



Response to consultation on Government response to the Glover Landscapes Review

Wildlife and Countryside Link, Nature and Wellbeing Strategy Group, April 2022

Covering letter – submitted via email

Thank you for the opportunity to respond to this consultation on implementing the Glover Landscapes Review.

Wildlife and Countryside Link is a coalition of 65 environmental organisations in England, using their strong joint voice for the protection and enhancement of nature. This Link response is supported by: A Rocha UK, Amphibian and Reptile Conservation, Bat Conservation Trust, British Canoeing, British Ecological Society, British Mountaineering Council, Buglife, Bumblebee Conservation Trust, Campaign for National Parks, Chartered Institute for Ecology and Environmental Management (CIEEM), CPRE – The countryside charity, Institute for Fisheries Management, Open Spaces Society, Plantlife, People’s Trust for Endangered Species, the Ramblers, Rewilding Britain, the RSPB, the Wildlife Trusts, Wildfowl and Wetlands Trust, Wildlife Gardening Forum, Woodland Trust and Youth Hostel Association. For more information about this response, please contact Emma Clarke at Link (emma.clarke@wcl.org.uk).

The joint Link response consists of this covering letter, which highlights our key points and concerns with respect to the Government’s response to the Glover Review and its proposals for implementation of the Review, and our responses to the consultation questions below, which were also submitted via the online consultation form.

We welcome this consultation and the opportunity to comment on the Government’s response to the Glover Review and proposals for implementing the Review. We also recognise that this consultation largely covers the proposals that require statutory change. It is important that Defra continues to engage us and other stakeholders on these proposals and the detailed wording of the statutory changes, as well as other proposals that are taken forward from the Glover Landscape Review.

Protected landscapes provide many benefits for nature, climate, people, heritage and culture, but are struggling to achieve the level of recovery for nature and improvements for the public that are needed. Large parts of these areas are in a poor condition for nature and the benefits they can bring for nature, climate and people are not being maximised, often despite the best efforts of the bodies responsible for these landscapes, which have not been given the direction, tools and resources they need by the Government. There is already good work going on in National Parks and AONBs, but not at the pace and scale required by the nature and climate emergency. Protected landscapes can make a significant contribution to improving the condition of protected sites within their boundaries, as well as improving the state of nature across the countryside, and must fulfil this contribution in order for the Government to meet its 2030 species abundance target, other targets under the Environment Act and the 25 Year Environment Plan, and its international commitments including 30x30.

We welcome the stronger focus on nature and on public access in the proposals to revise the statutory purposes for National Parks and AONBs. We also support the proposal to have a common

set of statutory purposes across all protected landscapes. The detail of the wording of the new purposes and duties and an update of the Sandford Principle will be crucial to ensure that these purposes prioritise nature's recovery and cannot be used to justify environmentally damaging activities. We agree with the Government that the existing duties for public bodies to 'have regard' to the statutory purposes are too weak. Instead, public bodies should be required to 'further' the statutory purposes of protected landscapes so that they are given greater weight when exercising public functions.

Additional and long-term funding is needed to help make up existing funding shortfalls and deliver on these strengthened and new statutory purposes.

There is much more that National Parks and AONBs can and should be doing to connect people with protected landscapes. The Glover Review had a strong vision for connecting people with protected landscapes and Link is concerned that the Government's response to the Glover Review lacks ambition in this area, failing to pick up on many of Glover's recommendations on access. We feel this is a missed opportunity to set a clear direction towards which Government and all partners should work, and to develop concrete proposals to increase the provision of access, facilitate access and to increase the diversity of visitors to protected landscapes.

Many of the proposals relating to protected landscapes' boards are welcome. For example, improving training and performance management, setting fixed terms, reducing the size of boards and merits-based local appointments. However, they do not go far enough to address the fundamental issue that there are not enough people on boards with expertise (professional and lived experience) across the National Park and AONB statutory purposes and there are no proposals to increase the diversity of boards.

A much greater proportion of board members should be appointed for their expertise in protected landscapes' purposes by amending the current legislative requirements for 75% of most boards to be appointed from local councillors. The proportion of members who are councillors should be significantly reduced to allow for greater expertise and diversity on boards, and so that there are more outside voices. We would like to see the Government explore the possibility of a process for locally-appointing board members from outside the pool of local councillors based on a merit-based application process. Otherwise, we would support increasing the proportion of members who are appointed by the Secretary of State nationally based on merit to at least 50% of boards, which should where possible result in the appointment of people with a strong local connection. The legislation should require that there is an overall balance of expertise between the purposes amongst the members as it already does for the Broads Authority. We do not support the proposal to introduce flexibility in the number of local and national appointments as this could reduce the number of national appointments and levels of expertise in protected landscapes' purposes.

We welcome the proposals to strengthen Management Plans and public bodies' contributions to them. We agree with Government that the current duties are not clear that public bodies are expected to contribute to the delivery of management plans. Relevant public bodies should be given a duty to support the development and implementation of the Management Plan and report on how they are achieving this and designated landscape bodies should be required to coordinate and report on the overall implementation of the Management Plan.

