

Report 6: Response to Defra consultation on the Landscapes Review

1. Purpose of Report

The purpose of this report is to agree the Authority's response to the Defra consultation on the Landscapes Review (Glover Review).

2. Recommendations

The Authority is recommended to:

- a. Note the content of the Government's response to the Landscapes Review published on 14 January 2022.
- b. Review and comment on the draft response to the Defra public consultation questions issued as part of the above response.
- c. Discuss and comment on the supporting statement from the Authority which sets out our wider views on Government's response to the Landscapes Review; and
- d. Authorise the Chief Executive, in consultation with the Chair, to agree and submit the Authority's final response and supporting statement.

3. Implications

- a. **Financial:** There are no direct financial implications from the Authority's response to Government. However, Government's vision and proposals for the future role of national parks is likely to place additional burdens on the Authority. At this time these have not been quantified, nor has there been any indication from Government as to how they are to be funded.
- b. **Equalities:** The proposals for greater diversity in the governance of national park authorities and the wider ambition of 'national parks for all' should deliver greater equality of engagement and representation.
- c. **Link to Business Plan:** The proposals and changes in legislation which may flow from the Government's response to the Landscapes Review will have a potentially significant impact on the priorities and operations of the Authority and will help drive and shape future business planning. Reassuringly, the Authority has already made significant progress and impact on many of Government's ambitions within our current Business Plan.

4. Background

- a. The independent Landscapes Review was led by Julian Glover and reported in September 2019.
- b. The review contained 27 detailed proposals, covering five themes:
 - Landscapes alive for nature and beauty – which proposed a key focus on nature recovery.

- Landscapes for everyone – with a stronger mission to connect all people with national parks and AONBs.
 - Living Landscapes – which proposed a new purpose to promote socio-economic well-being of local communities, upgrading this from a duty for national parks.
 - More Special Places – recommending more protected landscapes, AONBs to be given national parks status and greater co-operation to improve landscapes.
 - New Ways of Working – in order to make more of the ‘sum of the parts’, a new National Landscape Service was proposed, with reformed governance of protected landscapes and a new funding model, with more and more diverse funding. A clear recommendation in the Landscapes Review that our funding should be “secured in real-terms and sustained for at least five years”.
- c. Whilst there were many positive recommendations within the 2019 Review Findings, they were not new to the Authority. With the opening of The Sill in 2017, and throughout its development from 2014 onwards, the Authority has made engaging more and different audiences one of our key priorities. In fact, for an organisation with a Defra grant of c£2.5m at the time we invested over £14m in this priority, largely from non-government sources. In addition, the Authority had greatly diversified our income sources, growing fundraising through The Sill and other projects, as well as greatly enhancing our commercial income activities, growing these from c£200,000 to £1m from 2013 to 2021. From 2006 onwards we grew both our farming and community support teams, being the first national park to employ community enterprise officers, roles which have been lost through successive funding cuts and which would in fact be highly relevant to the delivery of the ambitions set out in the Government response. Following reorganisation of local authorities in Northumberland we reduced the size of our Board from 22 to 18 and balanced the representation across local authority, parish council and SoS appointed national members.
- d. The above accepted, the Authority recognises the opportunity presented by the Landscapes Review and is keen to support positive change. Where we have felt the recommendations of the Review were not in the best interests of our finest landscapes, such as in the case of a centralised National Landscape Service, this Authority has been clear in making our views known and explaining them.

