

## **Evidence from Shropshire Hills AONB Partnership to Glover Review of designated landscapes - as submitted 14<sup>th</sup> December 2018**

### **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.**

- The designations give recognition to these nationally important landscapes, as well as some protection. Designating and managing these areas brings huge value to society, including improving people's wellbeing, enhancing the economy, and supporting environmental services.
- Designated landscape organisations take an integrated, sustainable development approach, work with local communities, and acknowledge the designated areas as living and working landscapes. Through both staff and volunteers, there is a huge wealth of knowledge in the organisations of the areas.
- AONB Partnerships are effective conveners of a wide variety of people and interests, and by working in partnership their small teams achieve a lot with relatively few resources. We are sometimes described by others as 'honest brokers' and help bring other parties together to co-ordinate and reduce potential conflict. While AONB organisations have no real 'teeth' or powers, the strength of our partner engagement has been described as an influential form of 'soft power'. Excellent examples of this are our work on rivers, upland commons and sustainable tourism, and our recent Landscape Partnership Scheme.
- The AONB 'model' of a representative Partnership group along with a strategic Plan and a supporting team, works well and is a great example of delivery by local partnerships, as described in the 25 Year Environment Plan. The AONB Partnership and the Management Plan have some status to give them credibility (though not enough), and both partners and the team know the area well. The AONB structure bridges effectively from grassroots to policy levels.

### **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.**

AONBs are and have always been the poor relation in this family. There is a large gap between the high aspirations of the AONB designation and policies, and the actual influence carried by the designation and organisations in reality. AONB structures have many strengths and so we would hesitate to call them 'not fit for purpose', but the status and capacity of AONB organisations is not adequate to meet the large and necessary tasks set out for the designation. This applies across all areas of activity, but is especially seen in relation to planning decision-making. We are achieving much with the resources we have, but aspects of our landscapes and wildlife are still in decline.

**AONB PURPOSES.** The single purpose of AONB designation is insufficient to do justice to the broad value of AONBs, and the term 'natural beauty' encourages a narrow view of just what the landscape looks like, and a tendency for other many benefits such as ecosystem services to be overlooked. AONB purposes should be amended to be the same as for National Parks. This would mean accompanying 'natural beauty' with 'wildlife and cultural heritage', as well as a new statutory purpose for enjoyment and understanding.

**AONB GOVERNANCE AND RESOURCING.** The system of local authority hosting of AONB Partnership teams has been stretched almost to breaking point by increased pressure on councils' funding. A relatively 'hands-off' approach by Defra has allowed greater flexibility, but in combination this has created the potential for that flexibility to be exploited by hard-pressed local authorities to the detriment of the AONB. Loss of core Defra and council funding has led to an increasing amount of AONB core staff time going on earning income, and uncertainty over hosting has led to time being spent on exploring alternative structures, both with inevitable opportunity costs. The increased need for AONB teams to justify their own existence and activity has also inhibited their engagement and promotion of the activities of other partner organisations in support of AONB purposes. In 2017 our Partnership and councils made a formal bid for a Conservation Board for the Shropshire Hills AONB, which was shelved by Defra due to the announcement of this national review. We still aspire to a stronger and more secure structure for our AONB, either through this mechanism or perhaps some alternative mechanism if one is found or created.

**AONB STATUS AND PLANNING.** AONBs are not given adequate weight in planning – the policy words are strong, but the reality of decisions does not bear this out. AONB organisations should become statutory consultees in planning. If legally or in practice this requires stronger organisations to be put in place, this should happen, as it would also bring greater stability, stronger governance and higher profile, which are all needed. We also seek a new mechanism for AONB organisations to become statutory partners in planning policy making. The Section 85 duty for public bodies to have regard to AONB purposes is weak and should be strengthened to 'having due regard' to the purposes of the designation. Strengthening the local authorities' duty for the AONB Management Plan to include responsibilities for implementing as well as reviewing the Plan should also be looked at. It is not clear whether this is practical legally or how it would change the nature of AONB Management Plans which local authorities would be happy to approve.

**AONB PROFILE.** The Area of Outstanding Natural Beauty title and its acronym are clumsy and too often used wrongly. A new simpler title is needed.

