



EAST DEVON

Area of Outstanding Natural Beauty



Designated Landscape Review

EAST DEVON AONB PARTNERSHIP RESPONSE

14 DECEMBER 2018

Overview

The government has asked for an independent review of England's National Parks and Areas of Outstanding Natural Beauty (AONBs). You can find more about the work of the review and our Terms of Reference. Already the review team, led by Julian Glover and a panel with a range of experiences and interests, has carried out visits and meetings in many parts of England.

We will do more in the months ahead - but we want everyone to have a chance to contribute, whether you live in a National Park or AONB, run a business in them, enjoy visiting, care about landscapes and biodiversity, or represent an organisation with views that might shape and improve our findings. The questions are a guide: please do not feel you must answer them all – or have to write at great length. We have not set a word length on answers, as we know some people and organisations will want to reply in detail on specific points. However, we ask that where possible you keep each individual answer to no more than 500 words. It is not necessary to reply to every question so please ignore those which you do not think relevant to you. You may find it easier to write your answers elsewhere before pasting them into the text boxes which follow.

Introduction

1. Are you replying as a member of the public or on behalf of an organisation?

Organisation

2. If you are replying as a member of public

a) What is your name?

b) What is your email address?

If you enter your email address then you will automatically receive an acknowledgement email when you submit your response. We may also use this to contact you further.

c) Please tick all that apply

- I live in a National Park or AONB
- I work in a National Park or AONB
- I visit a National Park or AONB

3. If you are replying on behalf of an organisation or organisations

a) Which organisation(s) – East Devon AONB Partnership

b) What is your name and position – Chris Woodruff – AONB Manager

c) What is your email address – chris.woodruff@eastdevonaonb.org.uk

4. We would like to be able to use extracts from submissions in our final report. If you would not like them, potentially, to be made public, please tell us here. (Required)

- Yes, I'm content for you to use extracts of my response in the final report

5. We have obligations under freedom of information laws and there is more information below. For the purposes of these laws, would you like your response to be confidential? (Required)

- No

Confidentiality and data protection information

Information in responses to this call for evidence may be subject to release to the public or other parties in accordance with the access to information law (these are primarily the Environmental Information Regulations 2004 (EIRs), the Freedom of Information Act 2000 (FOIA) and the Data Protection Act 2018 (DPA)).

Defra / The Review may publish the content of your response to this call for evidence to make it available to the public without your personal name and private contact details (e.g. name, email address, etc).

If you say 'Yes' you want your response kept confidential, please clearly state what information you would like to be kept confidential and why. This is to help us balance these obligations for disclosure against any obligation of confidentiality. If we receive a request for the information that you have provided in your response to this consultation, we will take full account of your reasons for requesting confidentiality of your response, but we cannot guarantee that confidentiality can be maintained in all circumstances.

If you click on 'No' in response to the question asking if you would like anything in your response to be kept confidential, we will be able to release the content of your response to the public, but we won't make your personal name and private contact details publicly available.

Before anything else

6. We would love to know what makes National Parks and AONBs special to you

We invite you to submit a recent picture which sums up what is special to you about our designated landscapes. It could be a place, a person, on a farm or of plants and wildlife. If you submit a photo, you must own its copyright and it may be used in the final report or online. Please tell us if that is OK.

- Yes, you can use the supplied photo(s) online or in the report

Part 1 - Opening thoughts

We would like any opening thoughts on the role played by National Parks and AONBs - you may want to make a more detailed suggestion further on.

7. What works overall about the system of NPs and AONBs in England. Add any points that apply specifically to only NPs or AONBs

The designations of AONBs and National Parks (NPs) will have been in existence for 70 years in 2019. Recognised as nationally important landscapes, they are regarded by many as our most special landscapes – full of beauty, character and opportunity. They have retained their beauty and individual character in large part as a result of farming practices, but also through planning protection and targeted programmes associated with their status as areas to be conserved and enhanced for their natural beauty, culture and wildlife.

The establishment of National Park boards and AONB Partnerships, with associated staffing/teams and services, has served to focus and target management of these areas since 1949 for environmental, but also for economic and social purposes.

For AONBs, the Partnerships are recognised as a locally representative apolitical and accountable Partnership - supported by local and national funding and working for the benefit of the AONB as a whole. There is no other body that has this purpose and for that reason, they are unique.

