

MALVERN HILLS AONB JOINT ADVISORY COMMITTEE 7 DECEMBER 2018

THE NATIONAL REVIEW OF NATIONAL PARKS AND AONBS. EVIDENCE FROM THE MALVERN HILLS AONB JOINT ADVISORY COMMITTEE - *DRAFT AT 23rd NOVEMBER 2018*

Recommendation

- 1. The Committee is requested to:**
 - a) Discuss the draft text provided at Appendix 1 and agree any amendments or additions needed.**
 - b) Agree whether any further changes required can be actioned by the AONB Partnership Manager prior to the text being submitted to Defra.**

Background

2. A commitment to a national review of National Parks and AONBs is contained in the Government's 25 year Environment Plan which was launched in January 2018. In May 2018 Environment Secretary Michael Gove launched that review. This comes nearly 70 years after the country's first National Parks and AONBs were established, opening up the countryside and allowing more people to connect with nature.
3. The purpose of the review is to look at how these iconic, designated landscapes meet people's needs in the 21st century – including whether there is scope for the current network of 34 AONBs and 10 National Parks to expand. The government has stressed that the review will be a positive one. Weakening or undermining the existing protections or geographic scope of National Parks and AONBs will not be part of the review, which will instead focus on how designated areas can boost wildlife, support the recovery of natural habitats and connect more people with nature.
4. The review is being conducted by an independent panel led by writer and journalist Julian Glover. The terms of reference for the review are available at: <https://www.gov.uk/government/publications/designated-landscapes-national-parks-and-aonbs-2018-review/terms-of-reference> and are also available as Appendix 1 to this paper.
5. On Saturday 20 October Defra launched a formal call for evidence as part of the review. The AONB Unit circulated that call for evidence to a very wide range of partners across the Malvern Hills AONB. It is obviously important that all interests in the area have an opportunity to make their views known. However, it is also important that the JAC, as the formal voice of the Partnership, makes its own response. A draft submission, for consideration by the JAC, is presented below.

6. The draft takes the form of responses to the key questions posed by Government in its call for evidence. In drafting this response, the AONB Unit Manager has been cognisant of national messages which the family of AONBs feel is important to communicate as well as local messages which are particularly relevant to this AONB. Some areas of the review are likely to be of greater interest to the JAC than to others. It is important to stress that a response from the JAC is exactly that, a response from the advisory committee that coordinates the management of the AONB and the implementation of the AONB management plan. The response is not submitted on behalf of the organisations that are represented by committee members and therefore it is suggested that formal approval beyond the committee is not required. All partner bodies have their own opportunity to respond to the call for evidence.

The draft response

Please see Appendix 1.

Supporting Information

- Appendix 2 – Terms of Reference for the Glover Review of National Parks and AONBs.

Appendix 1 - The questions and responses

(Qs 1-5 are about the respondent. Q6 invites a recent picture which sums up what is special to you about our designated landscapes).

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 through legislation and national and local policies and plans. 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 which many others do not. They recognise their designated areas as living and working landscapes. There is a huge wealth of knowledge in the organisations overseeing these areas.

AONB Partnerships work effectively to bring together and represent many different voices and by working collaboratively the small teams that support these partnerships achieve a lot with relatively few resources. We are often described as 'punching above our weight.' We help bring other parties together to co-ordinate and reduce potential conflict.

AONB Partnership staff teams are well established and well-grounded in their local areas. This enables them to develop relationships with key partners such as landowners which are deep-rooted, meaningful and, crucially, which are based on trust. The fact that AONB organisations are at least one step removed from regulatory authorities means that some individuals may find us easier or 'safer' to approach and to work with. For these reasons AONB organisations can find it easier to get things done and to make the difference that many parties wish to see.

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.

Whilst AONB Partnerships achieve much with relatively little our ambitions and aspirations are constrained in many ways. The partnership approach is the correct one but practical changes are needed if we are to achieve designated landscapes for the 21st century which meet increasingly complex challenges and which deliver for people and nature in multifarious ways.

AONB purposes. Government recognises that the landscapes of AONBs and National Parks are equal in value. It is also obvious that AONBs are as vital as National Parks in delivering for nature, the historic environment and for people's recreation and access (and health needs). Indeed, the proximity of AONBs to many large centres of population means that they are in often in very high demand by people, for example, it is estimated that 1.25 million visits are made to the Malvern Hills each year. AONB Partnerships help to meet and manage these demands, for example, by providing and promoting opportunities for outdoor recreation and

enjoyment. We believe it is time for the formal purposes of National Parks and AONBs to be aligned to reflect the reality of what these areas provide and what the organisations that oversee them do. This alignment should include:

- A primary purpose for both National Parks and AONBS to conserve and enhance natural beauty, wildlife and cultural heritage (currently the term ‘wildlife and cultural heritage’ does not apply to the AONB purpose).
- A second statutory purpose for AONBs to promote opportunities for understanding and enjoyment of the special qualities of the area.

