



# Landscapes review: National Parks and AONBs

## ACRE Network submission to the Glover Committee

- 1. Summary**
- 2.** The ACRE Network is made up of 38 county based rural charities and their national association, ACRE; our shared mission is to build the capacity of local communities in order to meet the needs of those most disadvantaged by their rurality.
- 3.** This submission to the Glover Review is from the national charity, ACRE. We are seeking only to address national, structural and policy issues about the place of rural communities in the designated landscapes. We are encouraging our members to engage with the review in the light of their local experience of working with specific National Park Authorities and with AONBs.
- 4.** Despite the many good things that have been achieved in the designated landscapes, identifying them in this way has had a negative effect on the social balance of communities in these areas. We believe the Review Group must ensure that their recommendations will help communities within the Parks become more balanced both in terms of population age and social make up. This may require the Review Group to be radical about both Purposes and statutory powers of Park Authorities, especially in relation to statutory powers over planning.
- 5.** Designation must bring with it a responsibility to play a positive, but not leading, part in the wider local and national economy by encouraging housing and economic activity in a way that is not solely directed by the National Parks' current two Purposes. This is especially important when NPAs also act as the planning authority for their area. If either the Review Group or the National Parks themselves cannot agree to this, then serious consideration should be given to National Parks no longer being Planning Authorities.
- 6.** If the current 'two Purposes and a Duty' formula is retained, the Duty must not be constrained to a secondary role, solely in pursuit of the Purposes and should be re-drafted accordingly. This is especially true if National Parks continue to act as the Planning Authority for their area.
- 7.** NPAs and AONBs should only be granted powers and responsibilities where these are required to achieve programmes of activity that are specific to their designated landscapes and where they will help protect or enhance the area's Special Qualities. NPAs

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and AONBs should not be given powers that are better exercised by fully democratic local authorities.

- 8.** Wider socio-economic activities that are required in all of rural England – such as an England defined, and community based, equivalents of the LEADER programme – should be delivered in a way that allows consistency across all of rural England and not be 'cherry picked' by NPAs or AONBs and thus be used to pursue their Purposes alone.
  - 9.** The Review Group should be confident in its recommendations over governance and about the purposes, duties and powers of NPAs and AONBs. Proportionate (smaller!) governance processes, carried out by people committed to the reason for each specific Park or AONB's existence are essential. The reason for their existence must be well justified, widely understood and transparently implemented. This could give the Parks and AONBs a new lease of life in partnership with their local communities.
  - 10.** We are content to be quoted from this submission and it to be made available however the Review Group wish to publish submissions made to them.
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**11. Introduction**

- 12.** The ACRE Network is made up of 38 county based rural charities and their national association: ACRE; our shared mission is to build the capacity of local communities in order to meet the needs of those most disadvantaged by their rurality.
- 13.** The ACRE Network is making a submission to the Glover Review in this form and, in doing so, is seeking to address national, structural and policy issues about how rural communities interact with the designated landscapes. We are encouraging our members to engage with the review in the light of their local experience of working with National Park Authorities and with AONBs.
- 14.** The main national, structural and policy issues over which we are submitting comments are these, they do not, necessarily fit with the questions asked in the review's questionnaire:
- Review of the original reasons for establishing National Parks and consideration of whether these are still relevant in the twenty first century.
  - National impact on all rural areas of some landscapes being designated, especially if there is any possibility of development becoming more constrained in these areas. This is especially important in relation to post-Brexit environmental, economic and social policy.
  - The Purposes and Duty of National Parks and scope for similar purposes being applied to AONBs. We also consider allocation of other powers beyond the Purposes and Duty to designated landscapes eg planning powers.
  - Governance and democratic control of policy in National Parks in the light of new National Parks containing much larger populations than the initial post-war Parks.
- 15.** In this evidence we are not confining ourselves just to the direct impact of the review on the communities in the designated landscapes. We are also looking at the potential impact of policy towards the designated landscapes on the rest of rural England and the people who live there.
- 16. National Parks 70 years on**
- 17.** It is an article of faith to the many committed supporters, users, members and staff of National Park Authorities that they embody the post-war movement to provide access to the countryside for a substantially urban population. In this context the Parks are seen as a national asset irrespective of their land ownership; the term 'Park' carries a heavy symbolism despite their ownership and farmed nature making the term at best confusing to the public. It should be recognized at the outset that although the term 'Park' is applied to all (barring the Norfolk Broads) the degree of 'wildness' and level of intensive agriculture varies dramatically and this has an impact on the degree to which these areas should be considered 'the nation's Parks'.
- 18.** The original concept of National Parks was a relatively simple one and, arguably, it was this simple concept of protection and egalitarian access that encouraged the original designations to be confined to upland and less populated areas. This enabled the main beneficiaries of the original Parks to be clearly identified, especially for the 2nd Purpose, as the large areas of urban population who were seeking a right to walk in 'their' countryside. Arguably, the future needs of the indigenous population, apart from the historic owners of the land, were given little thought. The main objective was to preserve the landscape and rural economy at a particular moment in time in order to provide for the recreational needs of urban populations.
- 19.** If UK National Parks were being invented now, it is very unlikely that one group of stakeholders – the people living within the areas concerned – would find their social and