AONB Partnerships are supported by mostly small teams – just 2.5fte in our case - of experienced and locally knowledgeable officers, many of them with a long track record and excellent network of contacts and relationships in the area. These AONB Partnerships and their supporting teams have facilitated, coordinated and delivered millions of pounds of investment programmes with local communities, farmers and businesses that have served to conserve and enhance these nationally important landscapes.

The teams and Partnerships deliver the AONB Management Plans that have been adopted by the constituent local authorities of the AONB. These statutory plans are the link back to the statutory purposes of designation and they are regularly reviewed. There are no other plans that are specifically produced for the AONB area and for that reason these AONB wide plans are key to targeting and influencing action and activity for the purposes of designation of AONBs.

Few if any AONBs hold land and therefore have no direct delivery role to effect change. Instead, much of what they do is in partnership with others through projects, plans, funding, facilitation and influence. AONBs have been extremely effective at this and have used HLF, EU, local charity, local authority, government agency and the Sustainable Development Fund as a tool for supporting and effecting action.

8. What do you think does not work overall about the system and might be changed. Add any points that apply specifically to only NPs or AONBs

Whilst the central/local government funding arrangement has largely worked well, it has been inevitably hit by the austerity measures applied to public sector funding over the last 10 years. AONB Partnerships have adapted to this well and trimmed their costs and adjusted their delivery models accordingly – at some cost to capacity in a number of cases.

Whilst the AONB Management Plans are Statutory, the weight applied to their status is not commensurate with this requirement. Furthermore, the funding agreements developed through national/local partnership is not aligned to the Management Plan period.

A perception exists that the 'protection' afforded in National Parks is greater than that in AONBs. This also leads to a lack of recognition across relevant authorities and the public at large that AONBs are areas of equal landscape and environmental worth and importance; in this respect National Parks have a greater public profile.

Recommended changes

- Greater weight is placed on the Duty of Regard (Section 85 CROW Act) for relevant authorities.
- Consideration should be given to affording statutory weight to the implementation of the AONB Management Plans; for example, provided they are in conformity, potentially form a Supplementary Planning Document as part of the Local Development Plan.
- The Defra/LA funding agreement is tied into the statutory plan period eg 5yrs for AONBs

Part 2 - Views

9. What views do you have about the role National Parks and AONBs play in nature conservation and biodiversity?

The position with regard to AONB's is not as clear cut as for National Parks, which are legally required to conserve and enhance wildlife. Wildlife considerations are not included in the primary purpose of AONB's or clearly enough articulated in the 'natural beauty' criterion upon which they are designated.

Recommendation

To be fully effective, AONBs need this purpose to be articulated in their purposes of designation and to be taken appropriately into account by decision makers. Clearly aligning the primary/first purpose of AONBs and National Parks would make it unequivocal:

'to conserve and enhance the natural beauty, wildlife and cultural heritage'

Few if any AONBs hold land and therefore have no direct delivery role to effect change. Instead, much of what they do is in partnership with others through projects, plans, funding, facilitation and influence. AONBs have been extremely effective at this and have used HLF, EU, local charity, local authority, government agency and the Sustainable Development Fund as a tool for supporting and effecting action for nature conservation and biodiversity. An excellent example of a collaborative project initiated, supported and chaired by East Devon AONB is the [Devon Greater Horseshoe Bat project](#) which is managed by a key AONB partner, Devon Wildlife Trust.

In addition, many AONB teams have acted as agents for government agencies, in particular for Natural England (NE), to deliver nature conservation programmes for priority habitats in the area. For us this has involved examples such as Catchment Sensitive Farming and Axe Invasives Project. There is opportunity to develop this locally influenced delivery more.

9 a) Could they do more to enhance our wildlife and support the recovery of our natural habitats?

AONBs could influence more change through local delivery and support of the new Environmental Land Management Scheme (ELMS) in their areas and in doing so provide a more joined up approach to landscape scale working. Some are already doing so through Farm Facilitation Groups (eg East Devon Farmers Group). NE are increasingly stretched and have been through repeated reshuffles which have undermined their continuity and, in some cases, local knowledge. This has meant that things such as Site Improvement Plans (SIPs) for Natura 2000 sites have almost become a paper exercise in many cases rather than a practical site management tool /mechanism for influencing enhancement and reaching favourable status.

