

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

Member of public

Organisation

2. If you are replying as a member of the public

What is your name?

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.

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

Which organisation(s)?

Historic England

What is your name and position?

Sarah Tunnicliffe, Senior National Rural and Landscape Adviser

What is your email address?

sarah.tunnicliffe@historicengland.org.uk

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.

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)An answer is required

- Yes, I am content for you to use extracts of my response in the final report
- No, you may not use extracts from 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?

[More Information](#)

(Required)An answer is required Yes No

If you have answered yes, please give your reason

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

Before anything else, 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.

Upload

- Yes, you can use my photo online or in the report No, you may not publish my photo

[Upload Heritage Archive pic of NP and AONB]

Part 1 - Opening thoughts

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

7. What do you think works overall about the present system of National Parks and AONBs in England? Add any points that apply specifically to only National Parks or AONBs

Please write your answer here

England's National Parks and Areas of Outstanding Natural Beauty together represent and incorporate key aspects of our cultural heritage. Although covering just 10% of England, they contain a quarter of the national total of Scheduled archaeological sites, more than 65,000 listed buildings, over 360 registered parks and gardens, and 11 registered battlefields, making them rich in the story of our history. The importance of the cultural heritage of these precious landscapes has recently been reaffirmed in the National Planning Policy Framework, and celebrated in the National Parks England publication 'Our Historic Environment: special landscapes shaped by people', and previously within English Heritage's (now Historic England) publications 'Landscape Legacy' and 'Outstanding Beauty, Outstanding Heritage'. These documents also celebrate the successes which have been achieved through partnership working.

The traditional buildings, archaeological sites, field boundaries and even the traditional land management practices often associated with these areas are a fundamental part of their character, distinctiveness and their special qualities. It is important that the cultural dimension which underpins our protected landscapes continues to be recognised as fundamental to their designation and management. The role of cultural heritage in sustaining these special places was recognised with the Eight Point Plan for England's National Parks, and the National Planning Policy Framework.

Given the particular correlation between designated heritage and protected landscapes, we would like to see all National Parks and AONBs continue their valuable work in helping to reduce the number of designated sites on the Heritage at Risk Register, progress against which is a Government Key Performance Indicator. At the launch of Heritage at Risk in 2009, 23% of Scheduled Monuments nationally were at risk, whereas the figure for National Parks was 20% and for AONBs 24%. The 2017 report of the Monitoring Environmental Outcomes in Protected Landscapes (a project co-ordinated by Natural England to provide an annual set of datasets to help provide trend data and monitor change in National Parks and AONBs) illustrated that the proportion of Scheduled Monuments 'at risk' had been reduced by 5% points since 2011, whereas nationally it had only reduced by 3% points during the same period. This finding demonstrates the importance and the results of the collaboration that all National Park Authorities and many AONB partnerships undertake with owners to sustain the special heritage qualities of their areas, often as part of their Management Plans. Including Heritage at Risk reporting as a feature of all future National Parks and AONB Management Plans would help to ensure a more consistent approach is achieved across all of these areas in England.

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

Please write your answer here

Currently there are different approaches within National Parks and AONBs to the recognition of the importance of cultural heritage. Historic England would welcome a move to see the definition of natural beauty clearly defined for all protected landscapes on the same basis which stresses the importance of the cultural heritage as of intrinsic importance within these landscapes. We would welcome the formal adjustment to the AONB statutory purposes to specifically include 'wildlife and cultural heritage'. We feel that this would also better reflect the parity of approach currently seen in the NPPF.

Management Plans provide a vehicle for parties concerned with the management of the protected areas to come together with a common purpose. The way in which they ensure integration of outcomes is a particular strength. Given their importance in identifying and helping to drive progress against objectives which sustain the special qualities of an area, we would nonetheless welcome a review of the use and weight afforded to them. We feel that it would be particularly helpful to consider making it a requirement to prepare, to refer to them and to use them in the context of the planning system. This applies especially to relevant authorities in relation to AONBs. We would also like a requirement for management plan preparation to incorporate an assessment of Historic England's new historic landscape character data, to ensure that they reflect the cultural as well as natural landscape features. Along with this we would welcome the introduction of explicit targets for cultural heritage within AONB Management Plans. Furthermore, it would be helpful to introduce provisions requiring that Local Plans should reflect AONB Management Plans in their formation and review. This would help to ensure consistency in the approach taken across these administrative tools, and better support the delivery of the relevant statutory duties. It would help to ensure that, in exercising or performing functions within these landscapes, relevant authorities would have regard to their statutory purposes.

Part 2 - Views

We'd like to hear views on particular issues.