These plans should identify protected landscapes' contributions to targets to improve the condition of protected landscapes, meet protected area targets, and meet Environment Act and 25 Year Environment Plan targets. Government, including through the national outcomes for protected landscapes set by January 2023 and the outcomes framework that will be developed by NE, should

encourage protected landscapes to maximise their commitment and contribution to improving and expanding the amount of semi-natural habitat with a national intention of having at least 40% of protected landscapes nationally covered by high quality semi-natural habitat. For example, the Cotswolds AONB has recently adopted a [Nature Recovery Plan](#) that aims at 40% good quality habitat for nature, in line with [scientific evidence suggesting that 40% of National Parks and AONBs should be semi-natural habitat. This would](#) enable these large areas of National Parks and AONBs to contribute to the development of resilient ecological networks and contribute to the Government's commitment to protect and manage at least 30% of land by 2030.

Protected landscapes should also be encouraged to set targets for wilder areas, with a focus on restoring a wide range of natural processes, habitats, and missing species to form mosaics of native forest, peatlands, heaths, species-rich grasslands and wetlands. For example, [Exmoor National Park has pledged to create 7000 hectares](#) (10% of the Park) of nature recovery opportunity areas where nature and natural processes are allowed to take their course. Appropriate and timely environmental and public access data from regular monitoring will be needed to do this. Monitoring approaches and data infrastructure should be joined up with Local Nature Recovery Strategies and Environmental Land Management schemes. National Park Authorities (NPAs) and AONB teams should have a formal role in the development and governance of relevant LNRSs and should lead and convene partnerships to deliver the relevant measures identified within them and actions set out in Management Plans.

Crucially to all the Government's proposals, and notably lacking in their response to the Glover Review, is a commitment for increased long-term core resource for protected landscapes (not just project-based grants). This is needed to make up past funding shortfalls, especially for AONBs, to deliver at the scale needed for nature, climate and people as well as to support the welcome proposals to strengthen the statutory purposes of protected landscapes. For AONBs, where the greatest need for additional resources lies, the Glover proposal to double their modest funding from £6.7 million to £13.4 million should be implemented without further delay. This must be done by increasing the overall funding available for designated landscapes to ensure it does not lead to any reduction in funding available for National Parks. These resources should be linked to the delivery of SMART targets and actions in protected landscapes' Management Plans that are aligned with, and sufficiently ambitious to deliver, the Government's national environmental and connection to nature targets in the 25 Year Environment Plan and Environment Act 2021, and international commitments and ambitions to connect all parts of society with protected landscapes (for example, building on the AONBs' [Colchester Declaration](#)).

A legislative vehicle is also needed to take forward the statutory changes proposed in the Government's response to the Glover Review. Given the scale and urgency of the nature and climate crises and the disparities in physical and mental health and access to nature that were highlighted and exacerbated by the COVID-19 pandemic, action to take forward these proposals must proceed without delay.

There were several aspects of the Government's response to the Glover Landscapes Review that were not consulted on and about which we would like to comment.

It is unclear what role the new national landscape partnership will play and whether Natural England will have the powers and resources it needs to provide the support, oversight and accountability for this partnership and its strategy. It is also unclear who will be involved and whether it will have sufficient funding for proper partnership working. We also have concerns that neither Natural England nor this new partnership will have sufficient independence and remit to champion protected landscapes across Government and to challenge the protected landscape bodies when

required. Further details are needed and we would welcome the opportunity to contribute further on the creation of the national landscape partnership.

There is a need for join-up between Government departments to deliver on the potential for National Parks and AONBs, especially for people. While the Government welcomed local authorities and NPAs efforts to develop more sustainable transport options to access protected landscapes and committed to update the Local Transport Plan guidance, ensuring access to protected landscapes will also require coordination with and funding from DLUHC and DfT and there are also significant opportunities to support access by engaging with DfE and DHSC. Inter-departmental coordination is needed to facilitate journeys from local communities and schools to protected landscapes for the benefit of nature, climate, health and wellbeing, education, and local prosperity.

National Parks and AONBs have the potential to be extraordinary places for nature and to make a crucial and genuine contribution to nature's recovery and to the 30x30 target. We welcome the Government's acknowledgment that National Parks and AONBs in their entirety should not count towards the 30% target. Only those sections of protected landscapes that ensure protection against harm, effective management for nature and are in good or recovering condition, as demonstrated by regular monitoring, should count towards the 30%.

Implementing the Glover Review recommendations to strengthen the purposes and Management Plans for nature's recovery will support portions of protected landscapes in meeting the 30x30 criteria, but the Government must also ensure these areas are effectively protected, managed for nature, and in good condition. The area of high quality semi-natural habitat in National Parks and AONBs should be expanded to cover [40% of these landscapes \(an overall increase of 33%\)](#) by 2030. This target is in line with scientific evidence which estimates that [a similar proportion of protected landscapes should be priority areas](#) for meeting the 30x30 criteria, contributing around a third of the 30% target. This needs to be done sensitively to respect and enhance the local character and heritage, for example by helping to restore traditional farmed habitats such as wood pasture, hay meadows, orchards and floodplain meadows, which have been lost from these iconic landscapes. Restoring and creating habitat will also make a significant contribution to other objectives such as helping to store carbon, reduce flooding and improve air quality. It could also play a key role in helping to maintain resilient nature friendly farming businesses across these landscapes. In addition to creating more habitat, Defra should help fund better access to enable people to experience these areas safely and responsibly.

