significant public interest in our National Parks and AONBs, and that there are meaningful opportunities for the public, and organisational representatives, to shape this strategy. The founding National Parks and Access to the Countryside Act 1949 was hailed as a 'People's Charter for the Open Air'. New landscape strategy and legislation should capture this spirit and set out a new 'People's Charter' recognising the significance of Protected Landscapes to deliver in the national interest in terms of health, equality, climate action and nature recovery.

Strengthened AONBs

We support the commitment to new purposes and powers for AONBs. This must be coupled with additional resources to ensure all Protected Landscapes are able to deliver the new purposes and powers.

We do not have any objection to renaming AONBs as National Landscapes if that is what the AONBs agree is the most appropriate. However, we do have significant concerns about the potential confusion that could arise if the same term is used to refer to both one type of landscape designation (AONBs) and the two types (AONBs and National Parks) collectively. For example, it would be inconceivable that Government would currently be proposing to call a new national partnership for AONBs and National Parks 'the AONBs partnership', yet that

¹ [Landscapes review \(National Parks and AONBs\): government response - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/consultations/landscapes-review-national-parks-and-aonbs) The review team's final report is available here: [Landscapes review: National Parks and AONBs - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/consultations/landscapes-review-national-parks-and-aonbs)

is precisely what is being proposed under the new nomenclature. If 'National Landscape' is to be adopted as the new term for AONB, then the term 'Protected Landscape' should be used when referring to both designations collectively and, for example, the proposed new national partnership should be called the Protected Landscapes partnership.

Above all, it is critical that the changes, including any rebranding, do not in any way lead to any reduction or undermining of the existing purposes and powers and resources for both National Parks and AONBs.

Strategic direction

National landscapes partnership

We believe a new body is needed and we are broadly supportive of the idea of creating a new body which builds on the existing collaboration between National Parks England and the National Association of AONBs as well as other key partners such as the National Trails. However, we are concerned that the partnership proposed here amounts to little more than existing arrangements and the focus is too narrowly drawn around fundraising. For any partnership to deliver the transformation required it needs capacity, independence, authority, and clear terms of reference to deliver across the purposes in order to act as a champion and challenger for Protected Landscapes across Government, as well as externally.

If the new body is going to add value to existing arrangements, it will need:

- A founding principle to ensure that the public, and organisations representing a diverse range of interests, have opportunities to contribute to the work of the partnership, ensuring greater focus and relevance to the public interest.
- A remit to set out a clear vision and strong ambitions for the role that Protected Landscapes should play in addressing the climate and ecological emergencies, and inclusivity and equality of access and participation, reflecting revised new purposes.
- Leadership and sufficient influence to generate action and resources from all relevant government departments, especially Levelling Up, Housing and Communities, Health, Transport, Business, Energy and Industrial Strategy and Education. This should include ensuring all relevant organisations are brought in at a national level to furthering the purposes and helping to develop and deliver effective Management Plans.
- Resources, including a staff team, and access to the appropriate skills and expertise to ensure it can deliver its responsibilities effectively. This should include capital funds for exemplar pilot and learning projects (e.g. learning from Tirweddau Cymru Landscape Wales, which is a partnership of five AONBs and three National Parks, coordinating an £8 million project fund).
- Independence from Government to be able to act as a national champion for Protected Landscapes, both within and outside Government.
- An independent Chair. This role is a critical one and needs to be carefully and transparently defined and recruited for, taking special account of the current lack of diversity in Protected Landscapes.

We have concerns that proposals are developing at pace for this new partnership 'behind the scenes'. This perpetuates the existing problems in relation to equality and inclusion. Who is involved, and who is excluded, even at the early stages of design is critical. We are concerned that the focus on fundraising, almost at the exclusion of everything else, is a result of the 'club' developing early proposals. We welcome the recognition from Government that it is critical that *"for Protected Landscapes to benefit all parts of society, their boards must better reflect that society"*. This is equally true at the national level. With

this partnership, the Government has an important opportunity to set a clear and different tone to embed diversity, equity and inclusion, as well as new ways of doing things in the partnership for nature and for climate. Whilst the partnership needs to be tight in terms of leadership, there are robust ways to bring in diverse citizen voices into development and design of the partnership, with a track record of such approaches across Government. Campaign for National Parks is happy to advise and support in this regard.

The national partnership needs to be accountable to Government and ultimately Parliament, i.e. to ensure that what it raises money for, and what it delivers, are what is most needed to further the purposes of Protected Landscapes. We do have significant concerns that a new, voluntary partnership is not constitutionally able to deliver the much-needed accountability functions at a national level and hold the landscape bodies accountable for delivery of their Management Plans, and ultimately the Government accountable for delivery against its vision. We therefore believe it is critical that Government sets out new accountability functions, with a clear line of sight between development of Management Plans, Natural England, Defra and the new Office for Environmental Protection. We propose new legislation to underpin these arrangements which is set out in our comments on Management Plans below.

Natural England's role

We welcome the commitment to reinvigorating Natural England's role as the statutory adviser on England's landscapes. It is essential that this is considered in relation to the nature, climate and the public health, enjoyment and equality aspects.

If Protected Landscapes are to deliver more for landscape, nature and people, Natural England must be able to take a strategic overview of nature and landscape and people's engagement with it; ensuring they are addressed effectively. This means that Natural England must have the appropriate resources and remit to enable the organisation to provide landscape, nature and public access with the same level of priority, including clear statutory responsibilities for landscape protection and enhancement; the review of Management Plans; and monitoring and enforcement of the delivery of those Plans. To do all this effectively, Natural England will need sufficient, long-term public funding.

We note in statute that Natural England's role is drawn generally, in terms of a purpose "*(2b) conserving and enhancing the landscape,*" and specifically related to designation of National Parks and AONBs. Whilst this does not prevent them acting more proactively to ensure delivery of nature, people and climate objectives in Protected Landscapes, we have seen in practice, under austerity, the lack of specific powers and duties in relation to the ongoing management of National Parks and AONBs has led to significant reduction in this area of work. We welcome the renewed emphasis and energy on landscape from Natural England (e.g. as manifest in its new Landscape Advisory Panel). We recommend supporting this continuing 'emboldened role' through updating legislation. We propose a system, drawing on the mechanisms under the Climate Change Act 2008:

- Under that Act, the Government sets the UK carbon budget and policies to meet that budget, but the UK Committee on Climate Change, advises on progress, whether the budget has been met, the adequacy of policies to meet the budgets, future emissions targets and how the budget is to be put back on track etc in the next budget cycle etc.
- By analogy, we recommend that the Secretary of State sets national targets for Management Plans with statutory guidance on how Protected Landscapes are expected to support those. The Protected Landscape bodies then develop the Management Plans which are signed off by the Secretary of State.

- At the end of each period, Natural England publicly reports on progress against targets and makes recommendations to the National Park Authority / AONB partnership and to Government on what is needed to improve matters going into the next period.
- There is then a duty to follow the recommendations in developing the next set of guidance and plans.