We are aware there are some calls for coastal AONBs to adopt a wider remit to include the marine environment along their coasts. We are not of that opinion, but should it be considered we would expect it to be fully resourced. (We would also refer to our comment about impact risk zone under item 14 and the potential for coastal AONBs to have a consistent mean lower water boundary).

Recommendation

Subject to amending the AONB purposes to more explicitly include wildlife, consideration is given to enabling/resourcing AONBs to fulfil a key role in influencing and enhancing the management of statutory wildlife designations in their areas.

10. What views do you have about the role National Parks and AONBs play in shaping landscape and beauty, or protecting cultural heritage?

Our most powerful influence to date has been in helping develop and update local Landscape Character Assessments (LCA) and associated guidance as part of a consistent Devon-wide approach landscape character assessments for the wider area and its integration with the planning process. This has seen a sea change in the use of these assessments in the planning process over the last eight years and embedded recognition of landscape in planning decisions. We continue to drive and support this tool, although it's fair to say it has now become a more mainstream element of the development management process for protecting landscape character and in turn, cultural heritage.

We have worked with Historic England on a number of schemes and plans to effect improved outcomes for heritage in our area under such mechanisms as the Monument Management Scheme and the development of Historic Environment Action Plans (HEAPs) for the AONB; the latter has translated into Parish level HEAPs which has brought about community initiatives and local action.

In addition to a strong track record in HLF cultural project delivery that has brought about enhancements and activity to many of the components of landscape and its beauty, we host an Annual East Devon AONB Heritage Conference and a network of history/heritage groups in East Devon. This collectively serves to promote and raise awareness of the culture and heritage of the AONB, encourage engagement, drive local action and inspire change.

Recommendation

The conservation and enhancement of cultural heritage – a key element of the first purpose of England's National Parks, does not currently apply to AONBs. This omission should be addressed by aligning the first purpose of AONBs with that of National Parks by adding: 'to conserve and enhance the natural beauty, wildlife and cultural heritage'.

11. What views do you have about the role National Parks and AONBs play in working with farmers and land managers and how might this change as the current system of farm payments is reformed?

Over 20 years ago the former East Devon Heritage coast/countryside service was closely involved in encouraging farmers into the stewardship programme and the relationships established then lasts to today. Changes in delivery through the Countryside Agency and Natural England reduced this direct influence and as a result, since establishing the AONB unit in 2002, we had a less direct role in effecting change with farmers – in fact we were encouraged **not** to directly engage so as not to complete with other commercial advisors.

However, over the last 2/3 yrs this situation has changed; as the move for wider farmer partnerships, Natural England’s dwindling capacity to directly engage/deliver and a challenging environmental land management scheme has opened opportunity for evolution.

We now deliver a [Farm Facilitation Programme](#) in East Devon and have also recently delivered a [Princes Trust Countryside Fund Farm Resilience Programme](#) for family farms, focusing on business and family succession. These two areas of engagement have been warmly received and our neutral role in facilitating this activity has engendered trust and engagement. We have been supported in the latter by the Farming and Wildlife Advisory Group and Wildlife Trust.

In addition, through the EU LEADER programme, we have a broader understanding of the farmed environment as part of a wider rural economy. The AONB has played a central role securing the programme funding and directly in awarding farm productivity funding through the extremely successful LEADER programme [Making It Local](#). This programme has been the **top performing programme** in the country, largely as a result of long standing and locally effective delivery partnerships.

We can see a future environment where the AONB unit is resourced as a trusted independent agent for local delivery of targeted agri-environment schemes across the area as part of a wider tiered scheme. Alongside this approach, we also see **significant value** in retaining some form of our current East Devon Farm Facilitation Group across the AONB beyond its remaining funding period and using this to develop landscape scale approaches, closer working with farmer groups and encourage new ways of achieving tangible results under the new ELMS.

Recommendation

Sustainable farming is fundamental to the quality and character of our designated landscapes. AONBs should be priority target areas for working at a landscape scale with farmers and landowners. The level of facilitation for agri-environment scheme delivery should reflect the nationally important landscape status and include targeted rates of support.

12. What views do you have about the role National Parks and AONBs play in supporting and managing access and recreation?

The outstanding quality of landscape in AONBs is a major factor in their popularity for public access and recreation. Sustainable access and recreation is a key aspect to the management of the AONB and an important part of enabling healthy lifestyles. AONBs are on the whole close to centres of

population and have a network of extremely well used local footpaths that act as gateways and regular routes for public recreation. They are perhaps more regularly used than some of the more remote areas in some National Parks, where access is difficult and transport is often required.

