

# Consultation

## Response Document



43 Southgate Street, Winchester, Hampshire, SO23 9EH, UK  
Tel: +44 (0)1962 868 626 | [enquiries@cieem.net](mailto:enquiries@cieem.net) | [www.cieem.net](http://www.cieem.net)

### **Landscapes Review: National Parks and AONBs**

**Department for Environment, Food and Rural Affairs**

**18<sup>th</sup> December 2018**

# Introduction to CIEEM

The Chartered Institute of Ecology and Environmental Management (CIEEM), as the leading membership organisation supporting professional ecologists and environmental managers in the United Kingdom and Ireland, welcomes the opportunity to comment on this consultation.

CIEEM was established in 1991 and has over 5,000 members drawn from local authorities, government agencies, industry, environmental consultancy, teaching/research, and voluntary environmental organisations. The Chartered Institute has led the way in defining and raising the standards of ecological and environmental management practice with regard to biodiversity protection and enhancement. It promotes knowledge sharing through events and publications, skills development through its comprehensive training and development programme and best practice through the dissemination of technical guidance for the profession and related disciplines.

CIEEM is a member of:

- Environmental Policy Forum
- IUCN – The World Conservation Union
- Professional Associations Research Network
- Society for the Environment
- United Nations Decade on Biodiversity 2011-2020 Network

CIEEM welcomes the opportunity to participate in the review of England's National Parks and AONBs. We would be happy to provide any further information throughout the review process. For additional information please contact CIEEM Policy and Communications Manager, Jason Reeves at [JasonReeves@cieem.net](mailto:JasonReeves@cieem.net).

# Comments from CIEEM

---

National Parks and Areas of Outstanding Natural Beauty (AONBs) are a valuable asset to England and the designation of these areas marked a step change in attitudes towards our landscapes. We welcome the review of these designations, as it provides an opportunity to ensure they are meeting their intended purpose to enhance natural beauty, wildlife and cultural heritage, alongside promoting sustainable social and economic developments.

## 1. Biodiversity and Land Management

- 1.1 We believe protected areas, including designated landscapes, form the fundamental component of our ecological network and have served as one of the key mechanisms for safeguarding environmental assets for many decades. However, as has been reported in the influential *'Making Space for Nature'* report, the ecological networks needed to support functional protected areas are at present, inadequate. Protected areas need to be *"more, bigger, better and joined"*. To achieve this, the government needs to deliver on its commitment to create a Nature Recovery Network, with protected sites, for example: Sites of Special Scientific Interest, and designated landscapes, such as National Parks and AONBs, at its heart.
- 1.2 As a result of pressure from developments, agricultural practices and commercial forestry<sup>7.2</sup> designated landscapes are not delivering for biodiversity as they should. This is evident as the condition of only a quarter of SSSIs by area inside National Parks are in favourable condition, while 38.5% of SSSIs by area in England are in favourable condition<sup>1</sup>. Condition of habitats within existing National Parks and AONBs must be improved with a robust regulatory baseline, ambitious targets and a strong monitoring programme to measure recovery of habitats and key species.
- 1.3 Biodiversity conservation in National Parks and AONBs also has a relatively low priority in perception and in actuality. In National Parks, biodiversity should be made a higher priority to keep in line with the Sandford Principle, which states nature conservation should have primacy when there are irreconcilable conflicts with other purposes and duties<sup>2</sup>. As AONBs have great potential to form part of the Nature Recovery Network, we believe the Sandford Principle should also apply to them.
- 1.4 Biodiversity in these designated areas can be enhanced by delivering recovery schemes at a local level. There is considerable potential for National Parks and AONBs to develop as a delivery agency for the proposed Environmental Land Management (ELM) payments, and to become an integral part of the payment for public goods scheme. The public goods scheme can be used to ease pressure from agricultural practices within and surrounding designated areas and provide opportunity for Authorities to work in partnership with landowners. Targeted delivery should be part of the 'local menu' aspect of the ELM and improved integration with the Natural Character Area systems can be implemented where they overlap with the protected area boundaries.

