

Landscape Institute

Final Response to the Glover Review of Designated Landscapes

23th October 2019

Key messages:

- The Glover Review of Designated Landscapes is an imaginative and ambitious document that should be welcomed for its drive to strengthen the services provided by our landscapes.
- The drive to improve landscapes nature, beauty and natural capital is commendable, in particular the mechanism of strengthening management plans and the creation of Nature Recovery Networks.
- We welcome the recognition that AONB and National Park landscapes sometimes deliver the same “public offer”, but the levels of protection and resources granted are disproportionate. The recommendation for realignment of purpose is vital, and there is an opportunity to add some additional protections, and to review the typology of designated landscapes.
- We strongly support the proposal to strengthen the "existing duty required of National Parks, to seek to foster the social and economic wellbeing of local communities in their area", and to make this a third statutory purpose "which should then apply to all national landscapes not just National Parks".
- The role of planning in national landscapes needs reform, current guidance is not being used to its full potential and is often failing to enhance these landscapes.
- We hope to play a major role in helping promote and grow the workforce needed for designated landscapes to thrive.

The key paragraphs from the report that really reflect the importance of our landscapes are below, this call to action is something that our membership and profession is keen to press forward with

Our country is changing fast. It is becoming more diverse. More urban. Much busier. New forms of farming, carbon emissions, the sprawl of housing, new technology and social shifts have changed the relationship between people and the countryside, and left nature and our climate in crisis.

The way we protect and improve our landscapes needs to change radically to respond to this. If their natural beauty is to be in a better condition 70 years from today, even better to look at, far more biodiverse, and alive with people from all backgrounds and parts of the country, they cannot carry on as they do now.

Landscapes Review Page 7

Who we are

The Landscape Institute (LI) is the royal chartered body for the landscape profession. The LI represents 5000 landscape managers, landscape architects, planners, urban designers, and landscape scientists, working across urban and rural areas.

We accredit our professional members; uphold standards; provide training, information, and guidance; and undertake research and policy work on behalf of the sector. As a professional organisation and educational charity, we work to protect, conserve and enhance the built and natural environment for the public benefit.

Some of our members work directly within the administration bodies of designated landscapes, or within related bodies: such as Local Planning Authorities, Natural England, etc. Many will work in/with designated landscape contexts to some degree during their career: whether designing, planning, assessing, or managing landscapes. This response represents their views, gathered through direct consultation.

Our proposed actions to support designated landscapes

As the chartered body for landscape professionals our work has had strong and ongoing involvement with the designated landscape sector. We currently provide industry standard guidance for professionals working within designated landscapes and have recently launched a new Continuing Professional Development (CPD) programme for Park Managers working in conjunction with the Ministry of Housing, Communities & Local Government (MHCLG). This collaborative project has proven a great success, upskilling a much-needed workforce for parks across the U.K.

We firmly believe that we are well placed to work with government to increase interest and growth in the designated landscapes sector. If a new National Park Service is to be created it will need to be staffed with professionals with the right skills to carry out the recommendations of this report. This could be delivered in three key ways:

- We would wish to work closely with government to explore funding for skills, training & Continuing Professional Development (CPD) to help create programmes for professionals in any new National Landscape Service.
- With a major skills shortage in our sector, we are keen to discuss how our new landscape apprenticeships (on track to start in 2020) could help supply skilled professionals for designated landscape management.
- Promoting careers in designated landscape management is vital if we are to reach diverse communities and create a new generation equipped with the skills to tackle pressing concerns in climate change mitigation and safeguarding and enhancing natural capital provision. We would like to explore whether a bursary scheme could be started by DEFRA similar to an arrangement that supports the planning sector developed by MHCLG.

Full response

1. The designation of outstanding landscapes has proved to be a success story. Designation is a valuable policy tool, to protect and enhance landscapes, and to achieve a range of other beneficial outcomes. These landscapes retain great support from the public, and their administrative bodies are frequently doing excellent work with very limited resources or powers. This review is an opportunity to celebrate that.
2. However, this review also provides an overdue opportunity for some minor reform: to ensure the original aims of designation are being met, and to maximise public benefit.
3. For the purposes of this response, we have limited ourselves to commenting upon those areas which we believe can/should be improved. Because we are delighted to see that the 'positives' of the current system are recognised in the report, we have not focussed upon all the many ways in which National Parks and AONBs¹ are succeeding, or the tools and functions which are working well without reform. Likewise, whilst there are many minor ways in which the administration of designated landscapes, and their interrelation with other public bodies, can be tweaked or improved, we have limited our input to changes which require central government intervention or significant policy change. There are also sections that we are unable to comment on due to lack of sector expertise.