It is notable that the Government's response only makes a very brief reference to NE's role in the designation process. This is very disappointing given that we urgently need to see significant improvements to the process for identifying and designating new Protected Landscapes or making changes to the boundaries of existing ones. This process needs to be rigorous, but it should be quicker and far less resource intensive than it is currently. NE should take a far more pro-active and urgent approach to identifying where new areas are to be designated and then designation of those areas should be secured in a timely manner. To achieve this NE must have the necessary structures, resources and specialist expertise to allow them to undertake designation efficiently and effectively. Ministers must also play their role by making final decisions on designations as quickly as possible. Where a strong and well evidenced case for designation has been made for a new National Park or extension to an existing Park such as the extension to the southern boundary of the Lake District, it should be for NE to justify why that particular designation is not appropriate and if there is no good reason for not proceeding then they should begin the designation process.

New designations

We are keen to see the creation of new National Parks but these must be created under the same model as existing ones. We would not support any changes to elements of the existing legislation which are central to delivering the National Park purposes, such as NPAs' planning powers. In addition, all new designations must be accompanied by appropriate new funding, and a commitment to funding in future years at a level which will enable all Protected Landscapes to fully achieve their purposes and to ensure that there are no detrimental impacts on the existing Protected Landscapes. Existing protections should be maintained and strengthened for both existing, and new Protected Landscapes, in order to ensure that they are able to deliver their statutory purposes effectively.

In terms of identifying a wider network of designations, particular attention should be given to restoring landscapes which could lead to the creation of future National Parks, in areas where there are significant gaps in the existing network of designated landscapes in terms of both public accessibility and ecological connectivity, and where there are particularly rare or threatened habitats. These areas should be clearly identified as part of a wider Land Use Strategy and/or National Spatial Plan and afforded additional protection in recognition of their potential future status.

A unified mission

We are supportive of ensuring that the purposes of National Parks and AONBs are more closely aligned. It is essential that the Sandford Principle or an appropriately updated version of it must continue to apply in National Parks and should be extended to the AONBs i.e. the first purpose must have precedence where there is a conflict between them. We recognise that there are differing views on this among local stakeholders, but our view is that it would be consistent with the principle of aligning all the Protected Landscapes more closely for the Sandford Principle to now be applied to The Broads as well.

Chapter 2: Nature and Climate

We welcome Government intention to put our Protected Landscapes at the heart of delivering for nature recovery and climate. This should be reflected fully in both priorities for Protected Landscapes, as well as Government's overall priorities for nature and climate. For example, it is essential that all Government's policy tools for halting biodiversity loss, are explicit about the importance of their use in Protected Landscapes, with appropriate weighting and targeting mechanisms.

The Nature Green Paper makes clear the scale of the challenge we face to meet Government's statutory commitment to halt biodiversity loss and contribute to international commitments to protect 30% of land for nature by 2030. It also makes clear, that under current legislative and management arrangements Protected Landscapes cannot deliver their potential for nature nor be counted towards 30x30. It is therefore vital that the legislative and management reforms suggested in this response are progressed with urgency, alongside critical investment now, in order to deliver ahead of 2030. Protected Landscapes include half of protected sites and are crucial to deliver bigger, better and more joined up nature networks. It is vital that reforms from the Green Paper and the Landscapes Review are progressed together. The Green Paper also proposes reforming arrangements for Defra's Arm's Length Bodies. It is vital that the Protected Landscapes function, and the vision set out by Julian Glover in his review to ensure national leadership and accountability are prioritised as part of this review.

The Nature Recovery Network and 30x30

We agree that at present, under their current statutory purposes, level of protection and management, Protected Landscapes cannot be said to contribute towards 30 by 30 in their entirety. However, we do not currently have a clear view of the state of nature in our Protected Landscapes, nor the measures needed at scale to halt and reverse biodiversity decline. This, along with updated legislation, is urgently needed to do more to drive recovery of nature.

We believe that, if the contribution of National Parks to the Nature Recovery Network is to be maximised, NPAs should always be the responsible authority for the Local Nature Recovery Strategies (LNRSs) for their area, since there are significant opportunities to build on the approach that NPAs already use for developing their Management Plans. We are disappointed that Government has not chosen this option even though the legislation allows for it, as it will mean most National Parks are split between two or more LNRSs and will reduce the opportunities for ensuring a good alignment between the LNRSs, the Local Plan and the National Park Management Plan.

The best way of ensuring successful LNRSs in National Parks would be to make NPAs the responsible authority. If NPAs are not to be the responsible authority, then it is absolutely essential that they have a role in the governance structure of relevant LNRSs and that those LNRSs are required to further the purposes of the National Park and take account of the priorities and actions in the Management Plan. There should also be a requirement for responsible authorities to take account of the Management Plans for any National Parks adjacent to their area and to involve the relevant NPA in the preparation of the LNRS.

A stronger mission for nature's recovery

We welcome the Government's support for Glover Proposal 1 to amend the first statutory purpose. It is essential that the final wording agreed for the amended purposes does not result in any reduction in the status and standing of the Parks, including at an international

level. For that reason, we recommend the adoption of the following principles with regard to the language and definitions to be used when amending the purposes:

- The purposes, when combined with the Sandford Principle, send a clear signal of prioritisation and supports resolution of conflicts.
- Nature, landscape and natural beauty are the priorities. These should be clearly defined in the legislation drawing on internationally agreed definitions, appropriately updated where necessary e.g. to ensure that something cannot be ‘naturally beautiful’ if it a) damages natural ecosystems and b) hinders nature recovery.
- There should be a specific reference to landscape. Although landscape protection and enhancement has always been an important role for designated landscapes this has not previously been referred to as part of their statutory purposes. However, the UK became a signatory to the European Landscape Convention (ELC) in 2007 which commits the Government to take action to protect landscape of heritage quality. The ELC also provides an internationally agreed definition of landscape² which can be incorporated into legislation, thus overcoming previous concerns about the term being too vague. Importantly, the UK’s commitments under the ELC are not affected by Brexit as it is a Council of Europe convention.
- The word(s) used to strengthen support for nature recovery in the conservation purpose must also take account of existing national and international definitions and commitments. The current purpose refers to ‘wildlife’ and Glover proposes using the word ‘biodiversity’. However, the IUCN’s internationally agreed definition of a protected area places a strong emphasis on ‘nature conservation’ which is defined more broadly than ‘biodiversity’³.
- There should continue to be a reference to ‘cultural heritage’. ‘Cultural heritage’ should be defined in a way which makes it clear that it cannot be used to support cultural and traditional practices that are directly causing biodiversity loss or hindering nature’s recovery, such as the burning of peatland.
- The purposes should include a specific emphasis on tackling climate change in terms of both adaptation and mitigation (as identified in our 2021 report on *National Parks and the Climate Emergency*⁴.) The purposes, coupled with the Sandford Principle, should emphasise the need to deliver climate action in ways that also deliver for nature, for example natural regeneration of woodlands and natural flood risk management.
- The first purpose must have precedence if there is a conflict between the purposes so the Sandford Principle should be strengthened and must continue to apply and should be extended to The Broads, as set out above.