**THE TWO-TIER SYSTEM.** If a two-tier system of landscape designations is to be retained, the rationale behind the distinction needs to be clearer than at present and justifiable in the modern context. The National Parks may not need this, as their status is well understood. But for us in the second tier, explaining what we are (as we frequently and must do), the difference compared to a National Park is part of the definition. AONBs are also a national designation and deemed to have equal landscape value and protection, and the designation criterion about potential for open-air recreation would apply to many AONBs and seems out-dated and inadequate. Size is a factor, but a good number of AONBs are 'extensive tracts of land' and larger than some National Parks. Without weakening the status of National Parks, we call for some convergence between the two tiers, and a better distinction than just being 'especially' desirable to designate an area as National Park.

Most of these key points of our response are elaborated in answers to later questions.

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

The Shropshire Hills AONB is very important for biodiversity, with 92 Sites of Special Scientific Interest and one large Special Area of Conservation. Nature conservation and biodiversity are important roles for the AONB Partnership, and not always acknowledged by some who see the designation being about 'beauty' and fail to understand the depth contained within 'natural beauty'. Evidence suggests that despite a lot of conservation activity, much biodiversity in

AONBs and National Parks is in decline, and this is true in our area. Improvements resulting from much conservation activity, e.g. on SSSIs and through agri-environment schemes, are accompanied by some declines in biodiversity and failure to make meaningful progress with certain water quality and catchment management issues. 0% of our river SSSIs are in favourable or recovering condition.

Small AONB teams cannot have the necessary expertise in all areas, but we do have the ability to choose what we work on and try to complement the activity of other organisations. In our AONB this is especially the case with regard to rivers and catchment work in the River Clun catchment, though we have also worked, or are working, on woodlands, meadows, wetlands and common land. The retention of specialist, experienced staff has enabled us to become a key biodiversity deliverer and adviser in certain areas.

Nature conservation is very important to the continued international recognition of AONBs as IUCN Category V protected areas, and the natural environment is obviously a large driver for Defra.

We have adapted the former Sustainable Development Fund, which used to operate in all AONBs and National Parks, into a Conservation Fund, which is now funded only by charitable donations. It is more closely linked to our primary purpose, and supports a range of good conservation projects mainly run by community groups.

The historic institutional split in the UK between landscape and nature conservation (and also heritage) has not been helpful and its legacy remains. As organisations which try to connect these activities, along with tourism, the economy and community etc. AONBs and National Parks are distinctive. This holistic approach is valuable, and while these questions understandably break issues down into topics, we would encourage the Review to see the value of our efforts to integrate these topics at a local level.

**CONCLUSION: Nature conservation and biodiversity are key roles for designated landscapes.**

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

The need exists to do more for biodiversity, and more can and should be done if our capacity can be increased. However, much potential project funding is competitive and is now reduced with the end of EU funding and certain Landfill tax sources. Heritage Lottery Fund money can be difficult to direct towards biodiversity work and is becoming increasingly competitive. In the past, agri-environment schemes have been by far the biggest delivery mechanism for conservation in our AONB, compared to other projects. The government new Environmental Land Management Scheme will continue to be the most important mechanism, and AONB teams should play a greater role within these.

The concept of 'landscape scale' nature conservation fits well with the remit and way of working in AONBs, which have much to offer in this field. In particular, we are more used to working in collaboration with farmers and land managers than some conservation organisations who mostly manage their own sites. We have successfully assisted such organisations with communications and engagement where we have strengths. Partnership working on biodiversity with other organisations will remain very important – for us this includes statutory bodies such as Natural England and Environment Agency, as well as voluntary sector bodies including the National Trust, Wildlife Trusts and Butterfly Conservation. We would like to do more of this if we had greater capacity. We have activities with partners defined and waiting for capacity to implement - on woodlands and trees, on meadows and road verges and on uplands and commons.

**CONCLUSION: We bring strengths of landscape-scale working and facilitation to nature conservation and biodiversity, but we must do more.**

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

Landscape and beauty would be seen as the heart of the AONB remit, though people's interpretation of these terms varies. The landscape of our AONB, as others, is being eroded by inappropriate developments, which the designation does not appear to have the influence in planning to prevent. Sometimes these undermine considerable amounts of positive project work, often funded by the public purse. The quality of the landscape is dependent on many decisions and choices by many people, especially land managers. Though the landscape is highly valued, to a large extent it is just a by-product of farming decisions. It is too important to be a by-product and needs to be factored more into financial incentives for land managers.