Governance. The hosting of AONB Partnership teams by Local Authorities is a great strength in many ways. It helps to ensure that the Partnership is locally accountable and helps to bind some of our most important partners to the AONB cause. Whilst we would not wish to change this basic model it is clear that the approach is creaking, principally but not entirely as a result of shrinking resources (see resources section).

We believe there needs to be a stronger appreciation, through governance, of the fact that AONBs have national status. One way in which this could be achieved is through national appointees on AONB Partnerships (as happens with National Park Authorities and AONB Conservation Boards). Improved terms of reference for members of AONB Partnerships could also be considered. Engendering a closer relationship/accountability between AONB Partnership staff teams and the Partnerships themselves should also be considered since currently this can seem like a rather stilted relationship at times. In saying this it is recognised that such a relationship would be likely to make additional demands on both staff teams and Partnerships themselves (see section on resources again).

One of the great strengths of the AONB family is the ability for staff teams and individual members of staff teams to collaborate with AONB colleagues from other parts of the country and to learn from their experiences, leading to greater efficiencies, more knowledgeable staff and better results on the ground. Improving access to this sort of support, and ensuring that those in the AONB family have the time and capacity to provide and benefit from this support is seen as vital.

Resourcing. The Malvern Hills AONB Partnership is, of course, very aware of the pressure which the public finances have been under since the financial crash of 2008. Nevertheless, we do feel it is important for Government to align resourcing of AONB Partnerships to a clear assessment of statutory purposes and a clear understanding of what it is that Government expects AONBs and AONB Partnerships to deliver. For example, within the Malvern Hills AONB we have placed considerable emphasis on monitoring the condition of the AONB since we believe that our work as a partnership should be evidence-based and tied to a clear understanding of what is happening on the ground. However, we have had to allocate significant resources both to establishing a monitoring baseline and updating this picture and even so we are aware that there is so much more than could be done. If, for example, government wants our work to be evidence-based, resourcing should reflect this, including the resourcing of the Monitoring Environmental Outcomes in Protected Landscape group who have helped to provide valuable evidence in recent years. Town and Country planning through Partnership teams is another area of activity that we feel must be adequately resourced, especially if AONB Partnerships are given a statutory responsibility – see below.

The current financial settlement from Defra to AONB organisations, linked to inflation, has been warmly welcomed. However, it is undeniable that a decade or so of extreme constraint in the public sector has had an impact on the work of AONB Partnerships. Even in the Malvern Hills AONB where local authorities have worked hard to hold the line in match-funding it is estimated that funding from local authorities to the Partnership reduced by some 23% in real terms between 2008 and 2018.

Whilst this has not happened here we are aware that shrinking resources to local authorities can put AONBs teams in a precarious and vulnerable position with regards to their host authorities. This needs to be addressed to ensure that AONB Partnerships are on a surer footing in the future. One suggestion is for five year funding packages to be agreed with government, based on clear and agreed outcomes. Attempts to help meet the shortfall by bringing in income from other sources and selling services can be a significant distraction for Partnership teams, taking valuable staff time away from the delivery of core purposes whilst often returning little in a very competitive market place.

The Malvern Hills AONB Partnership has worked hard over the years to maintain a Sustainable Development Fund (SDF) from the single pot funding which comes from Defra. This has enabled us to support a dozen or so projects each year over the last decade, demonstrating our worth to many communities and key partners, achieving change on the ground, raising awareness, building and strengthening the Partnership and bringing in valuable match funding. We believe strongly that a dedicated SDF should be provided to help stimulate and achieve change in both AONBs and National Parks in the future.

Planning

It has been clear for very many years that one of the most important functions delivered by AONB Partnership teams relates to their work on development. This work can take many forms. In the Malvern Hills AONB we have put great store on influencing the policy framework of emerging local plans, producing guidance to help achieve the right sort of development in the right place, collaborating with and supporting local communities to produce landscape-led Neighbourhood Development Plans and engaging in planning applications with a view to ensuring that new development reflects the special character of the AONB. Above and beyond the benefit of such work to the landscape, it is clear that this sort of effort is key to why local communities value the AONB Partnership so highly.

However, whilst public bodies are often supportive of AONB purposes we are aware that they do not always give the AONB the weight which we believe it deserves when it comes to individual decisions. There is evidence for this in annual planning reports produced by the Malvern Hills AONB Partnership. There are likely to be various different reasons for this, ranging from high individual officer case-loads to the multiple factors that must be weighed in the balance when making decisions and the relative priorities which are attributed to those factors. We believe that the situation could be improved by the following:

- strengthening the Duty of Regard under Section 85 of the Countryside and Rights of Way Act – which is weak in reality - for example through its replacement with a duty of due regard;
- a raising of the profile of the Duty of Due Regard;
- an amendment to the legislation which requires relevant authorities to implement AONB management plans (not simply to review/produce them, as is the case now);
- give AONB Partnerships statutory consultee status for Town and Country Planning matters (under Article 18, Schedule 4 of the Development Management Procedure Order);
- an ability for Designated Landscapes Management Organisations to ‘call in’ specific cases for scrutiny; and
- government monitoring of Planning Authorities’ performance in Designated landscapes.