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

Please write your answer here

The European Landscape Convention of the Council of Europe recognises that in terms of landscape, culture and nature are indivisible. We therefore feel that the conservation and management of nature and biodiversity in our protected landscapes do not need to be treated separately to that of cultural heritage and the historic environment. At a landscape level integrated, multi-objective management is more cost-effective and efficient. It is also consistent with and reflects the aspirations of the 25 Year Environment Plan. In broad policy terms, we would therefore wish to see the National Parks and AONBs given a role in the future which recognises cultural heritage alongside nature and biodiversity. Specifically, we would like to see the formal adjustment to the AONB

statutory purposes to explicitly include 'wildlife and cultural heritage'. This would help to align and achieve better consistency between the purposes of National Parks and AONBs.

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

Yes, where this takes appropriate consideration and management of the historic environment within these areas.

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

Please write your answer here

National Parks and AONBs are cultural landscapes, shaped by human activity over thousands of years. These living, working landscapes have, in turn, influenced local and national identity, inspiring writers, poets and artists and contributing significantly to the nation's rich cultural legacy. We believe that National Parks and AONBs should continue to have a role in managing landscapes, their special qualities and protecting the cultural heritage for future generations. In order to achieve this both National Parks and AONBs need to be adequately resourced.

The importance of National Parks as cultural landscapes is mentioned in the 25 Year Environment Plan. We would, however, like to see cultural heritage better integrated into the vision and aspirations for both National Parks and AONBs.

Heritage is specifically referenced in the 2016 National Parks 8-point plan ("we will enhance people's involvement in the interpretation of the historic environment and natural beauty in National Parks, support the Lake District's bid for UNESCO World Heritage Status and tell the story of cultural landscapes in England's National Parks").

Historic England will continue to work with the protected landscapes family to conserve cultural heritage and to see its potential realised. Historic England has had Joint Statements for the historic environment with the umbrella bodies representing National Parks and AONBs for over two decades. The National Parks Joint Statement helps to foster closer working and collaboration on projects, research and publications etc. which celebrate and support the value and conservation of the historic environment within these areas. This has gone far beyond simply facilitating the delivery of the Government's Heritage at Risk KPI.

The AONB Accord has similarly helped to foster a closer working relationship and cross-working on projects, research publications etc.

Notwithstanding the value and successes of the Joint Statement and of the Accord, as we said in relation to question 9 (above) we would like to see greater parity in the future in the role of National Parks and AONBs in protecting and managing cultural heritage. To this end, we would welcome the formal adjustment to the AONB statutory purposes to specifically include '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?

Please write your answer here

Cultural heritage needs to be cared for, not only for its own sake but also because it is an important asset for protected landscapes, helping to deliver economic advantage by encouraging inward investment and stimulating tourism. Some 60% of domestic visitors and 63% of international visitors to the Lake District rated the area's sense of history and tradition as an extremely or very important factor in their decision to visit. But heritage – and investment in its conservation, does not just sustain landscape character and tourism. In 2006 English Heritage (now Historic England), Defra and the Lake District and Yorkshire Dales National Park Authorities commissioned socio-economic research to assess the impact of agri-environment funding on the restoration of traditional buildings and field walls in these areas. Historic England commissioned an update of this work in 2018 which showed that:

- It can be estimated that total income effects of repairing farm buildings would have ranged between £18.8m and £29.0m from an initial investment of £9.39m, with between 29.6 and 36.7 FTE jobs being created in the local economy of the Lake District ESA.
- Similarly, it can be estimated that all farm buildings schemes in the Yorkshire Dales National Park would have generated somewhere between £7.7m and £8.5m (from an initial investment of £4.87m) and between 19.2 and 19.7 FTE jobs for the economy of YDNP area, with walling schemes generating further impacts somewhere in a range between £5.0m and £7.8m for the local economy, corresponding to between 19.2 and 19.9 FTE jobs.

Because of the success of National Park involvement within previous grant schemes and the positive economic impact of investment on the wider communities within them, we are currently collaborating with Natural England, the Rural Payment Agency, Defra and five National Parks to pilot a Countryside Stewardship farm building restoration project. The pilot recognises the particular contribution to the character of these places made by traditional farm buildings. Demand for the scheme has been high and the pilot, along with previous work, is helping to target funding to buildings which are an integral part of the character of these areas.

Historic England recognises the need to ensure that farmers are better rewarded in the future for the public goods that they provide, and cultural heritage is a key one of them. In the future AONBs, like National Parks, could provide a mechanism to help deliver future environmental land management schemes.

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

Please write your answer here

Each year National Parks and AONBs attract 246 million visitors. National Parks and AONBs are integral in helping to deliver and manage access and recreation – but it is important that access (or rather the physical impacts of access and of access infrastructure) does not prejudice other

environmental considerations (such as the condition of cultural and natural heritage, or the wider landscape).