The East Devon AONB encourages sustainable recreation through information and guides on local walks and themed walking routes. The team currently plays a lead role in the promotion of the [East Devon Way](#) on behalf of Devon County and East Devon District Councils although we have no direct rights of way responsibilities. This regional long-distance footpath was developed specifically to explore the beauty and diversity of the AONBs landscape. A number of local walks, associated with this route, have been developed in partnership with the local Ramblers group and local council. This is added value activity, provided over and above the AONB statutory purposes and is reflective of the unacknowledged value many AONBs partnerships provide in supporting and managing access and recreation – in effect fulfilling a National Park purpose.

Although tourism is not referred to under this question, access and recreation is fundamentally linked to tourism. Our work promoting local hospitality, food and drink, and business across the AONB linked to our [Ambassador](#) programme and the East Devon Way is playing an important role in the relationship between business and the landscape. Many who visit the AONBs use the footpath and access network and enjoy recreation such as kayaking, sailing, horse-riding and many other pursuits. They plan their visits often using the internet and look to find places to stay, eat and visit.

We are increasingly working with this visitor network to encourage understanding and appreciation of the landscape that attracts them and how the local businesses are playing their part in ensuring it remains outstanding. AONB's identification on Google maps has huge potential as a conduit to effective promotion of the areas and is a little used powerful tool.

The AONB has resourced and funded the development of a community driven Sidmouth and East Devon Walking Festival and created/promoted a number local walks and heritage trails either directly through project activity or indirectly through the [Sustainable Development Fund \(SDF\)](#).

Furthermore, our SDF funding has provided support to a wide range of access and recreation projects, including town trails, Walking for Health programmes, footpath enhancements, scout hut improvements, feasibility studies and many others. In the light of changes to farm subsidy regimes there would appear to be opportunities for further promoting the recreation role and potential that AONBs have to offer in the farmed landscape.

13. What views do you have about the way National Park and AONB authorities affect people who live and work in their areas?

This question appears to be about the organisations, rather than the designations.

As such the impact on those that live and work in the AONB will vary accordingly what aspect of activity you enquire about. Farmers, landowners, developers, businesses, individuals, homeowners will all be affected in a variety of ways and it is more appropriate to leave these parties to respond with their views on how the AONB Partnership affects them.

From the perspective of the AONB Partnership and team, our ethos is to seek to support, raise awareness, provide advice and enable good practice and activity that serves to conserve and enhance the area and provide for the well-being of its community. Where proposed development meets the National Planning Policy test of 'exceptional circumstances' yet may harm the area's

natural beauty, we seek to influence outcomes to ensure a sensitive design that enhances the landscape and contributes positively to its character.

However, we are not the planning decision-making body despite the view of some. Nor do we have responsibility for modifications to the AONB boundary much to the disappointment of others.

In terms of awareness and understanding, whilst AONBs have no defined purpose to promote opportunities for the understanding and enjoyment of the special qualities of the area by the public, we have done a tremendous amount of work in this area and to all intents and purposes are already fulfilling what is actually a National Park purpose, but without the additional resources.

A few examples of this include:

- 3 x 3yr HLF funded landscape heritage projects promoting the cultural heritage, special qualities and wildlife of the AONB;
- Securing £m's EU Rural Development Programme funding through [Making it Local](#)
- a wide range of interpretation, talks, walks, guided events
- support to local community action through our [Sustainable Development Fund](#).
- volunteer opportunities
- wide engagement in landscape based outdoor activity with school children/schools
- an AONB Ambassador network
- [Annual 'Acland' Awards](#) evening for exemplar activity across the AONB

Significantly, some AONBs, East Devon included, have played a key role in securing EU funding through LEADER and other rural redevelopment funding programmes to the benefit of local communities and businesses. Indeed, the Devon CC hosted Making it Local programme operating across East Devon and the Blackdown Hills AONBs is one of the top performing LEADER programmes in the country, largely as a result of continued success in securing the programme funding over 3 different programmes, but also because of the significant role the AONBs and local partners have played in collectively delivering across the area.

a) Are they properly supporting them and what could be done differently?