Protected landscapes can also make an important contribution through nature-based solutions to climate mitigation and adaptation. The restoration of wetlands in National Parks and AONBs can prevent flooding in urban areas. Peat bogs, many of which lie in National Parks and AONBs, and saltmarsh in coastal landscapes, if restored, can make a big contribution to climate mitigation. We would like to see the purposes, Management Plans and resources of National Parks and AONBs strengthened to address climate change and support their contribution.

Response to questions – submitted via email and via the online consultation form

1. Do you want your responses to be confidential? (Required)

- Yes
- **No**
- If yes, please give your reason:

2. What is your name?

Emma Clarke

3. What is your email address?

emma.clarke@wcl.org.uk

4. Where are you located? (Required)

- North East
- North West
- Yorkshire and The Humber
- East Midlands
- West Midlands
- East of England
- London
- South East
- South West
- **Other – Cover all of England**

5. Which of the following do you identify yourself as? (Required)

National Park Authority or the Broads Authority

- AONB team
- Local authority
- Other public body
- **Environmental NGO**
- Other NGO
- Professional body
- Academic
- Business
- Resident of a protected landscape
- Member of the general public
- Other
- If other, please identify below:

A stronger mission for nature recovery

6. Should a strengthened first purpose of protected landscapes follow the proposals set out in Chapter 2?

- **Yes**
- No
- Unsure
- Please give reasons for your answer:

Yes, we welcome the proposal for the first purpose of protected landscapes to be strengthened for nature's recovery. We agree with the purpose to 'recover' nature, beyond just 'conserve and

enhance.’ We also agree with the purpose to include a specific reference to ‘biodiversity.’ The detail of the wording of the new purpose will be important and we welcome further engagement from Government on this detail.

The Sandford Principle will have to be updated along with the purposes, reflecting that the evidence now tells us that the main driver of biodiversity loss is intensive land management. This is not something that was envisaged when protected landscapes were first created or when the Sandford Principle was first established. The updating of this principle should make it clear that, as advised by the IUCN’s principles for Protected Areas, where there are conflicts between nature and cultural values, nature will be the priority. As advised by the IUCN, the law should go further and give the protected landscape authority and other relevant authorities a duty to seek to prevent, or eliminate where necessary, any activities that are harmful to nature in the protected landscape, such as overgrazing, tree planting in places that would damage biodiversity and the burning of peat. While there will sometimes need to be areas in which people’s access and use is carefully managed, the Sandford Principle should not be misinterpreted to exclude peaceful public access where it is not causing any damage or disturbance to nature.

We agree with the Government that the existing duties for public bodies to ‘have regard’ to the statutory purposes are too weak. Instead, public bodies should be required to ‘further’ the statutory purposes of protected landscapes so that they are given greater weight when exercising public functions.

We also recommend that there is a duty for Natural England to monitor, assess and report on the implementation of the updated principle to ensure its effectiveness. The Sandford Principle should also be applied to AONBs and consideration should be given to how the Sandford Principle should apply in the Broads.

7. Which other priorities should be reflected in a strengthened first purpose e.g. climate, cultural heritage?

In addition to nature, natural beauty/landscape, climate (mitigation and adaptation) and cultural heritage should be included in any amended purposes.

However, as stated in answer to question 6, these purposes must be carefully defined and the Sandford Principle updated to ensure that these purposes are not interpreted in a way that would interfere with nature’s recovery, e.g., to defend intensive land management such as justifying overgrazing, peatland burning or tree planting in places that would damage biodiversity. The Sandford Principle should also be applied to AONBs and consideration should be given to how the Sandford Principle should apply in the Broads.

Agricultural transition

8. Do you support any of the following options as we develop the role of protected landscapes in the new environmental land management schemes? Tick all that apply.

- **Designing the environmental land management schemes in a way that works for all farmers and land managers, including the specific circumstances for those in protected landscapes, recognising that farmers in these areas are well-placed to deliver on our environmental priorities.**
- **Using Local Nature Recovery Strategies to identify projects or habitats within protected landscapes.**