economic interests being set aside for the national good to this extent. It is hard to imagine any minority being treated in this way today. Over the past seventy years the social impact of this single-minded approach to designation and then to purposes has become increasingly clear.

20. The appearance of built settlements within the National Parks has been immaculately preserved, with little new housing supply and only very limited provision of new affordable housing. As a result, the communities living within them have experienced an exaggerated change to that which has also taken place throughout rural England. The populations of many of the National Park settlements are deeply unrepresentative of the country as a whole, as only those on high incomes or retiring from highly salaried jobs in urban areas can afford to live in them.

**21. The Review Group must ensure that their recommendations, if implemented, make a positive contribution to communities within the Parks becoming more balanced both in terms of population age and social make up.** This may require the Review Group to be radical about both Purposes and statutory powers of Park Authorities, especially in relation to statutory powers over housing and planning.

**22. National impact of designated landscapes**

23. Over the last few decades it has been possible to place the National Parks in a policy 'bubble'. They were relatively few, in Government terms they did not cost too much and they were mainly uplands with small populations and marginal agriculture. They were well loved by the national population and as a result supporting them was always politically desirable. Reviewing the National Parks alongside the AONBs means the landmass of rural England that is now under consideration is not just much greater, but also brings into consideration countryside and communities across almost all of rural England, from north to south, east to west.

24. Some further key changes have taken and these will impact on the designated landscapes and the people who live in them, taking National Park policy out of its 'bubble':

- Designation of new National Parks, in part on good quality agricultural land and in the highly populated South East.
- Growing pressure from some other AONB partnerships to seek National Park status and resources.
- A growing rural economy that is not connected to the land but, when enabled, is connected to the world.
- A national political need to accelerate house building and, as a result, a more laissez-faire approach to planning policy in relation to commercial house building.
- The UK's emergence from the EU/CAP; a focus on an urban Industrial Strategy seeking expansion, national food resilience and probable exposure of the land based industries to global commodity markets.
- And finally a review of designated landscapes that encompasses AONBs and National Parks but must also take account of other non-landscape scale designations.

25. England's rural areas are far from uniform and their 'value' varies widely. Taken at its simplest, there are two axes along which all rural areas are ranged:

- The first is landscape quality. One end of this axis is land that is of high landscape 'quality' and this results in the degree of historic designation for environmental

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protection/enhancement and quiet enjoyment. At the other end of the axis is land that is not designated in any way.

- The second is agricultural quality. One end of this second axis is land of high agricultural value, previously described as 'best and most versatile' farmland. At the other end is poor quality agricultural land whether this is due to its upland nature or poor quality soil, drainage etc.