The designated landscapes enshrine 'beauty' into legislation in a very unusual way. This can bring some issues of perception, but alongside scientific approaches, beauty is something which resonates with the way in which ordinary people relate to the landscape. It is a way of continuing to value more intangible but hugely important aspects of the landscape, and is definitely of value.

AONBs try to integrate conservation of cultural heritage with the natural environment in a way that few other organisations do. We, like others, have had Landscape Partnership Schemes funded by the Heritage Lottery Fund. These have included considerable work on heritage (including both sites and skills, etc.), and we enjoy good working relationships with Historic England. The fact that our sponsor department is Defra while heritage comes under DCMS does mean that heritage does not come through as a driver from Defra, and greater integration on this would be preferable. We welcome that the Review is reporting to government and not just to Defra, and urge the Review to make connections and recommendations to other relevant departments.

**CONCLUSION: Landscape is a vital integrating concept, while beauty and cultural heritage help to balance our remit, and draw in wider support.**

**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?**

The Shropshire Hills is a farming area, and working with farmers is a longstanding high priority for us, though one on which we are continually working to do more. Changes in farming are one of the key influences on our landscape, especially in the uplands, and we see continuation of sustainable and nature-friendly farming as vitally important for the AONB. Succession and keeping young people in upland farming is a real issue, and the business choices farmers make have big implications for the AONB landscape. Some of the issues go beyond farming to the broader food industry, and the general desire for cheap food drives harm to our landscapes which many people are unaware of.

We have representation on the Partnership and its linked groups from farmers and farming organisations, but would welcome greater involvement. We have previously run a Farming Project funded by LEADER and we are currently involved with a national project on upland commons and a river catchment project offering grants and advice to farmers. We have undertaken a number of processes of farmer engagement including on a fee-earning basis for other organisations and partner projects, as this is recognised as a strength of our team. We

have organised and supported Farmers' Den advice clinics and events, and farmer-led groups including the Stewardship Facilitation Fund.

In the course of commenting on planning applications from the point of view of our statutory purpose to conserve and enhance natural beauty, we sometimes have to object to applications by farmers, such as large scale intensive livestock buildings and industrial scale renewable energy operations. Though the AONB Partnership's position is often not the determining factor in a planning decision, this consultation role can affect our relationships, and the perceptions of some farmers of the AONB designation appears to be that it limits their options. We would argue that if approached in the right way, the high quality of environment in the AONB provides an asset which can benefit the land management economy rather than being a constraint. Some farmers are positive about the support and services we can offer them, and the opportunities which arise from farming in an area of high landscape quality.

The proposed new environmental land management schemes offer potential for a greater role for the AONB Management Plan, Partnership and team. We are comfortable with taking a strong role in helping to define the priorities of such schemes for the area, and of facilitating and encouraging their uptake. The Shropshire Hills AONB Partnership is however very wary of taking on contractual roles for schemes such as issuing agreements, making payments, monitoring and enforcement, as we feel there is great potential in these for harming our relatively good relations with farmers which arise from supporting and advisory roles.

**CONCLUSION: Working with farmers and land managers is of vital importance to us and probably all designated landscapes.**

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

The fact that the AONB Conservation Boards have a purpose for enjoyment and understanding shows that this is applicable to AONBs, but it is a legal anomaly, and this purpose should be there for all AONBs.

In our AONB, the day-to-day responsibility for managing rights of way and access rests with the local authorities. Unlike some AONB teams, we do not manage any public sites. The AONB Partnership's role in this field is more strategic, e.g. through leading a forum and strategy for sustainable tourism, and working in partnership to address issues such as pressure on honeypot sites and promotional activity to encourage dispersal. We take an active role with recreation and tourism as these are important to our area, and it would be preferable for this to be recognised in AONB purposes, as mentioned above.

There is much more which could be done to promote exercise and wellbeing through the landscape, and also reaching out to communities less well represented among AONB visitors, including urban areas. Our area is sparsely populated but relatively near to centres of population such as the Telford and the Birmingham conurbation. Sometimes this work is better done by other partners, for example these are high priorities for the Shropshire Great Outdoors Strategy Board and Shropshire Council who run Health Walks and active volunteering programmes.

In Shropshire as elsewhere there is a push for greater recognition and use of greenspace close to where people live, but high quality landscapes also play an important and complementary role. They may be visited less often, but areas such as AONBs and National Parks offer a high quality experience and different opportunities for inspiration.

