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To Rt Hon Lord Benyon
Parliamentary Under Secretary of State
Department for Environment, Food, and Rural Affairs

11 March 2022

Consultation response – Government Response to the Landscape Review.

The Quantock Hills AONB Partnership welcomes the Government response to the Landscape Review, setting out how it sees protected landscapes delivering for nature, people and places. For clarity our comments below are set out using the same headings.

One significant but broad comment is that while this consultation is appreciated many items in the Government response are in the form of headline potential policies. We consider it essential that when the Government have developed these further, these sections are provided to all protected landscapes lead officers in draft form with the opportunity to comment before they are finalised.

1) Strengthened AONBs (New name)

- a. The Quantock Hills AONB Partnership supports the renaming of Areas of Outstanding Natural Beauty (AONBs) to 'National Landscapes' as it will:
 - Reinforce the 'national' aspect of designation raising the profile and further reinforce the cohesive network of the protected landscape family.
 - Be easier for the public and stakeholders to interpret and understand through new branding and a single set of key messages.
- b. It is important that the renaming is delivered alongside other aspects of the review, such as the uplift in core funding, review of governance, and increased role in planning. Renaming alone will not achieve the step change required for protected landscapes to deliver the vision and outcomes of the review.

2) Strategic Direction (New National Landscapes Partnership)

- a. We are encouraged that the forming of a new Government Body (The National Landscape Service) has been rejected and that a strengthening of the existing protected landscape bodies, National Parks England (NPE) & National Association of AONBs (NAAONB) is proposed with the formation of a Landscape Partnership.
- b. There will need to be a clear remit for this partnership with an equal voice between the National Parks and AONBs. We would like to see the membership of the partnership reflect the new objectives as set for the National Landscapes.

While in principle we are very supportive, we are keen to understand in greater detail how this operate and how AONB partnerships and boards / National Park Authorities will have an input into this partnership.

3) Strategic Direction (new National Landscape Strategy)

- a. While we welcome a new national Landscape Strategy we are keen to understand the relationship between the 'top down' and 'bottom up' priorities. National priorities as mentioned do not include the fundamental element of landscape protection and enhancement, including the historic environment, but concentrate on nature recovery, climate mitigation and adaptation.
- b. It is essential that conversations on this continue with all AONB Partnerships as the Governments response on this element is a headline with no detail.

4) A Stronger mission for Nature Recovery (Changed Statutory Purpose)

- a. We support a single set of statutory purposes for both AONBs and National Parks, however the statutory purpose of conserving and enhancing the landscape needs to be retain and fully explained in the revised guidance. We are keen to understand how the Government will address the funding disparities between AONBs and National Parks given the proposal for the single set of statutory purposes.
- b. We strongly support the potential amendment to the purposes to increase the equality of access to the health & wellbeing benefits of the protected landscapes. However the Sandford Principle should still apply to National Parks **and AONBs** when considering the purposes. The Sandford Principal which should be applied equally to National Parks and AONBs states: *National Park Authorities can do much to reconcile public enjoyment with the preservation of natural beauty by good planning and management and the main emphasis must continue to be on this approach wherever possible. But even so, there will be situations where the two purposes are irreconcilable... Where this happens, priority must be given to the conservation of natural beauty.— Lord Sandford, 1974*

5) Setting ambition and monitoring progress

- a. We welcome the ambitious setting of ambitious goals and the provision of robust evidence to allow accurate monitoring – it is essential that Defra / Natural England work on this with all protected landscapes that wish to engage, rather than a small group that is unlikely to represent the diversity of AONBs in England.
- b. In setting the monitoring framework Government must be mindful of the need for continued provision of evidence, especially at key times, such as during management plan reviews. In the past a failing of successive organisations has been the lack of continuity of data, which reduces the ability to monitor trends and set policies and actions accordingly.

6) Agricultural Transition

- a. We strongly agree that the special significance of protected landscapes must be reflected in future environmental land management schemes. These are a key delivery mechanism for achieving the ambitious vision and outcomes

Government has set out. We have seen, in a short space of time, the benefit of the Farming in Protected Landscapes Programme (FiPL) in targeting resource to achieve outcomes for nature recovery, climate change and for people.

- b. Building on FiPL we believe there is a role for protected landscapes in the delivery of ELMS, providing a local coordinated approach to decision making, while delivering on national priorities. Dedicated advisors are already proving invaluable, especially in facilitating collaborative approaches and projects.
- c. As set out in the Colchester Declaration AONBs have pledged to develop Nature Recovery Plans, with many in draft form and being consulted on. We believe these will provide a detailed local context and should be used to inform the development of the Local Nature Recovery Strategies (LNRS) allowing the development of nature recovery strategies at a landscape scale and providing linkage between protected landscapes and the wider landscape.
- d. We appreciate that in many instances the scale and range of an AONB makes it unsuitable to be a responsible authority for the development of a LNRS, unlike National Park Authorities. However we encourage strong procedural guidance ensuring AONB partnerships are fully consulted on, engaged in the development of and provide agreement on the LNRS.
- e. For this to occur protected landscapes teams should be expected to be engaged in the development of the LNRS and provided with the required resources to achieve this. Without this approach the development of LNRS will risk identifying projects that are contrary to the statutory AONB management plans.