5. Government Response to the Landscapes Review

- a. The Government Response is structured around four themes:
- **A more coherent national network**
 - **Nature and climate**
 - **People and place**
 - **Supporting local delivery**
- b. Within a **More Coherent National Network** Government proposes:

- Strengthened AOBs: Bringing their purposes in line with those of national parks, and renaming them 'National Landscapes';
 - A 'National Landscapes Partnership' rather than a 'National Landscapes Service', to champion protected landscapes, share knowledge and expertise, and generate additional private income through strategic partnerships;
 - Re-invigorating Natural England's role as the statutory advisor on England's Landscapes; and
 - Preparation by Government of a National Landscapes Strategy.
- c. **Nature and Climate** proposals include:
- Revising the first statutory purpose to include 'nature recovery';
 - Options for the role of protected landscapes in the future Environmental Land Management Schemes; and
 - Target outcomes for protected landscapes to contribute to Government's goals for nature recovery and climate change.
- d. **People and Place** includes:
- A revised second statutory purpose with health and wellbeing as a clear outcome, together with the need to improve opportunities and remove barriers for all parts of society;
 - No provision for a third socio-economic purpose as proposed by Glover;
 - Proposals for fixed penalty notices for byelaw breaches, provision for Public Space Protection Orders, Traffic regulation orders to control the amount and type of traffic on roads; and
 - No support for the national landscapes Housing Association proposed by Glover.
- d. **Supporting Local Delivery** focusses on governance and resources, including:
- Reduced Board sizes;
 - Authority Chairs appointed by the Secretary of State;
 - Performance standards for board members including performance reviews, fixed-term appointments, and removal of under-performing board members;
 - Merit based local nominations/appointments;
 - Enhanced diversity of skills and representation;
 - Strengthening the current legal duty on public bodies to have regard to national park and AONB purposes; and
 - Giving National Park Authorities a 'General Power of Competence' which would broaden our ability to engage with a wider range of activities and initiatives beyond our current 'Functionally specific' power of competence.

6. Engagement and Analysis

- a. Shortly after the publication of the government response and consultation, the Authority held workshops with both its staff and members. These were useful in both helping to explain the content of the government response, but also served in developing an initial analysis of the response, as well as some early responses. Members agreed unless there was a strong call for a further meeting to discuss the consultation, that the Chair and Chief Executive should present a draft response to the Authority meeting in March.
- b. Both staff and members have since been invited to submit their views to both the Chair and Chief Executive. A small number of responses have been received. In addition, officers from the Authority have been involved in a number of Defra hosted 'deep dives' which have looked in greater detail at the proposals and consultation questions. These meetings have been useful in hearing some further explanation from Defra as well as the initial responses from a wider variety of stakeholders, including many environmental NGO's and other representative bodies.
- c. It is clear from the government response and from the presentations at these 'deep dive' meetings that Government is proposing an ambitious new vision for our protected landscapes and that they accept that the scale of the ambition must be matched by equivalent resource to ensure effective delivery. However, the Government response states that there is limited scope to increase the core grant. The proposition is that the ambitious vision will be funded through private sector investment and commercial income.
- d. There is a lack of clarity in many of the proposals, with no detail on how they may be taken forward. Whilst this may be firmed up following the consultation responses, it does make it difficult in many cases to frame a detailed rather than a general response, particularly when the degree of change or level of financial burden is unclear.

7. Responding to the consultation

- a. It is proposed that the Authority submits a direct response to the consultation, whilst being mindful that National Parks England will also be submitting a response on behalf of the 10 English national parks. In addition, NPE will be sharing views with the National Association of AONBs with a view to making responses in areas of common interest and agreement. The Authority has also been liaising closely with our two nearest AONBs in the North Pennines and the Northumberland Coast, each of whom will be submitting individual responses. We also plan to share our draft response, following member approval, with many partners and stakeholders.
- b. In addition to addressing each of the consultation questions, it is proposed that the Authority submit a Supporting Statement to Defra. This will help put our response in context and will also allow the Authority to address important points which are not the subject of consultation questions such as the proposed National Landscape Partnership.

- c. Annex 1 sets out the Authority's draft response to the consultation questions and Annex 2 sets out a Draft Supporting Statement. Both are tabled for discussion and amendment by members.
- d. The consultation runs until 9th April and therefore there is adequate time to take on Board members comments and amend these response documents as necessary. It is proposed that the authority is delegated to the Chief Executive, in consultation with the Chair to agree and submit the final responses to Defra.