¹ Note: when referring to National Parks or AONBs, we are referring to the landscapes themselves, not to the administration bodies – unless clearly identified.

Landscapes Alive for Nature and Beauty

Proposal 1: National landscapes should have a renewed mission to recover and enhance nature, and be supported and held to account for delivery by a new National Landscapes Service

In our initial response we highlighted the role landscapes could play in delivering social and environmental benefits. It is commendable that this is a key recommendation of the report, it is vital that the robust improvement of natural capital assets within these landscapes is a focus going forward. We see an opportunity to rectify this omission in the emerging Environment Act.

Our response was clear that there was a duplication of services and benefits offered by both AONBs and National Parks. The establishment of a National Landscape Service could ease these issues as well as better solidifying the vital public and natural services AONBs provide. Oversight could potentially facilitate much stronger monitoring of, and reporting upon, the outcomes delivered by national landscapes cooperatively.

Proposal 2: The state of nature and natural capital in our national landscapes should be regularly and robustly assessed, informing the priorities for action

Our national landscapes undoubtedly provide multiple benefits, but the mapping of this value requires significant attention. We are pleased that there is a proposed push to assess and account the natural capital within our landscapes. In our initial response to the review we were eager to realise the full potential of *all* our landscapes and hope that this action can provide this.

There is a concern among our wider membership about the state of our nation's soils and we hope that there will be an ambition in the calculation to appreciate and recover the microbial value of our soil, the very essence of our landscapes.

Proposal 3: Strengthened Management Plans should set clear priorities and actions for nature recovery including, but not limited to, wilder areas and the response to climate change (notably tree planting and peatland restoration).

We were clear in our initial response that Management Plans can play a key role in supporting not only National Parks but AONBs in delivering nature recovery schemes and mitigating climate change. It is pleasing that this key mechanism for delivery will be strengthened.

It will be important for these plans to be cemented in legal and statutory terms. National Park/AONB Management Plans should be the primary strategic articulation of land management goals for that area, and public bodies should be legally obliged to work towards their delivery through their interventions.

Proposal 4: National landscapes should form the backbone of Nature Recovery Networks – joining things up within and beyond their boundaries

National Parks and AONBs certainly have the potential to become essential parts of a Nature Recovery Network. This network would put space for nature at the heart of our farming and planning systems; and brings nature into the places where people live. Nature Recovery Network Mapping would guide the restoration and creation of habitats within and adjacent to National Parks and AONBs to enable a connected landscape, as well as ensuring essential habitat connectivity improvements are implemented within the wider countryside.

Proposal 5: A central place for national landscapes in new Environmental Land Management Schemes

The recognition of the importance of the new Environmental Land Management Schemes (ELMS) is commendable. The potential future shift in environmental land management is monumental, integrating national landscapes into these schemes will be key to secure funding and support. Our national landscapes can play a key role in delivering the public goods of any future Environmental Land Management Scheme.

We highlighted the role Management Plans can play providing a framework for determining strategic priorities and funding decisions for any area of land: especially (but not only) investment made under new Environmental Land Management Schemes.

Proposal 6: A strengthened place for national landscapes in the planning system with AONBs given statutory consultee status, encouragement to develop local plans and changes to the National Planning Policy Framework

We agree wholeheartedly with the move to give AONBS statutory consultee status and encourage their engagement in the planning process. As AONB landscapes frequently deliver a similar public offer, and are sometimes greater in size than National Parks, there is a clear need to nuance this arrangement. We would anticipate that giving a stronger voice to AONB bodies in major planning decisions and plan-making will lead to more proactive and positive development management within AONB areas.