**CONCLUSION:** In collaboration with our partners, doing more for access and recreation is a key way in which the landscape can deliver benefits directly to the public through health and wellbeing.

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

The landscape provides a great place for people to live and work, and conserving it is good for both residents and visitors. We encounter many people who are proud to live and work within an AONB and who support its aims. There are some who are negative about it, and a good number who are unaware of the designation and organisation, though they may well appreciate the landscape itself. We do offer support and services to people, community groups, etc. which may not be available outside the AONB. We feel that some people have a perception of the designation as a restrictive thing which is not borne out by the reality.

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

We are mindful that the wording of this question is probably informed by the National Parks' duty to 'seek to foster the economic and social wellbeing', which is different to AONBs. We endeavour to support people who live and work in the area, but we have the single statutory purpose to conserve and enhance natural beauty, and must relate all our activity to that. Where we can support local people to help meet this purpose, we will do it. We employ a full time Community Officer and do a lot of work with community groups. Over the five years to 2017, the AONB Partnership:

- supported over 150 projects and many businesses with grants and advice
- led around 270 events with more than 7,500 attendances.
- led over 100 sessions with 33 different schools, with over 3,500 attendances and 224 John Muir Awards achieved.

We receive appreciation from many of the community groups we work with, such as this recent example "At our meeting yesterday the directors expressed enthusiastic and unanimous support for the Shropshire Hills AONB... From the point of view of our small organization concerned with conservation of the local landscape, the AONB has laudable aims but does appear to be limited in its achievement of them by how limited its power is and by how restricted its resources are."

With the Shropshire Hills AONB Trust, a charity which we helped to set up in 2016, we distribute small grants to community groups. There is both potential and demand to expand all of this activity with additional resources.

We have given a high priority to working with businesses in our area, and used to run a Sustainable Business Network. We are keen to help businesses to work with the special qualities of the AONB rather than against them. Words such as 'supporting local businesses' occasionally however get thrown back at us to try to justify activities which may be harmful to the AONB. We cannot guarantee to support businesses whatever they want to do. We must be guided by our primary statutory purpose and we try to work with businesses to further this.

**CONCLUSION:** Working with our local communities is at the heart of the UK designated landscape approach, and is both a strength and a future priority.

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

The pressures for new housing are not as significant in our AONB as in some, though they are real. We would see our role as helping local authorities to deliver housing targets in a sustainable way. In some cases (a minority of housing applications) this may mean objecting, or perhaps seeking higher design standards or influencing the size and scale of developments. In our deeply rural area with an ageing population there are issues of demographic imbalance and rural villages losing services. We have been supportive of 'Rural Rebalance' options for housing distribution from our main local authority, recognising that some development must take place in villages in order to retain vibrant communities. There is however a problem with housing provision following the market rather than local housing need, to the detriment of our communities, and we are not able as an organisation to exert much influence on this. National Park authorities clearly play a much greater role on this topic. There is interest among the Partnership in the mechanisms available to a National Park authority, but a range of views on this.

We have relatively little influence on transport. The trunk road through the middle of our AONB has been identified as the main single negative impact on tranquillity, which is a highly valued quality of the AONB. Smaller rural roads are suffering from larger and larger vehicles, causing physical damage and increase in soil loss to rivers. Public transport provision is very limited across much of the AONB, but we operate a Shropshire Hills Shuttles bus service on weekends through the summer, which is highly valued. There is potential for us to do more with the Heart of Wales railway line.

We would wish to develop better guidance on design for both housing and roads, as have proved useful in other areas, but have so far been prevented by capacity reasons from doing this.

Other things such as large agricultural developments and renewable energy installations are probably more significant for us as planning issues. The overall concern is that the AONB designation is not being given adequate weight. Worryingly, every single known case of proposed 'major development' in our AONB since 2012 (11 cases) has been recommended by planning officers for approval. Not all of these developments have eventually gone ahead, but large poultry units, solar farms and large housing developments have all been contentious.

Some developments also drive wider land use changes beyond the planning system. The large number of relatively minor development applications in the AONB are cumulatively affecting its character. We urge the Review to consider fully the issues of planning in AONBs and how the influence of the designation can be improved.

Church Stretton as the main market town within the AONB illustrates an issue we face with housing, in that the housing numbers allocated do not seem possible to accommodate within the town without environmental harm. The physical space for development is significantly constrained by the very landscape which makes the town's setting so valuable, with a combination of floodplains and highly visible hillside sites and very little else left available between. The allocation of housing numbers has not taken adequate account of this, and continues to drive development proposals which are unsustainable.