8. Conclusions

- a. The publication of Government's response, and associated consultation, on the Landscapes Review is welcomed, as is the positive ambition for England's finest landscapes.
- b. Whilst on the face of the response there is much to support, there is a lack of detail on how many of the proposals are to be achieved, and within what timescale. Further, there has been no detailed costing of the many proposals and it is therefore unclear how these may be resourced.
- c. More fundamentally the Government response does not deliver the resources to deliver more called for in the Glover Review, and so there is a real threat that in setting such new ambition that protected landscapes may be set up to fail if additional resources are not forthcoming.
- d. Members are asked to review and comment on the draft response to the Defra consultation and the draft Supporting Statement. Following the Authority meeting officers will reflect on the comments made by Members and amend the draft response accordingly, before seeking sign off from the Chair of the Authority and submitting to Defra in April.

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Background papers: Landscapes Review : September 2019
Government response to the Landscapes Review: January 2022

Appendix 1

Government response to the Landscapes Review: Consultation

Draft Response of Northumberland National Park Authority

A Stronger Mission for Nature Recovery

6. Should a strengthened first purpose of protected landscapes follow the proposals set out in chapter 2?
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We support the proposal to amend the first purpose and the reasons for doing so. If the first purpose is to be changed then we would recommend any revised wording retains the words 'special qualities'. (See Supporting Statement)

Any strengthened first purpose should bring with it the necessary powers and resources to enable protected landscapes to deliver effectively.

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

Please see Supporting Statement.

Agricultural transition

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

Designing the environmental land management schemes in a way that works for all farmers and land managers, including the specific circumstances for those in protected landscapes, recognising that farmers in these areas are well-placed to deliver on our environmental priorities.

We do not feel this addresses the specific opportunities in protected landscapes, nor does it reflect the ambition of the Landscapes Review Panel.

Using Local Nature Recovery Strategies (LNRS) to identify projects or habitats within protected landscapes.

This option also does not address the proposals in the Landscapes Review Panel. It does not reflect a central role for protected landscapes. In addition, the current proposals do not provide any clarity on what role protected landscapes are being expected or resourced to play in the development and delivery of LNRSs. This is a significant omission and needs clarification.

Monitoring the effectiveness and uptake of the new environmental land management schemes in protected landscapes. Using this to inform whether further

interventions are needed to ensure we are on track for wider nature recovery ambitions.

This option again falls short of the proposals of the Landscapes Review Panel. It suggests a ‘wait and see’ approach. This is not pro-active in seeking to take the opportunities which ELM provides in delivering significant positive change within protected landscapes. Whilst monitoring of both the uptake and outcomes should be an essential part of ELM going forward, waiting to see what happens is not a satisfactory approach to delivering the best for our finest landscapes.

Creating a clear role for protected landscape organisations in the preparation of Local Nature Recovery Strategies. Our recent LNRS consultation specifically asks for views on the role of different organisations in the preparation of LNRSs, including protected landscapes.

We would welcome clarity on this through the Nature Recovery Green Paper, as well as a clear indication on how PLs are to be resourced to deliver this role.

Any role for PL bodies should be a leading role for that part of any LNRS which covers the protected landscape, accepting that some LNRS areas may be bigger than individual PL boundaries.

This does not however address a central role for protected landscapes in ELM as envisaged by the Landscape Review Panel and which is necessary if ELM is to support the future vision for protected landscapes. See Supporting Statement.

Building on FiPL, empowering protected landscapes to support decision-making and delivery against agreed priorities, including through dedicated project coordinators and advisers.

This is the option with greatest potential. We support building on the positive experience of FiPL, however, FiPL is a time-limited and relatively modest grant programme and is still very much in its early days at the time of this consultation. Secure funding, over a much longer period will be required to deliver the pace and scale of change required by Government’s ambition.