² The ELC defines “landscape” as “an area, as perceived by people, whose character is the result of the action and interaction of natural and/or human factors” (Article 1a).

³ The IUCN defines “nature” in the context of protected areas thus as follows: “nature always refers to biodiversity, at genetic, species and ecosystem level, and often also refers to geodiversity, landform and broader natural values”.

⁴ [New Report: National Parks and the Climate Emergency | Campaign for National Parks \(cnp.org.uk\)](https://www.cnp.org.uk)

We propose the following wording for amended statutory purposes:

“The provisions of this Part of this Act shall have effect for the purposes—

- (a) of conserving, enhancing and actively restoring landscape, nature and natural beauty in these areas;
- (b) of securing opportunities for climate adaptation and mitigation;
- (c) of conserving and enhancing cultural heritage in these areas; and
- (d) of enhancing equality and physical and mental health by increasing opportunities for all parts of society to understand, visit and enjoy the special qualities of these areas.

And if it appears that there is a conflict between any of the purposes, then greater weight must be given to the first of these purposes”.

Consideration also needs to be given to amending the purposes to the Broads to bring them into closer alignment with the purposes of other Protected Landscapes. The Broads currently has a third (navigation) purpose, but this is out-of-date and needs to be revised as the waterways here are no longer used for cargo traffic.

Setting ambition and monitoring progress

We welcome the Government’s commitment to agreeing new ambitious outcomes for Protected Landscapes and improving the monitoring and reporting of these outcomes. This is urgently needed. Our [Raising the Bar](#) report in 2018, showed that there is a dearth of evidence and data on the state of nature in National Parks across different biomes, especially beyond SSSIs. The report highlighted that the reasons for biodiversity loss in the Parks is not well articulated and understood, and different approaches are taken in terms of detailed objectives, policies and strategies for halting and reversing declines in wildlife and the improvement of degraded habitats. There has been progress since 2018, (for example the state of nature as set out in the Management Plans for the Lake District, Exmoor and Brecon Beacons) but not at a sufficient level of detail and at the scale needed.

The Environment Act (2021) requires Government to set statutory targets to halt biodiversity loss and recover nature. These statutory targets must include explicit targets for nature recovery in Protected Landscapes. In addition, there needs to be an overall suite of targets and indicators to track progress nationally, and we welcome the proposal for an outcomes framework to underpin and support development of management plans locally and provide accountability for progress at a national level.

We support the development of an outcomes framework which includes both quantitative and qualitative indicators. It is essential that the way in which this is implemented does not result in certain activities being inadvertently deprioritised because they are not covered by the proposed suite of environmental outcomes and/or they are areas where it is much harder to quantify progress. For example, there is a need to ensure that appropriate indicators and metrics are developed to monitor changes in landscape quality. It will be important to ensure that there are clear goals set across the purposes, for all relevant issues in order to ensure that there is good progress across the full range of desired outcomes. This should include:

- The overall proportion of land in Protected Landscapes that must be effectively managed for nature to deliver against 30x30 e.g. land that is managed for peatland restoration, catchment restoration, nature-friendly farming, rewilding and nature reserves.

- A target for more SSSIs and more achieving favourable condition.
- Landscape Character.
- Public enjoyment and other access measures, with specific measures to track equality, diversity and inclusion.

We welcome the emphasis here on setting ambitious goals to increase carbon sequestration and the requirement for Management Plans to set out a local response to climate adaptation. These are both urgently needed but if they are to be effective, they will need to be backed up by changes which ensure there is a statutory requirement for all relevant bodies to be taking appropriate climate action (see our comments above on changes to the first purpose).

Agricultural transition

Environmental Land Management (ELM) is critical to bringing about the transformation for nature that's needed. It is essential that ELM is designed specifically to further the purposes of our Protected Landscapes, recognising the special qualities and special challenges in these places, over and above the wider countryside.

We welcome Government's proposals and encourage it to go further, by setting out a clear vision for agriculture and land management in Protected Landscapes. This should emphasise the importance of less intensive, regenerative and nature-based agriculture and land management; sustainable, local and artisan food; restoring traditions, such as hedge laying, where traditional techniques support nature recovery and developing economies to support those traditions; and diversification including the role of eco-tourism. We also need to recognise rewilding as a legitimate and beneficial land management choice which can be integral to this. Given that National Parks are so important for recreation, there should be specific emphasis on how farmers and land-owners can be encouraged, supported and rewarded for managing better and greater access, with less impact.

We welcome the Government's commitment to building on the lessons from the Farming in Protected Landscapes (FiPL) programme. The feedback we have had is that the FiPL programme is a good foundation on which to build. The model of integrating local objectives for nature, climate, access and landscape character, based on the Management Plan, has been particularly well-received. As are the principles of in-person advice, farmer-voice and co-design, with a deepening of the relationship between NPAs and land managers, through participation in decision making and farmer clusters. We would like to see a full evaluation with what works replicated in the design and delivery of future Environmental Land Management (ELM) schemes in Protected Landscapes.

We think there is a clear case for Protected Landscapes to receive support via ELM over and beyond that in the rest of the countryside. These places have been designated by virtue of their outstanding special qualities for nature, natural beauty, public access and enjoyment and cultural heritage. This should be reflected in ELM, with the scheme designed in a way to further the purposes. This could be achieved either through the weighting and targeting mechanisms in ELM, or through a continuation of an additional scheme such as FiPL as part of the ELM framework. We urge Government to give special attention to public access aspects, as Protected Landscapes have 100s of millions of visitors each year and land managers need to be supported to welcome and open access as well as manage impacts. Options related to this have been largely removed from recent agri-environment schemes, and land agents and advisors currently have very little experience in this area: time and investment is needed to build capacity and capability and its crucial to get this right to avoid escalation of insider-outsider polarisation experienced during the pandemic.

Government must increase the level of financial support available through ELM for both National Parks and AONBs to ensure these areas can become exemplars for nature, climate and access. There should be consistent and targeted support for sustainable farming practices which support nature recovery, reduce climate impacts, increase public access and enhance landscape character. NPAs should have a clear role and the autonomy to direct payments in accordance with the management plan.

We also encourage government to expediate the phasing out of damaging and intensive land management. This should include a ban on all burning on peatland in National Parks and AONBs, irrespective of peat depth.