We believe also that the threshold of housing numbers required in a development to generate Community Infrastructure Levy (CIL) is creating a financial incentive towards larger scale developments which is not in keeping with the AONB.

**CONCLUSION: Influence in planning (more broadly than just housing and transport) is one of the main weaknesses in the AONB system and urgently needs new stronger mechanisms.**

**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?**

As described above, the Joint Advisory Committee model with a local authority hosted staff team is not really adequate now, given the pressures on local authorities, and the lack of security is affecting delivery. For these reasons, the local authorities and Partnership for the Shropshire Hills AONB made in 2017-18 a formal request to Defra to create a Conservation Board. This proposal was shelved by Defra due to the announcement of the national review of designated landscapes. We still hold the aspiration for a stronger and more independent body for the Shropshire Hills AONB, in a model which may also be applicable to other AONBs. We recommend that the review looks at the current mechanism of Conservation Boards set out in the CRoW Act, to see if an adaptation of this, or a new model, can be put in place for AONBs. We would be happy to contribute some of our detailed thinking and exploration of options to this debate. Our Business Case for creation of a Conservation Board is available at <http://www.shropshirehillsaonb.co.uk/aonb-partnership/proposed-conservation-board/>.

**CONCLUSION:** The needs of different AONBs varies, but greater use should be made of existing mechanisms such as Conservation Board, and/or new models.

**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?**

The National Association for AONBs is a strong and effective network supporting collaboration and collective working at a variety of levels. We are active members and value this highly. The Association, though stronger than it has been in the past and now with Defra funding, could develop further. We also belong to the Europarc Federation and its Atlantic Isles section, and find this network and learning valuable. We feel there is scope for more collective action and collaboration both between AONBs and with the National Parks.

The National Association has undertaken successful collective action to raise the profile of AONBs including their very high-profile inclusion as shaded areas on Google maps, and Outstanding Hour on Twitter. Though we collaborate well with some individual National Parks on projects, we find the willingness of National Parks collectively to work with the AONB family to be rather limited.

**CONCLUSION:** Collaboration among AONBs is strong, but needs to be built on, and expanded to include better working with the 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 wellbeing?**

The demographic profile of visitors to our AONB and also of those involved more actively is relatively narrow, and active steps to broaden this would be beneficial. Work targeted specifically at including under-represented sections of society can be very effective, but labour intensive, e.g. through active outreach methods. Our AONB Partnership has not undertaken much of this kind of activity due largely to resource constraints, but there is great potential. Our location very close to Shrewsbury and Telford, and within an hour of Birmingham, creates opportunities for wider cross-sections of society to gain benefits from the AONB. We have done some work with schools outside the AONB, and we would like to make some links with the many Duke of Edinburgh groups who visit our area.

Volunteering – we have a good track record of involving volunteers in the Partnership itself, in working groups and more recently through our Friends scheme and AONB Trust charity. We

do a certain amount of practical work with volunteers, but this is limited mainly by the fact that we do not own or manage any land directly. We have also been able to coordinate and manage extensive volunteering programmes through our HLF Landscape Partnership Scheme, but this is only possible through large-scale externally funded programmes, which require significant upfront additional capacity and resources to develop and secure. Effective use of volunteers requires adequate staff time to support it, and we are not able to reach and maintain the potential of volunteering in our area for this reason.

Health and wellbeing are topics which we feel are relevant across a variety of the topics in questions above, and one of the benefits of designated areas which is most under-valued. An issue for the AONB Partnership is that the impact of our activities is often indirect – we help to conserve the landscape which has huge wellbeing benefits. Some of our projects generate activities which more directly involve people and improve their health and wellbeing, but our capacity for this through core funding is very limited, as it is in competition with other under-resourced activities such as involvement in planning.

**CONCLUSION: There is enormous potential for improving people’s health and wellbeing through greater participation, which we are barely scratching the surface of in our current activities.**

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

The core of funding from national government reflects the importance of the statutory designation. Secure core funding enables a small organisation to follow a consistent strategic direction, and absence of such secure funding may cause a small organisation to veer around following whatever funding it can find. We like other AONB Partnerships have been very successful in securing non-exchequer funding from a wide range of sources. However, experience has shown that raising alternative funds for core running costs is very difficult for an organisation which is perceived as ‘public sector’. We do not believe this is a good use of our time and resources, and we try to target fund-raising at direct and tangible delivery. We believe consistent and secure core funding from government is crucial for AONBs in the future.