Working on bespoke local plans and planning frameworks has been recognised in the final report, this flexibility and dynamism is vital. For some larger AONBs, a stronger partnership with the Local Planning Authority would benefit both parties, for instance through the publication of Joint Local Plans or an extended Duty to Cooperate. Conversely, there are

some smaller AONBs, for whom this level of responsibility (and the associated resources) may not be appropriate. In these instances, a solution may be the creation of Supplementary Planning Documents, bespoke to the AONB area, to ensure that landscape priorities are upheld through the planning system. For example, the report highlighted the recent joint venture between Natural England and Lancaster City/South Lakeland District Council to produce a Development Plan Document for Arnsdale & Silverdale AONB. This approach is commended and should be evaluated as a potential future model.

More emphasis is needed to make realistic and workable changes to the National Planning Policy Framework.

Whilst acknowledging that revisions to primary planning legislation and the NPPF are unlikely to be forthcoming in the foreseeable future, we do see the need for Defra to promote realistic and workable changes in emphasis within the planning system, via the emerging Environment Act. In some cases NPPF already provides the policies to support the Glover findings. For example, we note that NPPF para 78 already provides opportunities for planning authorities to support rural developments for housing and employment purposes - *"To promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. Planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services. Where there are groups of smaller settlements, development in one village may support services in a village nearby."* Paragraph 83 seeks to support a prosperous rural economy.

Our main concerns relate to the interpretation and application of NPPF paragraph 172 - *"Great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to these issues"*. In this context it seems to us that many local planning authorities have done more to "protect" landscapes than to enhance them, and have perhaps been over-zealous in refusing planning permissions for new development, without fully considering the impacts of doing so on local communities. Even NPPF paragraph 172 allows for major developments in exceptional circumstances *"where it can be demonstrated that the development is in the public interest."*

We therefore share Glover's concerns about the operation of the planning system in designated landscapes and suggest that current inconsistencies could be successfully addressed by the proposed National Landscapes Service. Glover's findings that current NPA and AONB Boards are un-representative of their constituent communities add to our call for an overhaul of the way the statutory planning system is being applied in these areas.

Living in Landscapes

Our profession is always driving to make landscapes liveable, healthy and inclusive. We all agree that our national landscapes have a long and cherished history of being used, lived and worked in and enjoyed by visitors. We as a profession must do more to safeguard the future of the livelihoods that support the regeneration of neglected landscapes, and we are therefore very supportive of the breadth of vision within the report.

Proposal 17: National landscapes working for vibrant communities

We strongly support the proposal to strengthen the "*existing duty required of National Parks, to seek to foster the social and economic wellbeing of local communities in their area*", and to make this a third statutory purpose "*which should then apply to all national landscapes not just National Parks*". Amending the fundamental purposes of designated landscapes, to give equal weight to the wellbeing of the people who live and work in these communities, will play a major part in shifting the 'weight' to be given, in planning decisions, to the social and eco-system benefits supplied by these landscapes. Incorporating these fundamental purposes into every area's Local Plan and Management Plan will drive the planning process forward to deliver Glover's 'headline' aim - making national landscapes "*happier, healthier, greener, more beautiful and open to everyone.*"

Proposal 18: A new National Landscapes Housing Association to build affordable homes

The need for affordable housing is particularly acute in our national parks and AONBs. Forming a 'bespoke' housing association dedicated to navigating the difficult intersection of planning concerns and dwindling supply will be an important first step to remedying these problems.

The measures for which this new association is measured need to be nuanced with the right incentives. Government should review the system of incentives for encouraging positive development within National Parks, to ensure that it is fit for purpose. These incentives should not be tied simply to 'number of new houses' within National Parks, but aligned with NPPF requirements that sustainable and sensitively-designed development is essential.

Too often our membership sees development being 'done to' residents rather than with, we agree that the local voice should be heard and housing built that is appropriate for the area. We have a vision of creating 'homes not houses' and creating with 'good' design in mind. As a body we have worked on a number of guidance documents for developers and local authorities, to encourage them to adopt 'landscape-led development' principles.

For example, in 2014, our Profitable Places guide laid out how the landscape is an essential part of what makes a place successful and developers who lead with a detailed analysis of local landscape context and character often create the best-designed homes. In our

National Parks and AONBS in particular, considering landscape from the outset can ensure that new development will be more acceptable to existing communities. We hope to work closely with both National Parks, AONBs and other concerned institutions on promoting this ethos.

“Place comes before architecture, and landscape plays a big role in place.”