A final note on climate change

Despite the title of the chapter, there is very little detail and few proposals on the role of the Protected Landscapes in tackling the climate emergency. We recommend Government reviews our recent [report](#) to consider further how to support Protected Landscapes in implementing nature-based solutions, practical actions such as [banning plastic tree guards](#), low carbon transport and understanding social and physical climate vulnerabilities and adaptation. Our Protected Landscapes will radically change through direct and indirect climate impacts. It's important that these changes are discussed with landowners, visitors, stakeholders and others, which is why we are calling on the Government to establish People, Nature and Climate commissions to understand and negotiate change in our National Parks.

Chapter 3: People and place

We agree with the Government that changes are needed to reduce inequalities, improve access and support local economies. However, we are concerned that the proposals set out miss some of the most important proposals set out by the original Landscapes Review. The framing of the response in parts of this chapter - 'people as a problem' - is deeply concerning, and risks exacerbating existing inequalities and causing further damaging polarisation between residents and visitors. We urge Government to bring forward new and additional proposals that are far more ambitious, in keeping with both the spirit of the original National Parks and Access to the Countryside Act, and the proposals of Julian Glover's Review.

Landscapes for everyone

The Government proposals fall far short of what is needed. We are particularly concerned that there has been no real progress on the following:

Proposal 8: A night under the stars in a national landscape for every child

Proposal 9: New long-term programmes to increase the ethnic diversity of visitors

Proposal 10: Landscapes that cater for and improve the nation's health and wellbeing

Proposal 13: A ranger service in all our national landscapes

We understand that this may be due to the failure to produce a compelling business case to secure cross-Government and Treasury support to deliver a quantum shift in people's access to National Parks and AONBs, as a means to realise well-evidenced health and wellbeing benefits.

We recommend that Government specifically sets out a programme to build that compelling business case. This should include:

- A principle that the general public, including diverse communities, and organisations representing their interest, have the opportunity to contribute, to ensure that the programme speaks to lived experience.
- A research programme, that fully understands the barriers to implementation and delivery within Management Plans to realise the significant benefits to health and levelling up, and systemic barriers to access.
- Extension of funding for Generation Green and other exemplar long-term projects, including re-visiting the Campaign for National Parks' Mosaic programme, which was supported by Government, Natural England, the Heritage Lottery and NPAs, to understand how to better embed and sustain important and ground-breaking work.
- A round of the Natural Environment Investment Readiness Fund that is explicitly focused on stimulating investment via cultural ecosystem services.

In the meantime, further government investment is critical. Because, unlike carbon (and to a certain extent, nature recovery), there is no 'private or blended finance' model that could deliver these important public health and equality objectives. Investment in the infrastructure of authorities, is essential for increasing volunteers (including volunteer rangers) and stimulating sustainable tourism.

Like the proposals for nature and climate, National Parks and AONBs should have explicit targets, and expectations for outcomes related to access and equality. This should include ambitious proposals put forward by the Landscapes Review, including

- Children's engagement (the proportion spending 'a night under the stars' is a good starting point).
- Ethnic and socio-economic diversity of visitors.
- The number of rangers (volunteer and employed).

Whilst the new partnership's national co-ordination function is welcome and should increase the Protected Landscapes bodies' capacity to plan and promote engagement events, it is essential that the remit ensures inclusivity. It is extremely disappointing that there is no mention of how such activity will be funded. We would like to see a commitment to supporting new long-term engagement programmes similar to the Campaign for National Parks' Mosaic programme, which successfully introduced thousands of first-time visitors to the National Parks. The Glover Review identified such initiatives as a priority for future support.

If people from all parts of society are to benefit from the special qualities of the National Parks, the NPAs need to be able to take a more proactive approach to seeking out people in their home locations and supporting them to visit the Parks. This should include outreach, and engagement in the urban areas close to Protected Landscapes. Consideration must also be given to how people can be supported to visit in future under their own steam. This means that additional funding is needed for both engagement activities, and for measures needed to support them, including improved public transport. Without this, it is impossible to claim that these are landscapes for everyone. In addition, National Park Cities and other urban landscape initiatives, should be progressed and used as a way of connecting people with the spirit of National Parks when at home.

A stronger mission for connecting people and places

We support the principle of amending the second National Park purpose to ensure that it gives stronger support for equality and inclusion and connecting people to nature. We agree that this strengthened purpose should be extended to AONB teams. We particularly welcome having clear reference to health and well-being and improving opportunities for all parts of society to visit in the amended wording. This should build on the Equalities Act, recognising that there is a need to tackle inequality, with positive action to address racism, classism, sexism and homophobia for example, as well as provide ‘access to all’. In addition, we would like to see the retention of a reference to special qualities as included in the current wording because this provides a locally distinctive element to the purposes and a clear link to the specific qualities of an individual Protected Landscape. As set out above, additional investment will be required to ensure that this new statutory purpose can be delivered effectively. The specific wording we propose is set out above in the section on the first purpose.

Supporting local communities

We welcome the Government’s decision not to take forward Glover proposal 17 as we do not believe there is any need to change the socio-economic duty into a third purpose. As the Government’s response highlights creating a socio-economic purpose potentially risks undermining the other two purposes. It is also worth bearing in mind that this idea is one that has been considered and rejected in a number of other reviews of Protected Landscapes dating back to the Edwards ‘Fit for the Future’ review in 1991.

We do believe that this socio-economic duty is important for securing the future of National Parks and AONBs. We would therefore expect Government to set out the expectations for Management Plans to set specific objectives for delivery against this duty. However, it must continue to be clear that the duty should be applied only in pursuit of the purposes as is currently the case in order to ensure that it is not used to justify inappropriate development.

Sustainable transport

We are concerned that the measures included in this section, while welcome, are far too limited in scope to have any real impact. Given the introduction to the Government response highlights the need to address climate change, it is very disappointing that there are no proposals to help reduce the carbon emissions associated with transport in Protected Landscapes, particularly those resulting from visitor travel. The Climate Change Committee’s latest report to Parliament⁵ highlights that surface transport has been the highest-emitting sector in the UK since 2015 and that delivery of the sixth carbon budget will require substantial progress to address this in the coming years, including an increased focus on walking, cycling and public transport as well as support for electric vehicles. This must be taken into account as part of the Government’s future plans for Protected Landscapes.

The most significant proposal here is the pilot of new ways of coordinating public transport in the Lake District, and we understand that this is dependent for its implementation on the agreement of Cumbria County Council and that this has not yet been confirmed. If this is to become a “blueprint for other Protected Landscapes” as the response suggests, then the Government needs to work with the Lake District NPA and the County Council to ensure it happens. If NPAs really are going to have a greater influence over transport in their area, then legislative changes are required to allow for the setting up of formal Transport Partnerships between the NPA and the local transport authorities in the area i.e. the

⁵ [Progress-in-reducing-emissions-2021-Report-to-Parliament.pdf \(theccc.org.uk\)](https://www.theccc.org.uk/wp-content/uploads/2021/06/Progress-in-reducing-emissions-2021-Report-to-Parliament.pdf)

formation of a sub-national transport body covering the National Park. This would give the NPA a formal role in the governance and decision-making on transport for the area, including the development of the LTP and other relevant plans and strategies such as the Bus Service Improvement Plan, as well as more influence over the associated funding. However, this approach would only be possible where the relevant transport authorities agree to it so there is also a need to strengthen the requirements relating to Local Transport Plans, as set out below.