In addition there is also a monetary value that comes from a rural area's proximity to urban centres that overlays both of these axes.

26. The table below seeks to explore how rural areas, categorised in these two ways, may start to become viewed in national rural policy:

	Lesser agricultural quality	Best and most versatile agricultural quality
Not designated for landscape or biodiversity value eg NP or AONB	<p><b>Urbanisation and sub-urbanisation</b></p> <p>Strong presumption in favour of 'sustainable' development, new settlements, non-land based economic use and infrastructure</p>	<p><b>Agricultural intensification</b></p> <p>Food production at scale dictated by the market</p>
Designated / protected areas for their landscape quality or biodiversity	<p><b>Rural maintained in a 'desired' state</b></p> <p>Development severely constrained. Non-economic high landscape quality, re-wilding etc. paid for as a 'public good'. Two tier communities: wealthy and those paid to maintain the land in its 'desired' state and to serve the visitor economy.</p>	<p><b>Intensive agriculture with 'hot spots' of wildlife</b></p> <p>In practice this is a rare category as there is little overlap between best quality agricultural land and major landscape designations.</p> <p>Buying of 'public goods' through taxation will have to compete with the production value of land accorded by the market.</p>

27. The policies that will have an impact on rural areas and could, between them, result in rural England developing in the way outlined above, are:

- The Industrial Strategy – as enabled and interpreted by BEIS and the LEPs
- The 25 year Environment Strategy – as enabled and interpreted by DEFRA
- Agricultural and Food Policy – as enabled by DEFRA and the Agriculture Bill
- The National Planning Policy Framework – as developed by MHCLG
- Policy towards Designated Landscapes – as recommended by the Glover Review Group

28. It would be very easy, and for the best possible reasons, for each of these areas of policy to be carried out with their own driving forces behind them, but without a clear sight of their combined impact on rural areas, including the designated landscapes. The result could be that rural England becomes increasingly polarized, with only the designated landscapes being considered 'real countryside' and investment in environmental goods only being made a priority within them.

29. If rural England were to be allowed to drift in this direction the communities in the designated landscapes would become even more exclusive and unrepresentative of the nation as a whole. Non-designated parts of rural England would be opened up either to suburbanisation on a large scale or highly intensive agriculture where the rewards of the market would easily trump any attempt to 'buy' environmental goods from landowners.

**30. Designation must bring with it a responsibility to play a positive, but not leading, part in the wider local and national economy by encouraging housing and economic activity in a way that is not solely directed by the National Parks'**

**current two Purposes. This is especially important where NPAs also act as the planning authority for their area. If either the Review Group or the National Parks themselves cannot agree to this, then serious consideration should be given to them no longer being Planning Authorities.**