For further related comment see Q15

14. What views do you have on the role National Park and AONB authorities play on housing and transport in their areas?

Much has been reported about Net Gain recently and the outgoing Chair for NE, Andrew Sells, clearly sees this as a big opportunity for nature conservation and nature recovery areas. We endorse this principle and encourage the development of approaches that can ensure Net Gain supports nature recovery network development across AONBs.

East Devon AONB Partnership engages in housing and transport largely through the Local Plan and development planning process. We operate to a planning protocol with the local planning authorities and this duty is delegated to the AONB Manager as resources allow. Not all AONBs operate the same system of delegation and some AONBs have qualified planners in their teams. We do not and therefore fit planning consultations in alongside other priorities accordingly. This approach is not received well by some of our local community group representatives who consider we should be much more actively engaged in the planning process and watchdog for the AONB.

There is also, amongst some AONBs, an appetite to have a stronger/wider role in the planning process. In our case this could not be achieved without additional resources and we would suggest also, not without more weight being applied to AONB Management Plans and their policies in the Local Plan process – the two should go hand in hand.

There is, we believe, a case for AONBs to play a more active pre-application advisory role in planning and development (whether as a form of consultancy or in a resourced manner). We and some other AONBs are already acting in this way but there is scope to improve the ways of working provided this can be resourced effectively.

Because of our funding/small team size and roles, our focus has been more on influencing policy and developing or supporting the development of advice. We were closely involved with the wording and content in the Local Plan policy relative to AONBs in the East Devon Local Plan. We were also instrumental in the development and integration of the landscape character assessment for East Devon that is now fundamentally embedded in the development management process and which provides the landscape evidence base and supports development plan policies.

We have developed guidelines for equestrian development in the AONB and played an active part in the development of other advice and guidance documents through the extremely productive [Devon Landscape Policy Group](#) – producing landscape related guidance on Renewable Energy and Neighbourhood Planning. We are currently working with East Devon District Council on policy guidance for bats.

This more proactive/front end advisory approach to planning helps in influencing the right kind of development for NP/AONBs and is far more preferable to reacting/responding to ill thought through and poorly advised schemes with a limited staff resources and no planning officer.

Recommendation

Whilst challenging, there is scope to consider the issue of boundary/setting where much of the pressure is felt in AONBs/NPs, and the possible development of an agreed **‘impact risk zone’** for AONBs and NPs that could include the marine environment for coastal AONBs/NPs.

Part 3 - Current ways of working

We'd like to ask some specific questions about the way National Parks and AONBs work at the moment

15. What views do you have on the way they are governed individually at the moment? Is it effective or does it need to change, if so, how?

AONB Management Plans should continue to be locally accountable and managed and delivered by a broad partnership of interested parties who are trusted by local communities. In East Devon, the AONB's are managed efficiently and the partnership structure, combining a mix of expert officers, locally accountable elected members, government agencies, business organisations, farmers, landowner groups and estates, amenity groups and Ambassador representatives, provides an effective structure for managing priorities and coordinating projects. The continuity of this arrangement and the locally knowledgeable team is a critical factor in its success. So too is the fact that the Chairmanship has rotated over the years and been held by representatives of the NFU, local

amenity groups, and estate representatives (Clinton Devon Estates) as well as local council members; demonstrating an open approach and inclusive to governance.

If the 25 year Environment Plan objectives are to be effectively met, a strengthened purpose and recognition of AONB Management Plans will be required. Despite significant partnership effort, the condition of the natural capital stock (e.g. biodiversity declines, failing water quality, poor soil health leading to downstream flooding, lack of climate change adaptation and resilience) and a fragile rural economy are examples of factors impacting the ability to conserve and enhance in the AONB.

There is appetite and opportunity for AONB Partnerships to take on a more formal role in future rural support scheme delivery, as well as a lead role in delivering new ways of working based around a strategic landscape-based approach.

The government has supported excellent examples of rural development through the LEADER process and AONB Partnerships. There is merit in considering combining the strengths of these partnership models and through AONBs /NPs, enable a strategic network of nationally important landscapes that serve as enterprise zones for sustainable rural development - encouraging greater synergy between protected landscape management and rural growth programmes.

As we have referred to earlier in this response, AONB Partnerships provide an existing respected local framework for assisting in the delivery and management of the new Environmental Land Management Scheme (ELMS) in order to make best use of public money. In some cases, they will be able to add value to this through farm facilitation programmes or their successor scheme.