We support the proposal to update Local Transport Plan (LTP) guidance to emphasise the need to consult with NPAs but if this is to have any real impact there needs to be a statutory requirement both for local transport authorities to consult NPAs in, or close to, their area when developing their LTP and for these LTPs to be required to further National Park purposes. There will also need to be equivalent statutory requirements relating to the transport strategies developed by sub-national transport bodies. Such measures would help ensure local transport authorities address the issues that NPAs raise when consulted. The Government suggests that strengthening the statutory purposes and the duty of regard should ensure this happens and it is essential that these changes happen, and that the new duty is made strong enough. However, this alone will only have a limited impact because local transport authorities have such limited funding available to support bus services and other local transport improvements. For example, it has recently been highlighted that there is a significant shortfall available in the funding for the National Bus Strategy⁶. If the Government really wants to ensure there is more sustainable transport in Protected Landscapes, there will need to be dedicated funding provided for this as well as support for measures to generate alternative forms of revenue.

Our car-free travel report, *National Parks for all: making car-free travel easier*⁷ identified 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](#) in the Yorkshire Dales which allows on-demand shared journeys to be booked via an app and [Bwcabus](#) 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.

There is therefore an urgent need to identify 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. This means there is considerable potential to experiment with approaches such as road pricing in National Parks, particularly, 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.

The growing numbers of visitors and the increasing awareness of the negative impacts of high levels of car use mean the time is now right to test the introduction of road pricing in National Parks. The Government should also be providing more support and encouragement for NPAs 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 NPA

⁶ [Analysis reveals billions of pounds shortfall in National Bus Strategy plans | CPT \(cpt-uk.org\)](#)

⁷ [National Parks for all: making car free travel easier | Campaign for National Parks \(cnp.org.uk\)](#)

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 are very disappointed that the Government has not used the response to the Glover Review as an opportunity to test out more radical approaches to tackling the growing problems of parking and congestion in National Parks and would like to see much stronger support for NPAs to introduce road pricing, or other transport demand management measures such as selective road closures. This should include amendments to the Transport Act 2000 to require relevant transport authorities to implement any reasonable requests for road pricing received from NPAs and to allow the money raised to be used to support National Park purposes.

The proposed pilot in the Lake District should also be expanded to incorporate a wider range of measures along the lines of the 'smarter travel National Park' pilot we recommended in our car-free travel report. In particular, it should incorporate some form of demand management and should test new types of on-demand shared transport services such as Vamooz or Bwcabus alongside 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.

Even where there is good public transport available, the cost can be a significant barrier to visiting National Parks for those without cars. This also has a significant impact on the socio-economic well-being of local communities, making it harder for businesses in National Parks to attract employees and for local people to gain, and retain, employment particularly where most of the jobs available are low paid, as one Lake District resident highlighted on social media recently⁸.

In order to deliver an effective and affordable bus 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 areas⁹. 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*¹⁰.

Open access land

There are significant opportunities for increasing the amount of access land available in our Protected Landscapes. We welcome the Government's commitment to reviewing open access maps, but we are disappointed that there is no deadline given for this. We would like

⁸ [Beth Windle on Twitter: "I want this thread 🗨️ to get to the right people. I want to talk to a @lakedistrictnpa representative or someone who is happy to have a meeting and hear me out. I'm Beth Windle. I work a regular 9-5 job in Keswick. I work 5 days a week on minimum wage. https://t.co/brT9gcsQfi" / Twitter](#)

⁹ [The Scandinavian way to better public transport | URBAN TRANSPORT GROUP](#)

¹⁰ [160120 Building a world-class bus system for Britain FINAL1 \(transportforqualityoflife.com\)](#)

the Government to commit to completing the review of open access maps by 2024/25 at the latest, so that the additional recreational opportunities provided by expanding access rights can be delivered as soon as possible. This review should cover the need to increase the amount of and accessibility to open access land in areas such as the South Downs where there is currently very little, as well as examining the opportunities for increasing the accessibility of existing access land, including creating links between isolated pockets to ensure there is a cohesive network of paths and access land available.

National Trails

We agree that National Trails should be more joined up with our Protected Landscapes. They also offer significant potential for increasing the accessibility of Protected Landscapes from urban areas. We would like to see the creation of a series of routes to link the long-distance National Trail network to towns and cities and to provide links between the Protected Landscapes, allowing for more people to explore further and supporting easier car-free access across each of our Protected Landscapes. We would like to see new National Trails along rivers, which historically have had very little public access, but which provide an ideal opportunity for connecting people and nature from town to countryside. A network of trails connecting urban areas with the Protected Landscapes will increase opportunities for more people to access the natural environment sustainably and with confidence.

Managing visitor pressures

Enforcement powers

We are extremely disappointed that the emphasis in this section is solely on penalising visitors. NPAs should not, and do not want to, rely on enforcement powers to help manage visitor pressures. Using these powers would divert resources from other more constructive ways of dealing with visitor pressures. The focus should instead be on positive access management, visitor engagement and education and supporting responsible behaviour. Enforcement will promote confusion amongst the public, and risks undermining the amended second purpose by alienating those who currently feel less confident about visiting Protected Landscapes and who are most likely to be deterred by the threat of enforcement measures. There are other more effective ways of addressing the challenges of high visitor numbers and helping people to understand and enjoy the landscapes responsibly. These include a properly resourced ranger service as proposed in the Landscapes Review (proposal 13) and increased support for disseminating and promoting the Countryside Code. This focus on penalising the small proportion of visitors who behave inappropriately, risks distracting from other damaging impacts of high visitor numbers which also need to be addressed. There is a particular need to address the high levels of car use among visitors as we discuss above.

Green lanes

We would like the Government to bring in legislation to ban the use of motorised vehicles on green lanes in Protected Landscapes. This has been a significant problem in a number of the National Parks for some time now, damaging their tranquillity and natural beauty and creating a nuisance and source of danger for non-motorised users of these routes and local residents. The increased emphasis on nature recovery and the health and well-being benefits of National Parks means it is even more important than ever that NPAs are able to address the damaging impacts of recreational motoring.

The Campaign for National Parks report, “*Off-road or Off-limits?*”, published in 2005, showed high level of support for NPAs to be given powers to make Traffic Regulation Orders (TROs) on green lanes. It asked government to:

- recognise the special purposes of protected areas such as National Parks (NPs);
- equip NPAs with adequate powers and resources to take action;
- ensure there is better enforcement of the law by all relevant authorities; and
- bring clarity to the legal status of routes quickly.