We believe any role should go beyond provision for project co-ordinators and advisors to provide delegated funding to allow protected landscapes bodies to tailor schemes locally and to address key priorities in their areas.

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

Northumberland National Park Authority has, for over 20 years, had an in-house farming team. In 2006 we made a deliberate decision to strengthen this team to ensure that farmers and land managers within the Park could take maximum advantage of the then new countryside stewardship schemes. This proved to be very successful in both building strong

knowledge and understanding between land managers and the Authority, and was very effective in encouraging uptake of and adding value to schemes.

By 2016 almost 100% of the farmed area of the Park was in some form of environmental stewardship scheme, and these agreements, the majority of which were developed or informed by the NNPA farming team, with advice from specialist officers, were focussed to help deliver key national park objectives.

These objectives included not only nature conservation outcomes but also included important public access and cultural heritage initiatives.

Following successive funding cuts from 2010 onwards, the size of the farming team in the Park has shrunk to just three full time equivalent. Whilst this team maintain close and trusted working relationship with farmers and landowners across the Park, this team needs further resources if it is to deliver the best for the Park through ELM. Therefore, a central and resourced role for protected landscapes, as set out by the Glover Panel is important.

ELM with a central role for protected landscape bodies could build on the existing success and help connect key national outcomes with opportunities within individual protected landscapes.

It is therefore important that ELM addresses all public benefits within protected landscapes and does not just focus on 'nature' and 'climate'. We should be seeking to deliver multiple environmental (natural capital) benefits, including cultural heritage, the historic environment and public health and well-being.

As stated elsewhere in our response we would like to see a degree of delegation of funds to protected areas to allow them to shape ELM, or at least part of it, locally to take advantage of local opportunities in pursuance of national outcomes.

10. Should AONBs have a second purpose relating to connecting people and places, equivalent to that of National Parks
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We would support a strengthened second purpose being extended to AONBs. We would point out however that national parks and AONBs are not the same in respect of the second purpose. One of the key differences in the initial designation of national parks and AONBs was the different pressures, visitor, and development, that were seen to be facing what are landscapes of equal value in terms of 'natural beauty'.

Not all AONBs, and indeed not all national parks are the same, but what all national parks have in common is that they are subject to significant visitor pressures and to a varying degree, development pressures. If the second purpose is to be extended then Government should be clear as to the reason for doing so, as this represents an additional burden to protected landscapes.

There is little mention of how this burden will be funded, and there is clearly concern if the overall protected landscape budget doesn't increase as this could impact negatively on national park budgets. While the 2021 spending review is mentioned - no clear indication on details or impact for national parks is set out.

A stronger mission for connecting people and places

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

We would support the proposed revisions to the second purpose to focus on well-being. As in the case of proposed amendments to the first purpose we would request that reference to the 'special qualities' is retained.

We recognise and agree that the thrust of the proposed amendment is to move to a more 'active' position where greater opportunities for all are provided and barriers to engagement removed. We welcome this, however, ensuring 'equality of access' will require adequate resourcing. Access for all goes beyond a campaign or a single time-limited project. It will require a fundamental look at and provision of new visitor information and most importantly infrastructure if it is to be realised. This cannot be left to programme funding or private donors. Whilst they will have a role to play in adding value, impact and scale, core resources will be needed within protected landscapes to drive this forward.

By way of example, following the cuts in public sector funding from 2011 to 2016, Northumberland National Park Authority has had to cut back its maintenance programmes to the 30% most heavily used rights of way in the national park. The current level of resources does not allow us to begin to address access for all in the way that is needed.

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

Please refer to our comments about retaining reference to 'special qualities' and our Supporting Statement.

Managing visitor pressures

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

Whilst welcoming the fact that the Government recognises the pressures on National Parks in terms of visitor management and anti-social behaviour, we do not believe, in the context of the wider vision and outcomes envisaged in the Landscapes Review, that this is a priority for policy development or resourcing.