- Reasoning, if space to provide: Agree, Local Nature Recovery Strategies must be used to identify projects or habitats within protected landscapes. This is why the Local Nature Recovery component and Landscape Recovery component of ELM need to be spatially prioritised. LNRs cannot be delivered against at-scale in the foreseeable future without ELM schemes, which act as the delivery mechanism. Therefore if LNRs are to identify habitats and projects in protected landscapes, it is vital that Local Nature Recovery and Landscape Recovery are also spatially targeted.
- **Monitoring the effectiveness and uptake of the new environmental land management schemes in protected landscapes. Using this to inform whether further interventions are needed to ensure we are on track for wider nature recovery ambitions.**
 - Reasoning, if space to provide: Agree with an ever-evolving ELM scheme learning should be ongoing, however, schemes must still be ambitious from day 1.
- **Creating a clear role for protected landscape organisations in the preparation of Local Nature Recovery Strategies. Our recent LNR consultation specifically asks for views on the role of different organisations in the preparation of LNRs, including protected landscapes.**
 - Reasoning, if space to provide: AONBS and National Parks should be on the governance structure for LNRs (which they will be) and nature recovery management plans ensure connectivity.
- **Building on FiPL, empowering protected landscapes to support decision-making and delivery against agreed priorities, including through dedicated project coordinators and advisers.**
 - Reasoning, if space to provide: We need to build on and learn from FiPL. Currently, the lack of clear objectives is resulting in funding being directed to poorly designed interventions. This needs to be addressed going forward in the design of ELM schemes, this could be through better resourcing of National Parks and AONBs to provide more in-house advice and project coordination, provided via ELM, or through a specific Government-funded advisory service.

9. Do you have any views or supporting evidence you would like to input as we develop the role of protected landscapes in the new environmental land management schemes?

The majority of land in National Parks and AONBs in England is farmed. The science shows that [agriculture has been the key driver of biodiversity loss](#) in the UK over the past 45 years. While protected landscapes provide many benefits for nature and climate, they are struggling to achieve the level of recovery for nature and improvements for the public that are needed. Unfortunately, nature is in a similarly poor state within protected landscapes as it is outside of them, often despite the best efforts of those responsible for and working with these landscapes. [Many areas of semi-natural habitat in National Parks have been lost](#), for example due to the use of pesticides and fertilizers, reseeded of grasslands, overgrazing or overwinter grazing. However, many farmers are increasingly looking to pursue more nature-positive farming practices and [evidence shows that this will bring business benefits](#), although they need the right tools and support to do so.

Environmental Land Management (ELM) should be a key driving force in bringing protected landscapes, especially protected wildlife sites within them and other areas of priority habitats, up to favourable or actively recovering ecological condition. ELM needs to deliver high outcomes for nature across the board in order to have a positive impact in protected landscapes. Farmers and land managers in protected landscapes will be eligible for three ELM schemes (Sustainable Farming Incentive (SFI), Local Nature Recovery (LNR) and Landscape Recovery (LR)). However, due to their designations, National Parks and AONBs should be managed as a gold standard for nature, especially

if they are to contribute to the government target of at least 30% of land (and sea) protected for nature by 2030 (30x30). Therefore, there must be targeted engagement with farmers and land managers in protected landscapes to encourage them into higher ambition schemes (LNR or LR).

More detailed environmental (SMART) targets, detailing contributions to overall environmental targets such as 30x30 and the species abundance target, including with protected landscapes, should be introduced as part of ELM. Government, including through the national outcomes for protected landscapes set by January 2023 and the outcomes framework that will be developed by NE, should encourage protected landscapes to maximise their commitment and contribution to improving and expanding the amount of semi-natural habitat with a national intention of having at least 40% of protected landscapes nationally covered by high quality semi-natural habitat. For example, the Cotswolds AONB has recently adopted a [Nature Recovery Plan](#) that aims at 40% good quality habitat for nature, in line with [scientific evidence suggesting that 40% of National Parks and AONBs should be semi-natural habitat. This would](#) enable these large areas of National Parks and AONBs to contribute to the development of resilient ecological networks and contribute to the Government's commitment to protect and manage at least 30% of land by 2030. Protected landscapes should also be encouraged to set targets for wilder areas, with a focus on restoring a wide range of natural processes, habitats, and missing species to form mosaics of native forest, peatlands, heaths, species-rich grasslands and wetlands. For example, [Exmoor National Park has pledged to create 7000 hectares](#) (10% of the Park) of nature recovery opportunity areas where nature and natural processes are allowed to take their course. Restoring and creating habitat will also make a significant contribution to other objectives such as helping to store carbon, reduce flooding and improve air quality. It could also play a key role in helping to maintain resilient nature friendly farming businesses across these landscapes. In addition to creating more habitat, Defra should help fund better access to enable people to experience these areas safely and responsibly, including through ELM.

The design of ELM must be fit-for-purpose to support land managers and farmers to support and recover nature at the scale that is needed and to meet its contributions to the Government's environmental commitments. With an ever-evolving ELM scheme learning should be ongoing, however, schemes must still be ambitious from day 1. Currently, the Sustainable Farming Incentive or Local Nature Recovery schemes alone are [unlikely to ensure that these landscapes are managed for nature](#) and monitored to ensure nature is in good or recovering condition. The Sustainable Farming Incentive schemes will need to be improved to be fit-for-purpose, particularly for farms in protected landscapes. For instance, while the introductory level of the Moorland and Rough Grazing scheme under the Sustainable Farming Incentive may be aimed at farmers in upland areas, many of which are in protected landscapes, the current measures only require monitoring and assessment, rather than environmental outcomes. This will not in and of itself achieve the step-change in environmental management needed to get protected landscapes up to scratch for nature.