The first aim has largely been met by the Natural Environment and Rural Communities Act 2006 and in Defra guidance to NPAs on the use of their new TRO powers. However, TROs have proved burdensome, expensive and difficult to make. NPA and Highway Authority (HA) funding has been steadily cut and these authorities are often subject to legal threats or costly legal challenges if they propose TROs on green lanes. The result is that neither NPAs nor HAs have made extensive use of their TRO powers to protect National Park green lanes - Byways Open to all Traffic (BOATs) and Unsealed Unclassified Roads (UURs) – as intended by statute. It is clear that further action is required. Effective enforcement of TROs has also proved resource intensive for NPAs and the police. We can provide further information about the experience of using the existing powers in NPAs if required.

In addition, there is still a lack of clarity about the legal status of green lanes as the rights of way status of most UURs remain unknown and this issue also needs to be addressed.

The consultation refers to the fact that certain vulnerable groups are particularly reliant on vehicular access, but the community transport referred to is very unlikely to be using unsealed routes anyway. Furthermore, these green lanes are a valuable resource for the less mobile as there are no stiles or other obstructions and it is vulnerable users such as the elderly or disabled who are most at risk as non-motorised users of these routes.

There is a strong precedent for this ban as off-roading is already banned in Protected Landscapes in many other countries including Germany, Switzerland, Austria and Canada and in others such as France, Spain and the USA it is very tightly controlled. It is banned altogether in the Netherlands which leads to Dutch drivers bringing their vehicles to the UK for off-road driving. As it is clear that a ban will displace this type of activity to other neighbouring countries we suggest the Government works with the devolved administrations to introduce a ban across the whole of the UK, but in any case, the ban should definitely be introduced in England.

Planning reform

We welcome Government's recognition of the special role that Protected Landscapes hold within the planning system, and we believe it is essential that NPAs retain their role as planning authorities responsible for both plan-making and planning decisions, if they are to be able to deliver the strengthened statutory purposes effectively. This 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. Being a planning authority enables the NPAs to adopt a consistent approach across the whole of the National Park area regardless of local authority boundaries allowing for a clearer focus on the National Park purposes and better alignment between the Local Plan and the National Park Management Plan.

It is important that NPAs continue to be treated in the same way as other local planning authorities. This means that only members of the NPA should sit on any planning sub-committee. We note that the Government response does not make any reference to Glover's proposal to set up separate planning sub-committees which would largely consist of members not on the NPA's main Board. We trust this means the Government has no intention to take this idea forward. We had significant concerns about separating out

planning in this way as it fails to take account of the key role that planning plays in delivering many of the NPA's other responsibilities.

The role of AONB teams in planning

We support the proposal to grant AONBs statutory consultee status for planning applications.

Permitted development

We would like the implementation of Glover's proposal for a review of permitted development rights, and for further permitted development rights to be withdrawn in Protected Landscapes in recognition of the additional protections that apply in these areas.

Affordable housing

We agree with the Government that a new housing association is not the most effective way of tackling the housing challenges in Protected Landscapes. However, we are very disappointed that the Government's response does not include any concrete proposals to address the lack of affordable housing for local people, and the increasing proportion of second homes and holiday lets in Protected Landscapes.

The high-quality environment in National Parks makes them attractive places to live. The fact that National Parks have an increasingly ageing population indicates that they are seen as particularly attractive places to relocate for those who are retired as well as being popular areas for second home ownership. Consequently, average house prices in National Parks are already significantly higher than the average house price in their respective region.

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. NPAs 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 and many new housing developments in National Parks have been carefully designed to fit into sensitive surroundings while meeting the needs of local communities.

NPAs' current approach to housing delivery, as set out in Local Plans, ensures that the limited development opportunities available cater for local needs rather than meeting the high demand for market housing. It is important that NPAs 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 NPAs 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 Government could do to support the delivery of housing which supports the needs of local people in National Parks.

The issue of second homes is a significant barrier to the development of thriving, sustainable communities in many parts of the Parks and there are limited options for the NPAs to address this issue without changes at a national level. We want the Government to introduce measures to allow for additional council tax to be paid on second homes and by businesses

that operate multiple holiday lets. We would also like to see the introduction of measures to allow local planning authorities to require planning consent for a change of use from a permanent residence to a second home or holiday let in areas where high numbers of such properties are having a detrimental impact on local communities. This should be along similar lines to the proposals which the Welsh Government has recently consulted¹¹ on and which involve changes to secondary legislation to create new use classes for second homes and holiday lets and to primary legislation to ensure that this change of use is a material consideration in planning decisions. Changes to the planning system would need to be accompanied by a number of other changes including a compulsory licensing scheme for holiday homes and more resources for local planning authorities to enable them to deal with the increased number of planning applications and associated enforcement activities. There is further information in our response to the consultation¹².

Chapter 4: Supporting local delivery

Local governance

We agree that governance of the National Parks needs to change and improve to ensure that these areas are delivering more for nature, people and climate. We are pleased to see support for some of the measures to improve governance that we have long been advocating such as improved training, fixed term appointments and clear performance standards. We particularly welcome the measures aimed at improving performance including performance reviews and making it easier to remove under-performing members as this should help ensure that all members take full account of the specific responsibilities of their NPA role. However, further consideration should be given as to what else could be done to ensure that all Board members act in the best interests of the National Park when making decisions as part of the NPA. There is significant anecdotal evidence to suggest that this is not always the case, particularly for local authority-appointed members.

In order to improve the performance of NPA Boards, there is also a need to increase the proportion of members with relevant skills and expertise. This should be achieved in part by increasing the proportion of national members as they are already selected on this basis and we believe at least 50% of Board members should be nationally appointed, as was proposed originally by Hobhouse. Increasing the proportion of national members is also more likely to increase diversity on NPA Boards although to ensure this happens most effectively, consideration should also be given as to whether changes are needed to the application process, timing of Board meetings and other relevant arrangements in order to support and encourage those from a diverse range of backgrounds to apply.

We also support the introduction of merit-based criteria for local authority appointments as another way of increasing the expertise on NPA Boards. These local appointments should be made using criteria based on the skills needed to deliver National Park purposes and on the basis of an open competition to select the most appropriate candidates from across the local authorities within each NPA's area, rather than on the basis of each authority having a certain number of appointments as is currently the case. Any elected representative from the relevant authorities would be able to apply for a place and the most appropriate candidates would then be chosen based on the merit-based criteria and an analysis of the skills needed

¹¹ [Planning legislation and policy for second homes and short-term holiday lets | GOV.WALES](#)

¹² [220222 \(FINAL\) CNP AWDL response to WG consultation on planning changes for second homes and holiday lets.pdf](#)

for that particular Board. Where there are insufficient suitable candidates to fill the local appointments, then additional national appointments should be made based on the same merit-based criteria and analysis of the skills required and advice and/or training should be offered to local elected representatives to ensure they are better equipped to apply in future rounds of the competition. This approach would allow for continued representation from locally elected representatives, while ensuring there was increased involvement on NPA Boards from those with relevant expertise.