Northumberland, like all national parks does from time to time, and particularly post easing of Covid lockdowns, experience negative visitor behaviours. We see the challenge as one of visitor management, rather than one of enforcement.

If we are to achieve the ambition of national parks for all then we will need to adequately resource visitor management in its widest sense, not simply control negative behaviours. Whilst we agree powers to control behaviour and prevent damage to the fabric of the Park and negative impacts on local businesses and communities are necessary, we believe greater emphasis needs to be focussed on preventing such problems through adequate

visitor infrastructure, visitor engagement and visitor information, including continued positive roll out of the countryside code.

Issue Fixed Penalty Notices for byelaw infringements – Whilst this would be useful to have, we do not consider it a priority. Other authorities are better placed to undertake this.

Make public spaces protection orders (PSPO) – We do not feel this is an effective measure at this time. During the summer of 2020, NNPA did explore with our partners in Northumbria Police and Northumberland County Council, the potential for such measures, however the threshold of evidence needed to enact a PSPO was deemed to make it not effective in the circumstances we were experiencing.

Issue Traffic Regulation Orders (TROs) to control the amount and type of traffic on roads – We can see how this may be necessary, but we are not convinced it is a role for protected landscape bodies. It should rather be a role for the relevant highway authorities.

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

See above.

15. For which reasons should NPAs and local authorities exercise this power

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

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

The role of AONB teams in planning

Questions 18 to 20. Relating to the role of AONB teams in planning

Planning is a key tool in helping deliver the statutory purposes of national parks. For this reason, we would support an enhanced role for AONBs in planning.

It is clear from the Government response that there is no intention to make AONB teams the local planning authority for their area, as is the case for national parks.

Whilst we would like to see an enhanced role and influence on planning decisions for AONB teams we feel the precise nature of this needs to be agreed between the current local planning authorities for the area and AONB management bodies as part of a separate exercise.

Whilst much of the thrust of the Government response is about levelling up AONBs in relation to national parks, we would not wish to see a levelling down of national park authorities planning powers in any respect as this would represent a significant retrograde step in protected area management.

Local governance

21. Which of the following measures would you support to improve local governance?

Improved training and materials – support

Streamlined process for removing underperforming members – We support the principle of this as all members should be accountable for their performance, and we recognise there are weaknesses in the existing arrangements. It is difficult to comment without further detail on how this would work.

Greater use of advisory panels – We support this as long as it is determined within the needs and circumstances of individual protected landscapes and is not determined as a one-size fits all approach.

Greater flexibility over the proportion of national, parish and local appointments – We support this, but in the context of achieving a workable balance of representation for individual protected landscapes and not as a means of weakening local representation, which we believe the original proposals of the Landscapes Review Panel would have delivered.

In Northumberland National Park Authority we took the opportunity to amend our board composition from that established in the 1995 Environment Act when Northumberland Council transferred to a unitary authority. Through an Order, we reduced our membership from 22 to 18 and changed the composition of the Board to equal number of members from local authority, parish council and national (SoS appointed) members. This has provided a good balance, with no one category of appointee being dominant.

Merit-based criteria for local authority appointments – We do not support this proposal. Whilst the ambition for skills/merit-based appointment is laudable, there are real difficulties on how this might work in practice. A situation which could lead to an elected councillor being deemed inappropriate for appointment to the national park authority when this is

within their ward, could be deemed undemocratic and be seen to undermine local representation.

Reduced board size – We welcome the Government response which gives flexibility for national parks to determine the most appropriate size and composition of their boards at a local level. Northumberland National Park Authority is open to considering a further reduction in the size of its board and is happy to engage pro-actively with Government in considering options.

Secretary of State appointed chair – We do not support this proposal. As free-standing local authorities, established under the 1995 Environment Act, the Chair should be appointed locally by the other Members of the Authority.