7) Landscape for everyone

- a. We fully endorse strengthening the role of protected landscapes in supporting the country's health, wellbeing and education. Local protected landscapes led projects and initiatives have achieved very successful outcomes, especially those targeting mental health and wellbeing. However converting these initiatives into core business as usual has been less successful. We welcome Government's role in working across departments to facilitate the embedding of green social prescribing in the work of protected landscapes.
- b. The Quantock Hills AONB has included rangers – originally called wardens – as part of the core team since 1974. Throughout this time the partnership has seen these posts as core elements of our protected landscape offer. We welcome governments commitment to seeking ways to increase the number of rangers engaging with people, which we believe can be facilitated through the increasing of core grant as proposed by the Landscape Review.

8) Supporting local communities

- a. While we agree with the Government proposed approach of not creating a new statutory purpose to foster economic and community vitality we feel it is important that these elements are brought into AONB objectives, in a format that is subsidiary to the primary purpose. We are not convinced that the special status of, and impacts on, those communities that host these special designations is currently properly recognised in the proposals.

9) Managing visitor pressures

- a. Enhanced resources for those protected landscapes that have issues would be welcomed. The provision of on the ground staff, i.e. rangers, needs to be considered as a positive education and enforcement tool. Conflicts between maintaining open access and enhancing wildlife habitats/biodiversity have implications for increased delivery on nature recovery proposed in the government response.

10) Planning reform

- a. The Partnership will welcome Statutory Consultee status while recognising that the increased resources required will need to be funded above and beyond any agreed increase for core funding. Local experience is that while there is recognition of AONBs ability to contribute to the delivery of good quality development it has been tempered by the limited weight and consideration it is afforded in planning decisions.
- b. Updated Management Plan advice from NE needs to be clear on what planning content should be included in future Management Plans. There will need to be clear guidance for local planning authorities on the status of statutory AONB Management Plans and the interaction with local plans.
- c. We recognise that, to ensure management plans are fit for purpose in this respect and fully inform Local Plans, AONB teams will require specialist staff and enhanced resources.

11) Permitted development

- a. We consider a review of permitted development rights within the AONB to be long overdue. The AONB Partnership has been considering for many years applying for an Article 4 Directive however lack of resources has stopped this going forward.

12) AONB Partnerships

- a. We welcome the updating of this guidance which is long overdue, revised partnerships should reflect the requirements of both national and local interests. We support the suggestions in the Government response under 'Improved performance'. Again it must be recognised that to make important changes to governance on this scale requires resources.
- b. While we would welcome a Secretary of State appointee ideally this would be as an advisor within the committee rather than in the position of chair. When considering who the AONB should be accountable to local interests and communities are equally important as accountability to Defra / Government.

13) Management Plans

- a. We support the revision and updating of guidance on Management Plans, however we have significant concerns over the proposed timeline in the revision and development of the next AONB Management Plan. The reference to strengthening management plans and ensuring a smooth transition raises concerns that a top-down format / template will be applied which could impact the locally responsive aspects of the current management plans.

- b. Management Planning Guidance needs to balance the immediate priorities, such as nature recovery, with a robust future proof approach. Historically we have seen guidance being produced, which is then not reviewed for a number of years, it increasingly becomes out of date, causing protected landscapes difficulties in applying it and incorporating new and emerging priorities.
- c. We welcome the development of an “outcomes framework” for Management Plans allowing protected landscapes to monitor progress. Detailed consultation will be necessary with all protected landscapes to ensure an appropriate framework for highly varied protected landscape. Success will be strongly dependant on the provision of annual accurate data.

14) A clearer role for public bodies (Duty of Regard)

- a. We strongly support the strengthening of the statutory duties of regard not only for core public bodies involved with AONBs but particularly for those who undertake activity in or within the setting of the protected landscapes such as utility companies.

15) Sustainable financing

- a. We believe the doubling of core funding within AONBs as proposed by Julian Glover was identified as a reasonable way forward while a proper funding formula was developed. Not to deliver on this basic stop-gap measure would be a failure for our Areas of Outstanding Natural Beauty. While the Government response is clear about the difficulties in providing this resource it is a high priority for us that this is looked at again.
- b. We support a blended finance model to realise the ambitions and vision for protected landscapes but, as recognised by the Landscape Review, AONBs must have adequate and reliable core funding to support essential governance and business / project development. The government response blurs the boundaries between funding for specific outcomes (project) and unrestricted funding (core) that supports governance, business and development of the AONB management and staff structures. Without sufficient core funding protected landscapes will be unable to realise blended finance funding opportunities in the private sector.

Thank you for the opportunity to respond on the Governments response to the Landscape Review we see this as the starting point of discussions leading to Protected Landscapes delivering more for local and national priorities, we look forward to continued engagement.

On behalf of the Quantock Hills Joint Advisory Committee and AONB Service

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