---

<sup>1</sup> Campaign for National Parks (2018) Raising the bar: improving nature in our national parks, Campaign for National Parks, London.

<sup>2</sup><http://www.nationalparks.gov.uk/students/whatisanationalpark/aimsandpurposesofnationalparks/sandfordprinciple>.

- 1.5 Local initiatives and landscape-scale conservation projects have worked well in designated areas to improve biodiversity and should be encouraged and scaled-up.
- 1.6 There are potential tensions in nature conservation between the natural geography of the landscapes and the human geography of the LA's boundaries – local initiatives addressing ecological networks try to address this. There is a need for strategic recovery of ecological networks at a national scale from National Parks and AONBs.
- 1.7 Land management of the designated area should be implemented using clear management plans, with the delivery supported by public bodies. Plans should identify areas for improving connectivity of habitats and include specific targets for improving their condition. Management plans can be used for strategic direction of the 'local menu', as referenced in paragraph 1.4.
- 1.8 National Parks and AONBs play an important role in providing opportunities for access and recreation and provide good examples of constructive links with volunteering groups. This should be encouraged to improve quality of life and health; however, high numbers of visitors can negatively affect ecosystems and should be managed at the local level.
- 1.9 National Parks have a socio-economic duty to foster the economic and social wellbeing of local communities within their protected landscapes. Many residents and businesses in AONBs have little or no awareness or knowledge of the AONB. Enhancing local initiatives and raising the profile of designated landscapes and their purpose will improve this.

## **2. Status and Designation**

- 2.1 There are very few differences between National Parks and AONBs in practice, however, National Parks have an additional purpose to promote wildlife, recreation and cultural heritage. We would like greater alignment of the purpose of AONBs with that of National Parks, to recognise the contribution to these areas that many AONBs already offer. AONBs and National Parks should also receive equal protection in law.
- 2.2 All National Parks and AONBs are currently IUCN Category 5 protected areas. A simpler designation system for all protected areas in the UK would be beneficial to improve recognition, appreciation, engagement and understanding amongst the wider public.
- 2.3 The process for designated landscapes is currently lengthy and complex, leading to slow progress with boundary reviews. A review of the process is needed to ensure evidence for whether a site should be designated is clear and simple.

## **3. Planning Decisions**

- 3.1 At present, AONBs do not have the plan-making functions awarded to National Parks. This has resulted in AONBs not being adequately considered by Local Planning Authorities, which should be addressed in this review. AONBs should be fully considered in plan-making by making them full statutory consultees. This would improve clarity and consistency for planning decisions and recognise the equal importance that AONBs and National Parks have.

#### **4. Governance and Resourcing**

- 4.1 Under the current system, National Parks and AONBs operate as two ‘families’, with two separate associations and in two separate silos. This review provides an opportunity to build an improved system that avoids duplication and builds collaboration and trust. The alignment of National Parks’ and AONBs’ purpose, as mentioned in paragraph 2.1, would also help to reconcile this separation.
- 4.2 The current funding model, whereby National Parks are fully funded by Defra and AONBs are partly funded by Local Authorities, is fragile. AONBs would benefit from greater security and independence through a similar funding model to National Parks.
- 4.3 National Parks and AONBs have faced challenges from a lack of resources in fulfilling their functions. The designated landscapes will need strengthening of resources, including both finances and relevant skill-sets, to deliver the above changes. Similarly, governance arrangements should have a greater role for national appointees appointed on the basis of their skills and experience to ensure designated landscapes are governed in the national interest, as well as being locally focussed. National Park Services in Canada and New Zealand, in particular, recognise the collective value of their protected landscapes at a national level and operate management structures and centres of expertise at a national level. These offer significant potential to draw lessons.