16. What views do you have on whether they work collectively at the moment, for instance to share goals, encourage interest and involvement by the public and other organisations?

Nothing of what we do is in isolation - all is through collaboration.

Of the 20 organisations represented on the East Devon AONB Partnership, 13 are non-public sector – this reflects the requirement for Local Action/LEADER groups and recognises the wide range of interest and organisational influence across AONBs. Large estates such as Clinton Devon Estates and the National Trust sit alongside civic amenity groups, representatives of the Federation of Small Businesses, National farmers Union and Country Landowners and Business Association. The Partnership is apolitical and all members recognise their role is to act as Ambassadors for the AONB.

These partners and our stakeholder engagement through a wider Ambassador network, annual meetings and public consultation (eg on Management Plan reviews) serve to encourage collaborative working and the development of shared goals.

17. What views do you have on their efforts to involve people from all parts of society, to encourage volunteering and improve health and well-being?

We completely align with the view that AONBs should be seen as health giving landscapes – healthy in themselves, healthy for wildlife, healthy for business and healthy for people. Our work has traditionally focussed on the former and is increasingly encompassing the latter, as the naturally healthy/natural capital public benefit movement dictates change.

We have been highly successful in engaging local communities in partnership with others through targeted, time limited, externally funded engagement projects. Like many, we suffer from a lack of continuity as funding runs out and we are tasked with exploring new approaches. We find ourselves

stretched in many different directions as increasing emphasis is placed on multiple outcomes and health-well-being is seen as an important new area to encompass.

We encourage volunteering opportunities and have had success in a number of areas including support to community led activity through our Sustainable Development Fund. But it's a crowded field with many opportunities locally and we would need additional resource to actively promote and extend this area of our engagement in a significant way.

Engagement with young people, through local associations such as Young Farmers and through schools and youth groups, is essential if the 25 year Environment Plan is to be delivered (as many of these young people will be directly involved in implementing it). Core funding currently limits our resources to facilitate wider engagement in these areas beyond our existing project funded areas.

18. What views do you have on the way they are funded and how this might change?

The present funding system isn't straightforward and may lead to uncertainty in the long term, particularly in implementing the 25 year Environmental Plan. AONB Partnerships receive much of their funding from DEFRA, along with contributions from local and county councils and other sources, whilst additional specific project funding and support is also obtained from other sources.

The current Defra funding agreement enters its final yr4 in 2019-20 and will be reviewed under the spending review and no doubt in part influenced by this review. Unlike the local authority funding, the Defra contribution is provided retrospectively.

This arrangement needs to change to provide greater stability and should be linked to increasing the statutory weight of the AONB Management Plans and any revised purposes of the AONB designation and/or role of the AONB Units.

Recommendation:

- Central government funding for AONBs is provided on a 5yr term in order to align with AONB Management Plan periods
- A minimum level of statutory local funding is a requirement of AONB core funding - which should be local authority but could also include other parties by agreement
- Consider how parish and town councils falling within AONBs might also form part of local authority funding (see Item 21.)
- Central government funding scheduling is in advance. Failing that it is provided in 2 stages through agreed annual business plans
 - Stage 1 - 90% in April
 - Stage 2 – 10% towards the end of the financial year
- Any additional roles or duties established as part of this review should be adequately resourced
- The NAAONB has a key role in reporting to government on the performance of AONBs to a nationally agreed protocol that is endorsed by all AONB Partnerships.

19. What views do you have on the process of designation - which means the way boundaries are defined and changed?

Natural England are the appropriate body to designate and amend AONB's although the process for designation or amendments to the boundaries appears heavily bureaucratic and time consuming. We would highlight, however, that staffing and resource levels at Natural England are stretched and this has an impact on the service they can provide.

There is certainly scope to review all AONB boundaries, to consider anomalies, areas within the AONB where the landscape has been eroded by development and other areas outside the AONB of high quality landscape value. This seems appropriate given in our case, East Devon was designated back in 1963 and has recognised issues with boundaries and abutting areas. Specific examples can be provided.

20. What views do you have on whether areas should be given new designations? For instance, the creation of new National Parks or AONBs, or new types of designations for marine areas, urban landscapes or those near built-up areas

The principle of creating new National Parks and AONBs and extending protection to other areas through new designations is supported. However, it is recognised this would likely be against a backdrop of limited change in central funding for designated landscapes and questions need to be answered about whether the benefit of new designations outweighs any potential cost associated with financial impacts on existing designated areas.