While insecurity of funding from local authorities remains a critical issue for us as other AONBs, on balance we support a retention of the model including local authority funding. Ideally we need more certainty on core funding over a period of time, and are interested in whether local authorities could be mandated to fund AONB Partnerships to the full expected 25% match against Defra funding.

In 2017-18 we achieved a greater than 5:1 gearing of our Defra core funding and additional sources of income. This has since fallen back due to the end of an HLF Landscape Partnership Scheme. It illustrates the value we provide for the modest core funding, and that we are capable of delivering more with greater resources, but that large new schemes take time and resources to develop. We could double, triple or more, in size and activity and still have much to do towards our AONB Management Plan aims. A greater size of operation would however give us a better critical mass and mean our expertise in particular areas was more secure and less dependent on a few individuals.

**CONCLUSION: Ongoing secure public funding for these statutory designations is vital, and enables us to add value cost-effectively through funding from other sources.**

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

Based on a study we commissioned in 2006, the Shropshire Hills AONB Partnership's view is that our AONB boundary, though not perfect, is largely 'fit for purpose'. We have had a policy for some years of not seeking changes to our AONB boundary, partly on a pragmatic basis due to the difficulty of the process. We believe the process for designation and boundary changes is long-winded and should be improved. If the process of changing boundaries were eased, there would be interest in our area in looking again at potential changes. There are mixed views within the Partnership on this, and it is possible that changes to the boundary would still be contentious and time consuming. Apart from potential minor changes around the Shropshire side, there is evidence and some interest to support designation of areas adjoining the AONB both in Herefordshire and across the Welsh border. Changes of this scale would open up new opportunities, and the pros and cons of having adjacent designations or a larger integrated area would need to be considered, which would require engagement with many stakeholders.

In the mean time we work pragmatically and undertake work beyond the boundary where appropriate e.g. on work regarding rivers and catchments which extend beyond the boundary, working with towns nearby on tourism, etc. This approach works well and is supported by partners. We have also defined in the AONB Management Plan a 'Zone of Influence' around the AONB extending a few kilometres beyond the boundary, which is useful for some purposes. The location of the AONB boundary itself becomes more significant mainly in relation to planning issues. There is evidence that the designated area is being harmed by cumulative unsuitable developments just outside the boundary.

**CONCLUSION: The process of designation should be streamlined, but not all our activities are constrained by the designation boundaries.**

## **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**

There is growing interest in and around the Shropshire Hills in the possibility of the AONB (or a wider area) becoming a National Park, and the Review has prompted more discussion on this topic. Arguments in favour are achieving greater planning protection for the area, independent status with broader purposes and better resourcing, and greater recognition. These are all significant issues for our AONB, and include the key drivers which lay behind our 2017-18 bid for creation of a Conservation Board. There are some concerns about whether a National Park may attract significantly more visitors and potential for change to the character and quality of the area, effects on affordability of housing, and about possible negative perceptions in some sections of the local community.

The Shropshire Hills AONB Partnership retains its ambition to achieve a stronger governance structure, as expressed in our bid for a Conservation Board. We would wish to consider the options for designation and governance in more detail after understanding the recommendations of the Glover review and the government's response.

We do not express a view on marine or urban landscapes, but note that the Community Forests were set up by the Countryside Commission partly to address urban-fringe settings, and still exist though without any statutory designation.

We would reiterate that if a two-tier system of landscape designations is to continue (based on current National Parks and AONBs), the rationale for the distinction between the two needs to be made clearer. Creation of a new designation as an additional tier could make the situation even more complicated.

**CONCLUSION:** Designating landscapes and resourcing local organisations to work in them with the community is a way of making sustainable development happen – it works and there should be more of it.

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

The purposes of the Scottish National Parks are more modern than those of the English and Welsh ones, and may have elements to borrow:

- 1. To conserve and enhance the natural and cultural heritage of the area.*
- 2. To promote sustainable use of the natural resources of the area.*
- 3. To promote understanding and enjoyment (including enjoyment in the form of recreation) of the special qualities of the area by the public.*
- 4. To promote sustainable economic and social development of the area's communities.*

Potential advantages here may be a move away from the somewhat archaic and problematic 'natural beauty', and the inclusion of sustainable use of the natural resources.