A clearer role for public bodies

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

We strongly support this proposal. This is something national park authorities have been requesting for some time, as the current ‘have regard’ duty is not fit for purpose

We believed a strengthened duty should require relevant bodies to ‘further’ National Park purposes.

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

Yes, we would support a link to management plans, however, the primary relationship should be to national park purposes and duty, as these are the underlying and constant legal roles of national parks and AONBs. The Management Plan is an expression of these purposes and duty as developed and refreshed from time to time.

We would not wish to see any weakening of the requirement to further National Park purposes simply because of a lack of direct reference in a Management Plan.

General power of competence

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

We support a general power of competence for National Park Authorities.

Overall

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

Please see our Supporting Statement.

Appendix 2

Landscapes Review Response: Northumberland National Park Authority Draft Supporting Statement

Positive Ambition

- a. The Government response takes a positive and, in many areas, a pragmatic approach to many of the Glover proposals. The proposed changes to National Park purposes are positive – especially the focus on ‘nature recovery’ and being proactive in terms of access by all parts of society. It recognises the part national parks can play in the ecological, climate and public health crisis; all ambitions with which NNPA would agree.
- b. We feel the response is largely silent on cultural heritage, and especially the historic environment which represents a significant element of the special qualities of many national parks and AONBs. We would encourage Government to recognise this in its final response and to ensure that national parks purposes, future guidance on management plans, and the proposed Landscape Strategy fully recognise and embed recognition of cultural heritage in what are, after all, cultural landscapes.

Powers and resources

- a. The single greatest area of weakness within Government’s response is in respect of resources. We do not believe it is consistent to propose significant and far-reaching ambitions such as nature recovery or national parks for all without backing this with the resources and powers to deliver them. It is simply not sufficient to export the achievement of such ambitions to leverage of greater private sector funding.
- b. Successive reductions to the core budgets of national park authorities, particularly the least funded authorities, has led to severe pressures on resources and arguably have and are continuing to undermine the ability of some park authorities, such as Northumberland to take advantage of new approaches. So, whilst we share the ambition of doing more for nature and people, we do not have the powers and resources to do this and urge Government to follow the recommendations of the Glover Panel in respect of government funding. Without such provision there is a fear that protected landscape bodies may be being set up to fail in the light of such ambition.
- c. The reality we in Northumberland face is that we employ one officer in most of our specialist areas. One full-time ecologist, for example, must support statutory services such as planning as well as working on nature conservation and recovery. Most of our teams, in a full staff team of 70, consist of 3 or 4 people. As a special purpose local authority and a local planning, we carry considerable statutory burden and current resourcing has left us on the edge of viability.

- d. Whilst we support the proposal to give greater powers and resources to AONBs, we would strongly appeal that this is not at the expense of national parks. For Authorities such as Northumberland our Defra funding is closer to that of a larger AONB than it is a better resourced national park authority. We welcome therefore the proposal to look at a more transparent funding formula for protected landscapes and would ask that this is taken forward as a matter of priority and that it addresses the fair allocation of national park grant. We would ask also that a fresh assessment is made as to the minimum level of resources required to operate a national park authority, as we feel the current level of grant in aid from government has left Northumberland close to or below an effective level of resourcing.