**31. National Park Purposes and Duty**

- 32.** National Park Authorities (NPA) have two Purposes – environmental protection/enhancement and understanding/enjoyment. In addition, they have a Duty to foster the socioeconomic health of their areas, consistent with their Purposes. AONBs have similar purposes but, of course, these are not vested in special purpose local authorities but are carried out through liaison and co-operation between existing local authorities and their local partners. Most AONBs have appointed a small employed team, generally under the wing of one of the participating local authorities. Both networks identify the Special Qualities that guide the development of their Management Plans and other activities.
- 33.** NPAs are all Planning Authorities for their area and are funded by MHCLG and planning fees for this above and beyond the DEFRA grant provided to achieve NP Purposes. Planning responsibility remains with the parent local authorities for AONBs. Over recent years the planning powers of National Parks have become one of their most influential means of taking action and this has been largely guided by their two Purposes. Their Duty has tended to be linked to the second Purpose and placed great reliance on tourism as an economic driver.
- 34.** In respect of the social and economic Duty a requirement could be devised that provides more scope for positive action to support wider social and economic wellbeing (see para 28.) Again, this would apply equally to the National Parks and AONBs. It would state that, especially in exercising their planning function and related powers, whilst not acting to the detriment of their statutory Purposes, they should actively contribute to the broader social and economic well-being of communities within the designated areas. In other words, the Duty should be more than just a secondary means of pursuing the Purposes.
- 35.** As noted above, looking at the whole network of NPs and AONBs brings with it a national perspective. As a result, there may be a case for seeking a single framework for defining the Purposes, Duties, powers, and responsibilities of both, leaving aside for the moment the governance and resourcing issues that would accompany this.
- 36.** In place of a 'one size fits all' set of Purposes and Duty for National Parks, and locally defined strategies for AONBs, a single menu of possible powers could be devised for both networks. These powers would then be granted to the NP or AONB in direct relation to action that is needed to enhance the Special Qualities for which each of the areas justify their continued designation. This might provide a framework by which National Parks in areas of high population might have powers and duties that directly respond to having to work more with communities in order to achieve their shared purposes whilst others might need powers for wildlife protection if their special qualities derive from the particularly important and vulnerable wildlife in their area.
- 37.** This approach to purposes, duties, powers and responsibilities might enable Government to take a more flexible approach, resolve some outstanding issues with local government and become very clear with all stakeholders about what the national interest is, and how this is represented in the work that National Parks and AONBs carry out. More populous areas would need to ensure there is informed consent to the NPA or AONB taking on additional powers that would affect local communities. The menu might include:
- Wildlife protection powers

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- Those parts of Highways Authority responsibilities that relate to rural rights of way
- Expenditure powers over socio economic initiatives and powers to contract and delegate these
- Planning powers and development management, including the ability to delegate and contract out elements of these
- Collection authority responsibilities for the Community Interest Levy
- Responsibility for development of Community Infrastructure Strategy

**38. It is vital that NPAs and AONBs are only granted powers and responsibilities where they form an essential part of achieving programmes of activity that are specifically required in their designated landscapes and where they will help protect or enhance the Special Qualities.** Wider socioeconomic activities that are required in all of rural England – such as an England defined, and community based, equivalent of the LEADER programme – should be available in a consistent way across all of rural England.

### **39. Governance and management**

- 40.** Against a backdrop of Cabinet style local government, Executive Mayors and combined authorities NPAs can appear to have a very traditional local government structure consisting of large number of members, long winded committees and very risk averse administrative processes and procedures. Unfortunately, the received wisdom is that the best way to move away from this traditional approach is to move to a 'business board' style of management and governance. Designated landscapes are not businesses and whatever is put in place to replace the traditional approach must enhance the inclusion and genuine engagement of local communities, not the opposite.
- 41.** There is an assumption that basing membership of NPAs and AONB joint committees mainly on local government elected members will ensure strong local liaison between principal local authorities and the NPA or AONB joint committee. It is also assumed that this route to 'secondary election' from authorities that are themselves directly elected will avoid a democratic deficit. Neither of these is true. Involving existing local authorities through their members simply adds an additional burden of administration and, whatever rules are put in place, they almost always act as representatives of their appointing authority or, worse still, their political group.
- 42.** The Review Group might like to consider alternative ways of bringing into place the combination of a wider, inclusive, group of stakeholders combined with a smaller and more executive group. Some National Parks already have partnership forums that underpin their Management Plans and these could provide a starting point for a more inclusive form of governance.
- 43.** A much wider group of stakeholders from within the Park area could oversee the Strategy and Management Plan. Membership of this group would be by application and would have to relate directly to the Special Qualities the Park or AONB exists to protect/enhance. This group could elect the majority of a smaller Executive Group on which would also sit a small number of representatives of local government elected from amongst the local authorities in the area.

**44. The Review Group should not shy away from making recommendations about governance or about the purposes, duties and powers of NPAs and AONBs. Proportionate (smaller!) governance processes, carried out by people committed to the reason for each specific Park or AONB's existence are**



**essential. The reason for their existence must be well justified, widely understood and transparently implemented. This could give the Parks and AONBs a new lease of life in partnership with their local communities.**

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