At a time of increasing financial pressure National Parks have worked to maintain 85% of the overall condition of rights of as 'easy to use' since 2011. In one specific case Northumberland National Park Authority also stepped in to help rescue the management of the Hadrian's Wall Path National Trail when previous mechanisms failed. The staff of Northumberland National Park Authority used their skills and expertise to ensure that the trail's contribution to tourism and local economies was sustained, in addition to preventing adverse environmental impacts upon the World Heritage Site, Scheduled Monuments and SSSIs along its course.

To date Natural England has provided support in a partnership project (Monitoring Environmental Outcomes in Protected Landscapes) to collect and report on metrics for National Parks and AONBs on access and other trend data. We would welcome Natural England continuing to deliver this role which helps support National Parks and AONBs in reporting against the access indicators within the 25 Year Environment Plan.

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

Please write your answer here

National Parks and AONBs help to support communities within their areas as well as those beyond their boundaries. As shown in earlier question responses, the areas work hard to deliver in partnership projects which help protect and manage the landscape, provide jobs to communities, and help to reinforce the sense of place of the areas. Protected landscapes work to secure additional funding and resources to deliver outcomes in their areas and beyond.

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

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

Please write your answer here

A major difference exists between National Park Authorities (NPAs) and AONB partnerships in that NPAs are statutory planning authorities, whereas for AONBs this duty lies with the relevant local authorities. We would therefore welcome consideration in the Review to AONB partnerships being given statutory consultee status for planning matters.

The new National Planning Policy Framework (NPPF) reinstates the references from the 2012 NPPF to AONBs in terms of having the 'highest status of protection', and also retains the references to the

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conservation of wildlife and cultural heritage being important in these areas which is to be welcomed. The new NPPF document also includes 'enhancement', and we would welcome and encourage further exploration of how enhancement might be pursued, and what it looks like in relation to the historic environment. Furthermore the new NPPF also adds a definition of 'major development' for the purposes of AONB and National Park policy (see footnote 55). Historic England would welcome further clarification on this.

Historic England would like to see amendments to the Planning Practice Guidance which clarify a number of National Park and AONB issues. These include the need for a definition of major development, as mentioned above, as well as an updated interpretation of the core purposes of National Parks and AONBs (including a clarification of the term cultural heritage within natural beauty), which could provide a common understanding of the way in which the purposes should be applied to these contemporary issues, and set expectations for building them into decision making.

On tackling employment and housing in particular, the exclusion of National Park and AONBs from the entry level exception sites policy is to be welcomed. However, this doesn't remove all the threats to National Parks and AONBs from major development.

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?

Please write your answer here

See our response to question 14, above. AONBs only have limited tools available to influence local planning decisions. In our view, this considerably weakens their ability to fulfil their statutory purposes in comparison to National Parks. We would therefore welcome a focus on how AONB governance might be improved and strengthened to increase their influence and their independence. We would also suggest that one simple way in which this might be achieved is to give AONB partnerships statutory consultee status in planning matters.

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?

Please write your answer here

As we said in relation to question 10 (above), Historic England has been working in close partnership with National Parks and AONBs for a number of years, both informally and formally through our Joint Statements and our Accord. Historic England has a positive working relationship with both the National Association for AONBs and National Parks England. We would welcome further collaboration, and suggest, however, that a particularly fruitful area for future work might be in relation to greater co-working across the protected landscapes family (specifically between AONBs and National Parks).

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?

Please write your answer here

National Parks and AONBs annually welcome 246 million visitors; therefore the opportunities for them to encourage volunteering and improve health and well-being are considerable. In this respect it is important to note that protected landscapes provide a sense of place not just to their inhabitants and communities, but also to visitors, and that access to these places (rather than just to nature) can promote cohesion and wellbeing.

Volunteers are active in a number of schemes already in protected landscapes. For example, in the Yorkshire Dales and Exmoor National Parks they have used volunteers to undertake the survey work of Heritage at Risk assets, thereby providing an opportunity to become involved in an area of the Authority's work. We would encourage the use of volunteers in other National Parks and AONBs to help inform the protection of the cultural heritage.

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

Please write your answer here

Anecdotally, to us the governance and funding model applied to the management of AONBs makes them (in comparison to National Parks) much more precarious. This in turn impacts upon the scope and extent of outcomes that they are able to deliver.

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

Please write your answer here

We would like to ensure that Historic England is appropriately consulted on the designation of future areas and on boundary reviews.

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.

Please write your answer here

No response

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

Please write your answer here

No response

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?

Please write your answer here

No response

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?

Please write your answer here

We'd make the point that many of the designations referenced above are European in origin, while (with the exception of World Heritage Sites) those relating to cultural heritage are entirely domestic in nature, though often of national importance. In the past European designations have often been accorded greater weight, but our exit from the EU affords an opportunity to rebalance priorities. This does not mean that we should reduce protection for anything, merely that we can move towards a more integrated approach to managing our landscapes that is both more efficient and reflective of our domestic needs.

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

Please write your answer here

No response