Collective Achievement

- e. Northumberland National Park Authority supports the ambition to ensure that collectively protected landscapes deliver more for the nation and achieve more than the sum of their parts. The Authority is, however, strongly opposed to a 'centralised' National Landscape Service. Whilst the Authority supports the current Government proposal for a non-statutory National Landscape Partnership (NLP), there is very little detail within the Government response as to the precise role and powers of this new partnership, how it will be funded and its relationship with the other national bodies.
- f. We would request that individual national park authorities are, and remain, closely involved in the discussions to develop the new structure, as the relationship with local structures is critical.
- g. There seems to be some suggestion at a role in the National Landscape Service for National Parks Partnerships Limited. We do not consider this appropriate, as NPPL is a Limited Liability Partnership, jointly and equally owned by all 15 UK national parks and with a specifically defined remit. Its inclusion in a NLP would in our view duplicate the role of National Park's England, as well as extending beyond its remit.
- h. Whilst the proposed National Landscapes Strategy and outcomes framework offer great potential to record and recognise individual and collective achievement, we would not wish to see this, when taken together with the proposed National Landscapes Partnership, lead to 'creeping centralisation'. We believe it will always be important for national park authorities, as free-standing local authorities, to have, where necessary, direct and strengthened access to Minister and that other bodies or the proposed National Landscape Partnership do not act as gatekeepers.
- i. We would ask in this context for further clarification on how Natural England as the statutory advisor on landscape will ensure that the full purposes of NP's are supported and championed? This is not made clear within the Government response.

Welcome not Enforce

- j. There is, in our view, a conflict between the positive ambition to ensure our finest landscapes are available for all in society and the proposed new enforcement powers. With the development of The Sill in Northumberland National Park, which started in 2014, we have made a concerted effort to be a welcoming Park. Culturally and through our communications we believe we are on our way to achieving this, despite the many barriers to inclusion, such as transport, which remain. Our experience has held us in great stead during the influx of visitor to the Park following the easing of Covid lockdowns. Whilst visitor pressures did bring challenges, and inappropriate visitor behaviour, we see this as an opportunity to be addressed through positive visitor engagement and management, rather than something to be policed and controlled. We advocate an approach of welcome, engage, discover and value, over one of enforce.
- k. It is much better to invest limited resources to engage, influence and educate. We need to expand education and engagement activities, particularly with those who are not currently represented and those who can most benefit, and to resource 'boots on the ground' through expanded ranger and volunteer services where people can be supported to gain the most from their visits and to visit responsibly and sustainably. Protected landscapes strength is in convening good local networks, partnership, and land management relationships. In Northumberland this was shown during Covid when we pulled together key partners and identified risk and need in a proactive and engaging way. Adding more engagement resource where it was needed on the ground, funded externally through NHLF.
- l. National parks were designated with public health and well-being as one of the driving reasons for their existence. As we face global challenges in public health, both physical and mental, our protected landscapes have a refreshed role to play. There is significant experience across our protected areas, however, this goes largely unnoticed by national and regional policy makers. This is one area where a real need and opportunity exists to make more of the sum of the parts. We believe this needs to take an evidenced based approach to public well-being.

Special Qualities

- m. Whilst supporting the intention of the proposed changes to National Park purposes, we would ask that any amended wording retains the term 'special qualities'. This is an important policy and planning tool for national park authorities. It provides an opportunity for each National Park to identify the qualities that make its landscape special and aids definition of local distinctiveness. The phrase is used in the major development (planning) test, cited in appeal decisions and is clearly relevant to work on landscape character and design.
- n. Neither the Glover recommendations nor the Government response place much focus on cultural heritage, yet our national parks and AONBs are cultural landscapes,

shaped by the interaction of people and nature. Cultural heritage, including the historic environment, is one of the key special qualities of Northumberland National Park, retaining the phrase 'Special Qualities' in the wording of our purposes will ensure this and other aspects of our unique qualities in Northumberland can be adequately provided for both in policy and in decision making.