There is currently a proposal for creating a National Park incorporating the East Devon and Dorset AONBs that is lodged with Natural England. We are aware that East Devon District Council considers that the existing AONB status in East Devon combined with emerging Local Plan and operational planning functions of the Development Management service of the Council provide the best mechanisms to meet and serve the balanced and sustainable development needs of the whole of East Devon.

As a Partnership, for the reasons given above, we would have concerns about the wider impact on budgets across the designated landscape bodies as a result of such a designation. It is certainly the case that with more money and with more functions, (whether or not as a National Park), AONBs could do more things.

There is a strong view amongst some community members that a National Park designation would provide greater planning protection in East Devon. For all the reasons outlined in this response, this should not be the case, but it endorses a perception that AONBs are not seen by the public as being on the same footing as National Parks when it comes to planning. The media perpetuates this misconception largely because it doesn't 'get' AONBs and they don't fit into an easy sound bite. However, comparative evidence would quickly clarify if this was the case. As things are, even policy such as NPPF and other 'language' used by Government bodies and other parties in respect of AONBs and National Parks, does not help dispel that perception - but it could.

21. Are there lessons that might be learnt from the way designated landscapes work in other parts of the United Kingdom, or abroad?

We have already stated that clearly aligning the primary/first purpose of AONBs and National Parks would make it unequivocal that they are the same quality of landscape in law:

‘to conserve and enhance the natural beauty, wildlife and cultural heritage’

There seems merit perhaps also, in considering the above, to consider the purposes collectively across the UK and more particularly, the example of the Scottish National Parks (Scotland) Act with a desire to see a 21st century designated landscape for a fit and healthy nation and fit for purpose. These purposes are:

- To conserve and enhance the natural and cultural heritage of the area.

- To promote sustainable use of the natural resources of the area.
- To promote understanding and enjoyment (including enjoyment in the form of recreation) of the special qualities of the area by the public.
- To promote sustainable economic and social development of the area's communities

Having visited some of the Parc Naturel Régional in France we wonder how their 'commune' model of funding/support could be adapted to operate in AONBs through parish and town councils; possibly providing a third tier of funding around some minimum threshold alongside agreed levels of representation.

This could provide a clearer method of engagement with local community representatives and a more direct role in the delivery and management of AONBs that is not always present, despite some links already being in place for many AONBs.

Part 4 - Closing thoughts

22. Do you think the terms currently used are the right ones? Would you suggest an alternative title for AONBs, for instance and if so what?

It's true that the acronym often gets misquoted; even at the highest levels. But one should not change a name just because some folk misquote it. Whilst the 'AONB' term does not seem to receive full public recognition, and certainly much less so than National Parks, we would be reluctant to lose the message in the title that these are indeed outstandingly beautiful places. It's true that they are significantly NOT natural, but to many they appear natural and full of nature.

For that reason we feel the terminology remains appropriate and we would question whether there would be any merit in a name change.

Recommendation

Recognising the above earlier references to consider aligning AONB purposes with that of National Parks ALSO consider strap-lining them both as Nationally Important Landscapes.

23. The review has been asked to consider how designated landscapes work with other designations such as National Trails, Sites of Special Scientific Interest (SSSIs), Special Areas of Conservation (SACs), National Nature Reserves (NNRs) and Special Protected Areas (SPAs). Do you have any thoughts on how these relationships work and whether they could be improved?

The question is perhaps about who we work with to secure enhancements to these other areas. The answer is that in one way or another we have consistently worked with South West Coast Path/Natural England/RSPB/National Trust/Devon CC/East Devon DC, Environment Agency, Forestry Commission, Clinton Devon Estates and the many landowners responsible for SSSI/SAC/SPA/.

Aligning the purposes of AONBs with that of National Parks will serve to reinforce collaboration and subject to future delivery models, the resources to do more.

24. Do you have any other points you would like to make that are not covered above?

This review offers a once in a generation opportunity to recognise and reinforce the significance our designated landscapes play in modern society and to build on and enhance the positive work the National Parks, AONB Partnerships and their teams have delivered, in particular since the CROW Act, in these national assets.

We aspire to a report that provides the framework to ensure that these nationally important landscapes have the purposes, mechanisms and resources to be fit for our nation for the next 70 years. We encourage you to be ambitious and bold.