To realise the potential of protected landscapes for nature recovery, it will be important to take more of a landscape scale approach to projects under ELM. As well as the LR component, it would be good to see support for things like cluster farms and local facilitators under LNR to encourage more land managers to work together within the landscape.

Therefore, mechanisms and funding streams other than Local Nature Recovery and the Sustainable Farming Incentive will need to be in place to ensure that farms in protected landscapes can deliver for nature and help contribute to the Government's environmental targets. For example, we need to build on and learn from FiPL. Currently, the lack of clear objectives is resulting in funding being directed to poorly designed interventions. This needs to be addressed going forward in the design of ELM schemes. This could be through better resourcing of National Parks and AONBs to provide more

in-house advice and project coordination, provided via ELM, or through a specific Government-funded advisory service.

There is also a strong need for monetary provisions through ELM, plus advice and guidance for NPAs and AONBs teams, for access and heritage components in all three ELM schemes, given particular visitor pressures in protected landscapes. National Parks and AONBs attract over 260 million visitors a year. Access to these landscapes is vitally important, but the volume of usage in these landscapes means that it is paramount that both funding is available for maintaining and enhancing access ways, as well as for ensuring that the right advice and support is in place to ensure that access is responsibly managed. Likewise, a third of England's national monuments are in the uplands, many of which are in protected landscapes. Proper funding and expertise for preserving these alongside good nature management must come through ELM.

National Park Authorities and AONB teams have an important role to play in ensuring the success of ELM. They should aim, as a minimum, for all priority habitats inside their boundaries to be well-managed for nature. They should also encourage and support all farmers within their boundaries to enter into LNR or LR agreements so that the wider countryside is more hospitable to nature, helping species to expand their range and adapt to climate change, as well as delivering wider environmental benefits across the landscape. They should seek to achieve this by providing nature-friendly, low intensity farming advice and support, facilitating uptake especially of clusters of farmers and contributing to the monitoring the effectiveness of schemes. NPAs and AONB teams should help develop Local Nature Recovery Strategies (LNRs) in their area.

LNRs should also help join up National Parks and AONBs with ELM. For example, LNRs should be used to identify priority projects or habitats within protected landscapes and should be joined up with National Park and AONB Management Plans. The Local Nature Recovery component and Landscape Recovery components of ELM should be spatially prioritised towards these LNRs-identified areas, presumably many of which will be in protected landscapes.

ELM should also support natural flood management and management of the water environment in national landscapes. There will be many pressures on the water environment in these landscapes (including from leisure), so farmers would benefit from help in prioritising and selecting effective management options. National Parks and AONBs are well-placed to support a large-scale systems-based approach to water environments. These landscapes offer key opportunities to deliver nature restoration, agroforestry, regenerative agriculture, wetland restoration, etc., to reduce pressure on the water environment and wider environment, given the landscape, nature and rural economy drivers for protected landscapes.

Finally, environmental data from regular monitoring and for reporting will be essential to ensure the delivery of ELM schemes and to monitor the contribution of ELM schemes and protected landscapes to environmental targets and ambitions. There is a need for more resources and joined up approaches between ELM, Local Nature Recovery Strategies, NGOs, Natural England, and Defra's Natural Capital and Ecosystem Assessment project. Environmental data collected as part of monitoring and reporting can then contribute to the environmental evidence base going forwards to help inform future policy and decision-making.

A stronger mission for connecting people and places

10. Should AONBs have a second purpose relating to connecting people and places, equivalent to that of National Parks?

- **Yes**
- No
- Unsure
- Please give reasons for your answer:

Yes, we welcome the proposed second purpose for AONBs on connecting people and places, equivalent to that of National Parks.

AONBs already do lots for connecting people and places and we welcome the Government's recognition through this proposal and their proposal for new AONBs that AONBs have the potential to facilitate more access to nature for people. However, AONBs need the powers and resources to deliver on this potential and this proposed additional purpose.

Increased long-term core resources for AONBs are necessary to make up past funding shortfalls and to enable them to deliver at the scale needed.

11. Should a strengthened second purpose of protected landscapes follow the proposals set out in Chapter 3 to improve connections to all parts of society with our protected landscapes?

- **Yes**
- No
- Unsure
- Please give reasons for your answer:

Yes, we welcome a strengthened second purpose to improve connections of all parts of society with protected landscapes. Again, the wording of the strengthened second purpose will be important and we welcome further engagement with Defra on this detail. In particular, we would welcome a reference to 'improving health and wellbeing' and that a reference to 'special qualities' should be retained to ensure the purposes can be locally specific to each protected landscape.

The Sandford Principle must be updated along with the purposes, so that the second purpose is pursued in a way that is not counter to any other purposes, e.g., biodiversity and nature's recovery. While there will sometimes need to be areas in which people's access and use is carefully managed, the Sandford Principle should not be misinterpreted to exclude peaceful public access where it is not causing any damage or disturbance to nature. We recommend that there is a duty for Natural England to monitor, assess and report on the implementation of the updated principle to ensure its effectiveness. The Sandford Principle should also apply to AONBs and consideration should be given to how the Sandford Principle should apply in the Broads.