Embedded locally whilst delivering nationally

- o. It is important that national park authorities are embedded locally. There is a danger that the proposed changes to National Park governance could undermine local accountability, including democratic accountability through 'merit-based' appointments. Whilst good governance practice support limits to board membership, fixed term appointments could also lead to the exclusion of local democratically elected representatives. A great strength of Northumberland National Park Authority is that it is seen as a strong local and regional partner, accountable both locally and nationally. Any loss of local accountability could lead the national park authority to being seen as 'other', and this could greatly impede partnership working and trust at the local and regional level.
- p. The proposal for the Secretary of State to appoint national park authority Chairs is not supported by NNPA. This would be seen as part of a centralising agenda, at the cost of local accountability.
- q. Delivering and working with, including supporting and advocating for, local communities, is a key element of the UK model of protected landscapes. Whilst the government response makes clear why it does not support elevating the socio-economic duty to a purpose, the response is light on how protected landscape bodies or their partners can support communities. With the loss of the English Rural Development Programme, there is a policy and resourcing vacuum for supporting rural communities, including those in our deepest rural areas, often within protected landscapes. This is something we feel Government needs to address to ensure the future of our national parks and AONBs and their local communities can be taken forward in a balanced way. The lack of basic infrastructure in remote areas such as Northumberland National Park (where 10% of domestic properties remain off the electricity grid) is severely limiting sustainable progress which could be made to support the local communities and businesses. The experience that some of our residents have include poor rural transport provision, poor access to support services, fuel poverty, off grid and digital connectivity. The recent Storm Arwen and subsequent storms have brought into sharp contrast the overall resilience of our rural infrastructure.
- r. Northumberland National Park Authority is supportive of the principle of smaller boards and is willing to consider what might be achievable for Northumberland. We would welcome positive engagement with Government on this, whilst recognising the Authority will need to retain sufficient skills and number to effectively perform its statutory functions, including its important role as a local planning authority.

- s. The Authority further support the proposals for greater diversity of skills and experience, but it is unclear from the government response how this might be achieved. We do not feel this should be at the expense of local accountability, and again would welcome the opportunity to work positively with government to explore how this could be achieved.

Environmental Land Management (ELM) and Local Nature Recovery Strategies (LNRS)

- t. The Landscapes Review set out a clear recommendation for protected landscapes to have a central place within the new ELM schemes. ELM, like Countryside Stewardship will be a key tool to deliver national park purposes, yet the government response fails to adopt the Glover recommendations, offering only some options, most of which in our view fall short of what is needed.
- u. Northumberland National Park Authority through its dedicated farming team have a strong track record of engagement with farmers and landowners, and with environmental support programmes, having achieved at one time almost complete coverage of the farmed areas of the Park with environmental stewardship initiatives. We are currently also delivering the successful Farming in Protected Landscapes Scheme.
- v. Giving protected landscapes a central role in ELM provides an opportunity to build on the long running and trusted relationship between our farming team and farmers and land managers in the park. At a time of such flux in land management, it would be a missed opportunity not to invest in our experience in this area. We would ask the Government are clear in defining a central role in the delivery of ELM for protected landscapes beyond the current position in the consultation.
- w. Likewise, reference to Local Nature Recovery Strategies and the role for protected landscapes is ambiguous within the Government response. We would ask for a clear role for protected landscapes with LNRS and ask for assurance that the necessary resources are made available, as they are for other public bodies involved with LNRSs, to ensure we can play a leading role in convening at a national park level.

Planning reform

- x. Northumberland National Park welcomes the references to planning reforms within the Government response. Great strides have been made in the last decade in building close relationships with Government in recognising the special planning challenges in national parks and the need for specific policy as part of national guidance. We welcome the indication that this is to continue.
- y. Given the vision for natural beauty and nature within the Landscapes Review, Northumberland National Park Authority would request that serious consideration is given to bringing forestry within the definition of development. Forestry, particularly

large-scale commercial plantations and associated forestry operations has changed the landscapes of our national parks and AONBs at a significant scale and for generations, yet forestry creation is not deemed as development in the context of statutory planning. We feel this needs to change if some of the outcomes envisaged through the landscapes review are not to be undermined by inappropriate forestry development.

- z. Whilst we welcome an ambition of tree planting nationally to support high levels of carbon sequestration, we believe this need to be achieved in ways that support nature, natural beauty and landscape enhancement. We believe the proposal to enhance the current S62 duty of regard, even with effective implementation of the UK forest standard will be insufficient to control forestry development under the current consent regimes.