Given local government reorganisation and the creation of unitary authorities in some areas with National Parks, there should also be a review of the number of local authority places on each Board, with a view to reducing these where there is no longer a need for so many authorities to be represented. This would allow for an increase in nationally appointed members without the need to increase the overall size of the Board.

While there is much that we support in this section, there are also a number of proposals which we do not want to see taken forward. We do not support proposals to allow greater flexibility over the proportion of national, parish and local appointments due to the risk of this leading to a reduction in national appointments. We agree that there is a need to increase diversity and expertise on NPA Boards but we do not believe that this ‘flexibility’ proposal will do anything to address this. It is unclear how, and by whom, the decision to change existing proportions would be made but if it is for the Boards themselves to do this, there is a very real risk that it would lead to a reduction in the proportion of nationally appointed members on NPA Boards, given that there is already a higher proportion of locally appointed members and such members are likely to vote in favour of increasing local appointments. There should definitely be no reduction of nationally appointed members on NPA Boards or any separate sub-committees and, as set out above, the proportion of such members should instead be increased to at least 50%. As well as being home to local communities, National Parks are national assets, nationally funded and with a national ‘customer base’. They have been designated for the benefit and enjoyment of the nation. Those responsible for National Parks must balance the needs of local people and businesses with these aspects. This can only be done effectively if they have the right balance of locally and nationally appointed members on all relevant committees, including those involved in planning decisions.

We are also opposed to the proposal that the Secretary of State should appoint the NPA Chair. This could lead to the politicisation of NPAs and is completely inappropriate for organisations which are special purpose local authorities. It is not clear how this would provide the “greater continuity, strategic direction, and accountability” referred to in the consultation documents. The Chairs should continue to be elected by the other members of the NPA Boards as currently happens. Instead, we suggest that the Secretary of State sets out statutory guidance to NPAs to provide strategic direction. It should remind the members of Authorities of their duties, under the [Code of Conduct for Board Members of Public Bodies](#) (2019, Cabinet Office) including that they should “at all times, act in good faith and in the best interests of the body” (and not therefore in the interest of their respective Councils in the case of locally appointed members).

There is scope to strengthen governance and accountability related to administration functions of National Park Authorities by amending legislation. We propose:

1. An amendment to bring the Broads Authority in line with the other National Park Authorities for the S25 Local Government Act 1972.
2. An amendment to enable Public Interest Complaints to be investigated by the Ombudsman.

Management Plans

Developing Management Plans

Management Plans are key mechanisms for furthering the statutory purposes of National Parks and enhancing their special qualities. It is, therefore, essential that NPAs and all other relevant bodies play their part in ensuring that the Management Plans are as strong and effective as possible and result in action. We welcome the Government's intention to set out a clear national ambition for the outcomes in Protected Landscapes and to use the outcomes framework to identify appropriate targets for individual landscapes. There will need to be mechanisms in place to ensure that each Management Plan includes a clear plan for meeting those targets and that the identified actions are then delivered effectively. This means it will be essential for all those who need to contribute to the delivery of the required outcomes to be involved in the development and delivery of the Management Plan. While many NPAs already have well-established mechanisms for developing their Plans in partnership with other relevant organisations, this process needs to be strengthened if it is to be truly effective. In particular, there should be a new requirement for NPAs to identify and notify the organisations that need to contribute to delivery of the Management Plan, at an early stage its development. These organisations would then be required to help develop a costed set of actions needed to achieve the Management Plan targets and then deliver those actions. Where an organisation does not currently have the budget available to implement the actions identified, the outcomes to be delivered through the Management Plan could be used to support a business case for additional funding.

This process should be incorporated into the proposals for a statutory requirement on relevant bodies to support the development and implementation of Management Plans and to strengthen the duties on other public bodies (as discussed below). The bodies identified should also be required to set out how they will fulfil the new stronger duty to further the purposes and this commitment should be included in the Management Plans to enable Government, NPAs, NGOs and other partners to hold relevant organisations to account.

To ensure that the actions set out in the Management Plans really will deliver the intended objectives, there also needs to be a much better mechanism for approving their contents, and monitoring their delivery, than is the currently the case. We would like to see the introduction of a system whereby, Management Plans are reviewed or signed off by the Secretary of State for the Environment (as per Defra's role in water and air quality planning), bringing accountability and would be responsible for confirming that they set out an appropriate set of actions to deliver the required outcomes. It would then be Natural England's responsibility to monitor, and report on, progress on delivery of those targets on a regular (probably annual) basis.

We welcome the commitments for Natural England to update the guidance on Management Plans. However, it is important that any improvements to Management Plans are not dependent on this updated guidance being available given the urgency of the need to deliver better outcomes. The Government should issue strategic guidance which makes it absolutely clear that, with immediate effect, all current and forthcoming Management Plan reviews should include much stronger, more challenging targets and a stronger emphasis on securing change as quickly as possible. This strategic guidance should also set out the responsibilities on other bodies and make it clear that they are expected to contribute to the

development, and delivery of, Management Plans even in advance of the legislation being passed.

We believe it is critical that Government sets out new accountability functions, with a clear line of sight between development of Management Plans, Natural England, Defra and the new Office for Environmental Protection. We propose new legislation to underpin these arrangements including:

1. Strengthening the Management Plans including by requiring targets, and notification of 'other bodies' who have a requirement to 'further the purposes'.
2. Strengthening accountability by requiring the Defra Secretary of State to set national targets, produce regular strategic guidance for Management Plans, and sign off Management Plans. There needs to be a clear line of sight in legislative terms between the Management Plans and the new Office of Environmental Protection.
3. Strengthening scrutiny by giving Natural England a new role, akin to that of the UK Committee on Climate Change, to review, advise and report to parliament and the public on the adequacy of policies and plans to meet targets.

The role of NPAs could also be further strengthened by better integrating and aligning the Management Plan with land-use planning. One of the key mechanisms for delivering the priorities in the management plan is the Local Plan and most NPAs 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. There will also need to be a good alignment between Local Plans, Management Plans and LNRs once the latter are established. In future LNRs will need to both inform the contents of Management Plans and help deliver the targets in them but NPAs should not wait for LNRs to be completed before including stronger action for nature recovery in their Management Plans.

Content of Management Plans

Management Plans should include specific goals and targets for habitat improvement and/or creation and species population recovery, and a spatial representation that sets out which policies are a priority for different areas of the Parks. This should include 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. We also believe that NPAs should identify areas within which they will implement policies to increase wildness. This will include working with landowners and managers, to support them to manage the land less intensively and encourage the natural regeneration of more robust, functional ecosystems including through rewilding projects. 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 from locally tailored environmental land management schemes, the priorities for which are determined by the priorities in the

Management Plan. This should ensure future agreements or contracts with farmers and land managers to support the delivery of the priorities in the Management Plan.