Wayne Hemingway MBE, Design Council CABE

Proposal 19: A new approach to coordinating public transport piloted in the Lake District, and new, more sustainable ways of accessing national landscapes

Access and transport are vital factors in making a place healthy, liveable and sustainable. The measures promoted in the final report are a positive step in the right direction.

Gridlocked, car-filled roads annoy everyone, particularly local business people, farmers and service providers. The solutions are seemingly obvious, i.e. an increase in public transport provision specifically aimed at taking visitor's cars off the roads. However, there are noted issues with this approach. In our view national landscapes need smarter policies than simple increases in rural buses.

We would like to see national park authorities and AONB bodies play a more active role in improving the provision of sustainable transport options in the rural areas. We are also calling for “smarter travel” pilots to test joined-up sustainable transport choices, as well as increasing the information available to visitors about existing options for car-free access, including actively promoting and updating any existing disabled access and sustainable travel guides.

More Special Places

The ambition shown in this section is very welcome, several measures which were in our initial response are highlighted in the final report. The recognition of urban landscapes within this report is an important step forward and we would be interested in working together with other interested parties to expand upon the idea of a city park competition. Creating landscapes we can be proud of, and that deliver public goods on most people's doorsteps, is something that all our members strive towards.

We consider that it is very important to recognise that designated landscapes are not the only landscapes in the UK that have value, and there are many managed landscapes which

do not enjoy the benefits of designation: regional parks, urban parks, heritage parks and gardens, urban landscapes, coastal landscapes, seascapes, “valued landscapes” under paragraph 170 of NPPF19, etc. The European Landscape Convention, to which the UK is a signatory, and to which we will remain a signatory after Brexit, is clear that all landscapes have value, and that those values should be protected and enhanced.

At the moment, no national process exists through which an area of land could be designated in order to receive enhancement – through proactive investment, management and development – and become a future AONB (for instance). Now could be an opportunity to create that route.

In the report there appears to be a further call for evidence about how to fix the designation review process. We suggest that there could be an intermediate stage in the designation process (e.g. “National Landscape/Park Designate”) which would identify landscapes that do not currently meet designation criteria, but which have the potential to do so in the future. This could open the door for positive changes and funding to drive the landscapes in question to a designated status.

New Ways of Working

Proposal 23: Stronger purposes in law for our national landscapes

In our initial response, we were clear that AONBs, with their often-identical contributions to public goods, need equal status to National Parks in purpose and law. We are pleased that this has been recognised with the drive to strengthen the legal protection for all landscapes. The three principles by which these landscapes will be guided are an effective outline of what these bodies should be working towards at present, and what the National Landscapes Service should be guided towards in future. The reintroduction of an updated ‘Sandford Principle’ is timely. Conservation interests are meant to take priority over public enjoyment, but very regrettably, as the report ably demonstrates, the preservation and enhancement of natural beauty (and the habitats of ground-nesting birds and other protected species) has often been overshadowed by private recreational activities such as grouse shooting and ‘jeep safaris’.

Proposal 24: AONBs strengthened with new purposes, powers and resources, renamed as National Landscapes

Our membership wholeheartedly supports this conclusion, that statutory purposes should be aligned across all designated landscapes, and that AONB bodies should be given statutory consultee status to strengthen their role in the planning system. We believe that this should be a priority recommendation for implementation. Planning decisions that may contribute

to landscape degradation are very often being made by local planning authorities, without any input from AONB bodies.

Proposal 25: A new National Landscapes Service bringing our 44 national landscapes together to achieve more than the sum of their parts

The Landscape Institute strongly supports all the aspirations for a new National Landscapes Service, as itemised in Proposal 25. We particularly commend the proposal for this service to be given sufficient authority so as to properly represent all the designated landscape bodies "with a single strong voice" to government via Defra. The report includes a very strong 'ask' where it stresses that "*the overriding priority of the National Landscapes Service is to support the national landscapes to be more ambitious, more action-focused and more collaborative*". We will robustly support that important and timely 'ask' of government.

Proposal 26: Reformed governance to inspire and secure ambition in our national landscapes and better reflect society

The changes proposed to the individual boards of our national landscapes are vital. The new system which will create a partnership group alongside a streamlined board will hopefully increase the output of stronger management plans which contain strong commitments to enhance these landscapes for people and nature. The step to improve inclusivity of these groups is important; for too long they have represented a narrow section of society.