We agree with the Government that the existing duties for public bodies to 'have regard' to the statutory purposes are too weak. Instead, public bodies should be required to 'further' the statutory purposes of protected landscapes so that they are given greater weight when exercising public functions.

With these strengthened first and second purposes of National Parks, and strengthened first and additional second purposes of AONBs, additional and long-term funding is needed to help make up existing funding shortfalls and deliver on these strengthened and new statutory purposes.

In particular, in addition to increased core funding for National Parks and AONBs to take forward their strengthened statutory purposes, there is a need for long-term funding, rather than project grants, for important programmes such as Generation Green and the Mosaic project which engage partners beyond National Parks and AONBs. While it was welcome to see the Generation Green project referenced as an example of success in the Government's response to the Glover Review, we were disappointed that no funding was proposed to take this project forward. Another example is Campaign for National Parks' Mosaic project, a long-term engagement program to increase the diversity of visitors to protected landscapes. While the Glover Review recommended support for these types of long-term engagement programmes, the Government has not made any commitment to this.

In general, while Government's proposals for a strengthened second purpose on access for National Parks and for AONBs are welcome, there is much more that National Parks and AONBs can and should be doing to connect people with protected landscapes. The original Glover Review had a strong vision for connecting people with protected landscapes and Link is concerned that the Government's response to the Glover Review lacked ambition in this area, failing to pick up on many of Glover's recommendations on access and engagement. We feel this is a missed opportunity to set a clear direction towards which Government and all partners could work, and to develop concrete proposals to increase the provision of access, facilitate access and connect people, and to increase the diversity of visitors to protected landscapes.

The Government could do much more to connect all parts of society with protected landscapes by:

- Increasing the provision of public access through ELM, by including access considerations and funding for access in the design and delivery of Environment Land Management schemes.
- Extending public rights of way, creating and maintaining routes and trails, and connecting up routes in order to create a network of landscapes that are properly connected for nature and people. We welcome the commitment for better join up with National Trails, but there were no concrete commitments to delivering better provision and connection of access on the ground.
- Facilitating access within protected landscapes, through better, more welcoming signage, including the Countryside Code, and more visitor and ranger services (as recommended by the Glover Review), to help people navigate, use responsibly, learn, and feel comfortable in protected landscapes. We disagreed with the Government's emphasis in their response to the Glover Review on rules and enforcement, rather than on engagement, education and empowerment.
- Improving access to protected landscapes by concrete proposals to improve and fund public transport to help people get to National Parks and AONBs, including commitments from other Government departments (DLUHC and DfT) to collaborate to deliver access effectively.
- Increasing the diversity of visitors to protected landscapes. Especially given the Government's Levelling Up agenda, we were disappointed with the lack of proposals in the Government's response to the Glover Review on supporting access to protected landscapes for a wider variety of visitors, especially people from deprived areas and ethnic minority groups. The consultation did also not consider the diversity of boards and the systemic changes needed to increase the diversity of people on National Park and AONB boards. Increasing the diversity of boards is essential to having a variety of lived experiences and expertise involved in decision-making to change power dynamics and ensure equitable access to protected landscapes.
- Connecting people with nature near where they live, all the way out to large patches of nature in protected landscapes. Many people do not have access to nature-rich spaces close to where they live. We know that connecting people with nature brings many health and

wellbeing benefits and puts people on a lifelong journey to enjoy nature, from their doorstep to National Parks. As many urban environments are centred on river systems, habitat restoration and water quality improvements of rivers and canals offers a unique opportunity to deliver access to nature close to where people live, especially in nature-deprived neighbourhoods where people on lower incomes and minority ethnic people are more likely to live. Levelling up access to nature for everyone through more nature everywhere, more urban nature and more AONBs is important for nature and people. Link has recently launched the Nature for Everyone campaign, calling for legal changes to the forthcoming levelling up legislation to improve access to nature for all.

- Improving the richness of nature within protected landscapes. Currently the state of nature inside protected landscapes is not any better than the countryside outside them. By restoring and enhancing nature, protected landscapes can facilitate wildlife tourism, improve education and connection with nature, and boost health and wellbeing even further. Nature also benefits, as evidence shows that connecting people with nature leads to pro-environmental behaviours and increased public support for nature recovery.

12. Are there any other priorities that should be reflected in a strengthened second purpose?

No reply

Managing visitor pressures

13. Do you support any of the following options to grant National Park Authorities and the Broads Authority greater enforcement powers to manage visitor pressures? Tick all that apply.

- Issue Fixed Penalty Notices for bylaw infringements
- Make Public Space Protection Orders (PSPOs)
- Issue Traffic Regulation Orders (TROs) to control the amount and type of traffic on roads
- Please give reasons for your answer:

Given the new, strengthened purposes of National Parks and AONBs, National Park and AONB teams should focus their constrained resources on delivering on these purposes, rather than taking on duties and burdens that sit better with local councils and could divert resources elsewhere. From a nature perspective, National Park and AONB teams need to tackle intensive land management such as overgrazing or peatland burning, which is a much larger issue than visitor pressures. However, there may be merit in additional powers where they would lead to reduced burdens on National Park and AONB teams as this would allow more resource to be focussed on delivering for nature, climate and people.