Management Plans should also identify the key locally distinctive and important landscape and cultural heritage features in each National Park, along with how they will be conserved and enhanced. Decision makers must take account of the need to protect and enhance landscape and natural beauty while still allowing these areas to evolve and change over time. 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.

A clearer role for public bodies

We are very pleased to see that the Government plans to strengthen the duties on other public bodies. This should be achieved by replacing the current duty to 'have regard to' with a duty 'to further National Park purposes'. The current wording is insufficient because 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. 176 of the revised 2021 NPPF).

It will only be possible to deliver the desired outcomes in National Parks with the support of a wide range of organisations and it is essential that the final wording chosen for the amended duty is strong enough to ensure that all relevant public bodies play a more active role in the development, and delivery, of Management Plans. Strengthening this duty will also help achieve more meaningful partnership working between NPAs and their constituent local authorities in order to tackle some of the socio-economic challenges in National Parks, such as housing and transport, as well as ensuring that relevant organisations such as National Highways and utility providers are taking account of the need to further the purposes when making decisions which affect land in these areas.

We welcome Natural England's new responsibilities with regard to Management Plans but we are concerned that neither Natural England nor the new partnership will have a sufficiently strong remit to be able to ensure other bodies contribute effectively.

Sustainable financing

We agree with the Government that its ambitious new vision "must be matched by equivalent resources to ensure effective delivery". We are therefore concerned with proposals for sustainable financing, that at best, reflect continued uncertainty, short termism and embed the status-quo, and at worst, signal a continuing withdrawal of Government stewardship of these incredible national assets (privatisation by the back door). The lack of a robust financing model will further widen implementation gap between ambition and implementation and puts Protected Landscape bodies in an incredibly difficult position, unable to deliver for nature, climate and people.

It is critical that the Government invests now. Without greater state investment, bodies will not be able to deliver returns: they will not be able to leverage significant opportunities for private, philanthropic, partnership and other government department finance, will not be able to deliver upon levelling up missions for health, skills and pride of place, nor support Government to fulfil biodiversity and Net Zero pledges. Consistent multi-year funding for Protected Landscapes is the critical foundation on which to build an ambitious finance model, to deliver returns 100-fold. The Glover Review was very clear that central government funding should “be both extended and secured across a five-year period” as part of the new financial model set out in Proposal 27, and we are very concerned that the Government appears to be ignoring this aspect. Without this, National Parks and AONBs will fail to draw on a more diverse range of income sources.

As every business and charity knows, you need to invest to deliver the returns and to grow. Businesses, such as Palladium, have made clear that the reason that they are able to develop a business case for private sector investment in National Parks is because there is the institutional infrastructure provided by the state, to broker between buyers and sellers of ecosystem services. It is crucial that the core costs of running Protected Landscape bodies – staff, buildings etc – are sufficiently covered by the Government.

Without the foundation of enhanced and long term public funding, the emphasis in the response on private finance is alarming as there are significant risks that must be mitigated. The focus on maximising the commercial value of our Protected Landscapes is inconsistent with the statutory purposes. It will lead to increased pressure for commercial development, very real cultural risks related to ‘land clearances’, an increase in conflicts of interest and risks greater private sector influence in the planning process. There are risks that ‘the tail wags the dog’ with investment in areas that are attractive to the market, but not a priority to further the purposes. There are risks in implementation in ensuring long term outcomes for nature, people and climate. All these risks can be mitigated with the right government framework including core investment.

Carbon off-setting through land-management has specific risks including under-mining demand management (if carbon savings are used as a justification for not reducing direct emissions). There are also significant levels of uncertainty about exactly how much carbon different types of habitats store and for how long. For example, natural processes such as wildfires, could result in the release of carbon stored in woodlands or peatlands and peatlands need to be in good condition in order to be able to store carbon in the first place. Off-sets must be independently verifiable, and robustly monitored to avoid double-counting. As well as being permanent they must also result in a real net reduction in emissions, taking account of any additional emissions resulting from their establishment, ongoing management and monitoring. This is important as some of the processes required to implement nature-based solutions can be fairly carbon intensive, for example, helicopters are often used to transport materials to peatland restorations sites which are inaccessible by other means

Importantly, while there are developing markets for carbon, e.g. peatland restoration and tree-planting, there are many other crucial activities, such as routine footpath maintenance, engaging diverse communities and visitor engagement, which have no nascent payment for ecosystem services investment models. The Government’s proposals on Sustainable Financing fails to address how it will invest in access, enjoyment, culture and heritage.

We agree that the scale of investment needed is significant and that there is a clear role for all sectors to play. Government has a crucial role to play: to stimulate market opportunities, including by making significant core investment; to direct and regulate markets to safeguard and mitigate risks and to ensure that investment is directed by Management Plans, and; to

ensure transparency and accountability to build trust and confidence in the financing system. This should include clear and separate accounting for core functions of the Authority and funds raised through other mechanisms.

We recognise that there is a particular need for increased core funding for AONBs. If Government is to deliver its ambitions, there is an urgent need for increased long-term core resources for all Protected Landscapes to make up the major funding shortfalls in recent years. Defra core funding for National Parks has decreased significantly since 2010 with NPAs typically receiving around 24% less government funding in cash terms (allowing for inflation, this equates to a reduction of over 40% in real terms). For example, Northumberland NPA's core grant was around £3.5 million in 2010/11 but for the current financial year (2021/22) this was reduced to under £2.7 million. The current expectation (at the time of writing in March 2022) is that NPAs will receive a flat cash settlement for next financial year which effectively means further cuts: the fact that they still do not know how much money they will receive from Defra for a financial year that starts in a few weeks' time is an issue in itself. These are national assets which deliver significant benefits for the nation in terms of carbon storage, improved water quality, health and well-being and more so there is overwhelming justification for providing them with good levels of public support.

Protected Landscapes will not be able to deliver against the proposals in the Government's response without additional public-sector investment.

General power of competence

We recognise why NPAs feel a general power of competence is needed and we are willing to offer support in principle for this, but only if it is introduced alongside other legislative proposals aimed at ensuring that NPAs' activities are more focused on nature recovery and increasing the opportunities for access. It should also be made absolutely clear that this new power does not over-ride other duties and responsibilities including the strengthened purposes; an appropriately updated Sandford Principle which applies to all authorities including the Broads; and a stronger duty to further the purposes. It is essential that NPAs are not able to use this new power to promote or permit anything which is not compatible with their statutory purposes. We could not support the general power of competence being introduced without these other changes as there is a very real risk that it would lead to an increase in commercial activities which are damaging to the Parks. To ensure that this new power is being used as intended, Natural England's new responsibilities should include monitoring and reporting on its use.

This is a key moment for the future of our Protected Landscapes, and one which will have a significant impact for many years to come so it is critical that the right choices are made now. We have highlighted above what we believe to be the essential elements for achieving the Government's vision for a "national network of beautiful, nature-rich spaces that all parts of society can easily access and enjoy" and we are keen to work with you to ensure all these elements are delivered.

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