The recent review of designated landscapes in Wales also has applicable lessons. The aspiration to narrow the gap between AONBs and National Parks is one of these. The language of 'sustainable management of natural resources', though applicable in Wales both in and out of designated areas, is helpful and something similar could be used in updated purposes for AONBs (and possibly National Parks).

The experience of AONBs in Northern Ireland and of National Scenic Areas in Scotland show that with a weaker statutory basis and/or even less resourcing, the potential of these designations to deliver benefits to society is considerably reduced.

Many European countries have a tier of designations below National Parks and these (including AONBs) were studied in a recent project in which we participated. We commend this report to the Panel <https://www.european-parks.org/publications/book-living-landscapes>. These are mostly IUCN Category V protected areas, in which cultural landscapes are very important. Lessons include:

- The value of integrating conservation and sustainable development.
- The need for political and societal support, and secure structures, for these designated areas to fulfil their potential.
- Actions to support biodiversity, sustainable tourism and environmental education are highly valuable. Designated areas address some of the major challenges of our time such as climate change, sustainable food production, the water environment, and people's wellbeing.
- Strong community engagement brings a high level of acceptance among the local population. The designated areas contribute to local identity and culture.
- Working with farmers and land managers, designated areas can help to sustain both environmentally friendly farming and businesses, including locally distinctive produce.
- These areas bridge national and local government.
- Designations and the organisations supporting them help to promote values and actions which encourage conservation of the areas.
- The designated areas are highly valued for their contribution to the economy and people's wellbeing, as well as their environmental benefits.

- Designated areas can be models of sustainability and innovation, and lessons can be applied elsewhere.
- Rural development programmes can be successfully integrated with conservation.
- Networks of designated landscapes are extremely valuable for learning and sharing.

**CONCLUSION:** There are many lessons from other countries – especially that with political support, resources and sound operating principles, more can be delivered. We must continue to share and participate in designated landscape networks.

## **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?**

The 'Area of Outstanding Natural Beauty' title is long and conveys an inaccurately narrow picture of the aims, while the 'AONB' acronym is said incorrectly almost without fail at every local and national AONB event.

We believe a new title is definitely needed in combination with a desirable update in the language of the purposes of designation. This could really help to boost public understanding and recognition of AONBs. The brand values need to be conveyed by a title, and it needs to reflect a clearer rationale for the difference between AONBs and National Parks, as set out earlier.

The National Park name should remain, but a possible solution for all AONBs to become National Parks seems highly unlikely. A new title for AONBs is not easy, but we would suggest something relatively short which ideally would avoid use of an acronym. Regional Parks would not be an appropriate name as the designation is national, and the term 'park' is not welcomed by many land managers. Possible alternative names are 'Outstanding Landscape' or 'National Landscape'. Any new name will feel unfamiliar and a bit clumsy to start with, and we need to see beyond this when considering options.

Many European second-tier designations are Regional or Nature Parks, which do not seem appropriate to us, but we note use of 'Protected Landscape Areas' in Czech Republic and Slovakia, and 'Landscape Parks' in Poland.

It has been observed that unlike National Parks, the term 'area of outstanding natural beauty' is only used in lower case in the legislation, and therefore it may be possible to use a different title (like a trading name), without requiring any change to legislation.

**CONCLUSION:** A new name for AONBs is needed, and a suitable process involving both stakeholders and experts is needed to find one.

## **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?**

We have many of these other designations within the AONB and work closely with those responsible for them. Often such designations are smaller than the AONB and sit within it. National Trails are an exception, which would usually extend more widely (in our case Offa's Dyke Path which runs through three AONBs and a National Park). We do not believe there is

anything institutional required to make these relationships work better, liaison between staff is the main requirement. Resourcing and staff levels, for both the AONBs and the other designations, are therefore important to making this happen.

We have done a great deal of work on the River Clun SAC, although it lies outside the AONB, since there was a gap to fill, and many of the upstream influences on the site lie within the AONB. We are also through the 'Our Common Cause' upland commons project working with partners on an NNR and an SSSI, providing a valuable facilitation and liaison role.

**CONCLUSION: AONB teams can add value to these other designations and help to integrate them into the wider landscape and activity.**

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

This response is made on behalf of the AONB Partnership, and a draft of it was discussed at a meeting called specifically for this purpose on 4<sup>th</sup> December 2018.