In general, managing visitor pressures should be primarily about proactive management to encourage safe and responsible enjoyment of protected landscapes, including through increased, welcoming signage, promotion of the Countryside Code and visitor services, including ranger services, rather than additional rules and enforcement.

14. Should we give National Park Authorities and the Broads Authority and local highway authorities additional powers to restrict recreational motor vehicle use on unsealed routes?

No reply

15. For which reasons should National Park Authorities, the Broads Authority and local authorities exercise this power? (select all that apply)

No reply

16. Should we legislate to restrict the use of motor vehicles on unsealed unclassified roads for recreational use, subject to appropriate exemptions?

No reply

17. What exemptions do you think would be required to protect the rights and enjoyment of other users e.g., residents, businesses etc?

No reply

The role of AONB teams in planning

18. What roles should AONBs teams play in the plan-making process to achieve better outcomes?

We support the proposal in the Glover Review that AONBs should work with local authorities to develop specific policies in local plans, which are upheld in decision making. Local planning authorities for areas inside AONBs should have a development plan document as part of the Local Plan that deals with planning in the AONB. This should be produced in partnership with the AONB. This is already the case, for example, in the Arnside and Silverdale AONB.

AONB teams are small and under-resourced, and will require additional resources, capacity and expertise, to make their important contributions to the plan-making process and planning system. This must include as a minimum a dedicated full-time planner and access to expert advice, for example ecological and nature-friendly design advice.

19. Should AONB teams be made statutory consultees for development management?

- **Yes**
- No
- Unsure
- Please give reasons for your answer:

Yes, we agree with the proposal to make AONBs statutory consultees for development management.

While in theory AONBs have the same status in the planning system as National Parks, in practice they often do not receive the same level of protection. This is largely because they do not have a separate planning authority, with responsibility for both plan-making and planning decisions, as National Parks do. This proposal to make AONBs statutory consultees in the planning system would ensure AONBs are formally consulted on relevant planning cases and have a strengthened voice in the decision-making process.

However, it must be recognised that for AONBs to have capacity to respond formally to planning cases in their areas, they will require additional resources (this was also identified as an issue in the

Glover Review). This must include as a minimum a dedicated full-time planner and access to expert advice, for example ecological and nature-friendly design advice.

For example, lessons can be learned from Natural England's role as statutory consultee for AONBs; NE too often lacks the resources or the local expertise to express an opinion in many cases. But when NE does not respond to a planning case this can be taken as consent, increasing the vulnerability of AONBs.

A more holistic approach to planning in AONBs is needed, to reduce their vulnerability to speculative and unsustainable development.

In particular, there is an opportunity for AONBs to contribute further to water management through their role as LPAs. When granting planning consent, protected landscapes could drive the delivery of Natural Flood Management (NFM) and Sustainable Drainage Systems (SuDS). There is a strong case to adopt techniques that Work with Natural Processes (WwNP) given the importance of landscape in these areas.

20. If yes, what type of planning applications should AONB teams be consulted on?

- AONB teams should formally agree with local planning authorities which planning applications should be consulted on.
- **AONB teams should be consulted on all planning applications that require an Environmental Impact Assessment and are categorised as 'major development' as well as Nationally Significant Infrastructure Projects.**
- **Other (please state)**

AONB teams should be consulted on all planning applications that require an Environmental Assessment and are categorised as 'major development', as well as NSIPs.

AONB teams should also be consulted on any planning application that they think they need to in order to achieve their purposes, *without having to formally agree* with the local planning authorities (as suggested by the first option in this question).

Local governance

21. Which of the following measures would you support to improve local governance? Tick all that apply.

- **Improved training and materials**
- **Streamlined process for removing underperforming members**
- **Greater use of advisory panels**
- Greater flexibility over the proportion of national, parish and local appointments
- **Merit-based criteria for local authority appointments**
- **Reduced board size**
- Secretary of State appointed chair
- **Other (please state)**
- Please give reasons for your answer:

To deliver better for nature, climate and people, the governance of National Parks and AONBs needs to be improved so that people on the boards have expertise (professional and lived experience) across the National Park and AONB statutory purposes, including biodiversity, landscape and access. Currently, there are not enough people on the boards with adequate expertise. While Link supports

several of the proposals in this consultation on local governance, these proposals will not be sufficient to address and change this fundamental problem of a lack of expertise on boards. In addition, increasing the diversity of boards is an important issue, and there is nothing proposed to tackle this lack of diversity.

We need changes in how people are appointed to boards. A much greater proportion of board members should be appointed for their expertise in protected landscapes' purposes by amending the current legislative requirements for 75% of most boards to be appointed from local councillors. The proportion of members who are councillors should be significantly reduced to allow for greater expertise and diversity on boards, and so that there are more outside voices. We would like to see the Government explore the possibility of a process for locally-appointing board members from outside the pool of local councillors based on a merit-based application process. Otherwise, we would support increasing the proportion of members who are appointed by the Secretary of State nationally based on merit to at least 50% of boards, which should where possible result in the appointment of people with a strong local connection. This would also help with diversity. The legislation should also require that there is an overall balance between the different areas of expertise as it does for the Broads Authority.

We do not agree with the proposal for greater flexibility in how to appoint members if this could lead to even fewer nationally-appointed members on some boards.

There are other reforms outlined in the Government's response that we support but which are not consulted on in this question, i.e., standard role profile, a shared code of conduct, regular skills audits, performance reviews and fixed-term appointments. Changing where and how the posts are advertised could also help ensure appropriate expertise and increase diversity on boards.

A clearer role for public bodies

22. Should statutory duties be strengthened so that they are given greater weight when exercising public functions?

- **Yes**
- No
- Unsure
- Please give reasons for your answer:

Yes, the duty should be strengthened from the existing duty to 'have regard to' to a duty to 'further' the purposes of protected landscapes.

23. Should statutory duties be made clearer with regards to the role of public bodies in preparing and implementing management plans?

- **Yes**
- No
- Unsure
- Please give reasons for your answer:

Management Plans should have clear links with the Environment Act 2021 and the 25 Year Environment Plan targets and they should have a clear and robust monitoring and reporting framework. There should be more specific targets and deliverable actions for nature restoration set out in National Park and AONB Management Plans, along with the policies and funding to achieve these.

We agree with Government that the current duties are not clear that public bodies are expected to contribute to the delivery of management plans. Relevant public bodies should be given a duty to support the development and implementation of the Management Plan and report on how they are achieving this and designated landscape bodies should be required to coordinate and report on the overall implementation of the Management Plan.

Public bodies should also have a duty to report on how they are implementing this duty (to prepare and implement Management Plans), and the duty under question 22 (to 'further' the purposes of protected landscapes when exercising public functions). Natural England should be required to monitor this reporting from public bodies and provide national reporting – holding National Park Authorities, AONB teams and public bodies accountable.

Natural England should be given a strengthened role, and the resources to fulfil that role, to scrutinise and approve the Management Plans to ensure they are robust and making a genuine contribution to national targets.

Environmental data from regular monitoring will be essential to monitor the contribution of protected landscapes to environmental targets and ambitions. There is a need for more resources and joined up approaches between ELM, Local Nature Recovery Strategies, NGOs, Natural England, and Defra's Natural Capital and Ecosystem Assessment project.

As well as being informed by and contributing to a shared environmental evidence base, there are several other ways that Management Plans should be joined up with Local Nature Recovery Strategies. NPAs and AONB teams should help develop LNRSs in their area. LNRSs should be informed by the content of Management Plans. Management Plans should also include relevant content from the LNRS, identifying where the National Park or AONB can deliver LNRS priorities, setting out targets and actions, allocating actions to organisations, and conducting regular monitoring and reporting of progress.

Join up of Management Plans with LNRSs should also help integrate National Parks and AONBs with ELM. The Local Nature Recovery and Landscape Recovery components of ELM should be spatially prioritised towards these LNRS-identified areas, presumably many of which will be in protected landscapes.

We also want to flag the opportunity for Management Plans to embed a large-scale systems-based approach to water environments. National Parks and AONBs are well-placed to lead on collaborative scheme development and delivery given their convening role and their role as a local planning authority. We recommend that the guidance for developing Management Plans includes advice on taking a Catchment-Based Approach to the water environment and contributing to deliver River Basin Management Plans (RBMPs), explicitly identifying their contribution to actions within RBMPs in Management Plans. Through their role as LPAs in granting planning consent, protected landscapes could drive the delivery of Natural Flood Management (NFM) and Sustainable Drainage Systems (SuDS), including through restoration of wetland habitats. There is a strong case to adopt techniques that Work with Natural Processes (WwNP) given the importance of landscape in these areas.

General power of competence

24. Should National Parks Authorities and the Broads Authority have a general power of competence?

- **Yes**
- No
- Unsure
- Please give reasons for your answer:

Yes, the National Parks Authorities and the Broads Authority should have a general power of competence, but only if implemented alongside checks, such as other measures in this consultation for strengthened purposes and the updated Sandford Principle, to ensure that the general power of competence is not misused and does not lead to the over-commercialisation of National Parks and AONBs.

There is a limited role for private finance in improving protected landscapes for nature, climate and people. We are concerned about the strong emphasis on private finance in the Government's response to the Glover Review. There is a risk that private finance could drive certain interventions over others and not support the interventions that are most needed. As well, many ecosystem markets will not be developed enough to support landscapes in the near future and to meet the Government's environmental targets for 2030.

Increased, long-term public funding for protected landscapes is essential including doubling AONB funding as recommended in the Glover Review. National Parks and AONBs are key national assets delivering public goods such as nature, climate, health and wellbeing. Public funding to deliver their statutory purposes is crucial. Any private finance should be additional, rather than replacing, the public statutory funds for protected landscapes, nature, climate and people.

As well, if given a general power of competence, the role of NPAs and AONB teams versus local councils must be clear. NPAs and AONB teams must deliver the key statutory purposes of the landscapes, and the general power of competence must not distract from this delivery.

Other

25. If you have any further comments on any of the proposals in this document, please include them here.

* Please see the general points in the covering letter above.*