A key threat to this AONB, like so many others, is the cumulative negative effects that arise from small scale changes which the planning system is often unable to influence. One example is the replacement of distinctive boundary features including Malvern stone walls and sections of native hedgerow with ubiquitous close board fencing. Such activity undeniably erodes character and sense of place in the local area but is classed as permitted development (within certain parameters) and as such is something which neither the Partnership nor LPAs can influence. The only recourse seems to be to an Article 4 Direction under the General permitted Development Order which, unsurprisingly, is not a mechanism which LPAs appear to want to explore, requiring as it does Secretary of State consideration/approval. We urge the review to explore how such small-scale changes which bring larger, long-term consequences can be addressed.

Most of these key points of our response above are elaborated in answers to the questions below.

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

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

The evidence for a loss of biodiversity in England is compelling and it seems equally clear that solutions to arresting this decline lie to a significant extent in a landscape-scale approach in which various partners collaborate to improve the conditions under which wildlife can thrive. AONB Partnerships seem almost uniquely well placed to facilitate such collaborative working across large areas. They clearly have a fundamental role to play.

There are numerous projects and initiatives from this AONB which provide evidence of this approach, including with regard to the conservation of traditional orchards, road verges and water course management. Key partners involved are numerous and varied, ranging from Highway Authorities to individual landowners and local community groups. In the last 12 months the Malvern Hills AONB Partnership has

successfully applied for funding to establish a Countryside Stewardship Facilitation Fund in the area and to commence a project working with local people and landowners to improve our knowledge of the distribution of rare species in the northern part of the AONB. The decision by the IUCN to recognise AONBs as Category V protected landscapes followed an assessment is a formal recognition of the role that they play in providing for nature conservation.

It is important to stress that the Malvern Hills AONB Partnership staff team does not have the range of biological and ecological expertise which would be needed to deliver change for biodiversity across many different fronts. However, we do have the skills and mechanism to bring such expertise together from a range of partners, whilst also recognising and adapting to social and economic factors which also need to be considered in decision making for nature conservation and sustainable land management. As mentioned previously, the positive and established relationships which the Partnership has with landowners are fundamental to improving the landscape for wildlife.

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

Through their many different activities AONB Partnerships have a crucial role to play in shaping landscape and scenic beauty and we are often seen, in conjunction with partners, as a key part of the machinery for protecting beauty. This is achieved in many different ways, for example by arguing against inappropriate development, by helping to ensure that the right development occurs in the right place and by actively supporting, funding and facilitating community or business initiatives which conserve and exemplify natural beauty.

At a time of great change being brought about by various domestic and national policies the AONB partnership has a crucial role to play in helping people to understand that landscape is dynamic and that change is both necessary and inevitable. Traditional notions of scenic beauty can major on visual perceptions and AONB Partnerships have a role to play in elucidating a deeper, multi layered understanding of natural beauty which arises from the actions and interactions of human and natural processes. Again, broad-based AONB Partnerships, with landscape professionals in their teams, are very well-placed to lead the way.

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 externally funded projects that have included considerable work on heritage 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 desirable.

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 activities of farmers and land managers underpin the natural beauty of the Malvern Hills AONB. Working with these interests is key to securing natural beauty for

the future. The AONB Partnership team works hard to establish and maintain meaningful relationships with landowners and managers, both on the ground and in terms of representation on the JAC. We have recently established a Countryside Stewardship Facilitation Fund in one part of the AONB in order to further explore how activities can help to meet land manager needs as well as delivering for natural beauty.

The Partnership is very aware that there are many different organisations and agencies involved in working with farmers in the AONB and we do believe there is scope for streamlining in this area. Since AONB Management Plans set out a holistic vision, objectives and policies for these designated landscapes, underpinned by extensive local consultation, it seems sensible that these plans should play a role in setting the framework for the delivery of the new Environmental Land Management Schemes (NELMs) in the future. Whilst the AONB Partnership staff team is currently too small to deliver them we would also be interested in the possibility of playing a key role in the delivery of NELMs in the future. In our opinion the success of such schemes is often linked to tried and tested advisors on the ground and the established and respected teams that exist in AONB Partnerships could be a home for such advisors. However, the AONB Partnership would be reticent to take on regulatory or enforcement roles since these could harm the relationships which we have established with landowners.

There is an undeniable tension in certain AONBs, including in parts of the Malvern Hills, between certain activities which are seen by farmers and land managers as necessary parts of development/diversification in a changing world and the conservation and enhancement of natural beauty. In the course of commenting on planning applications from the point of view of our statutory purpose we sometimes object to applications by farmers, such as for large scale intensive livestock buildings or polytunnel developments. We are aware that this consultation role can affect our relationships and reinforce perceptions of some farmers that the AONB designation is a constraint. 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 hindrance. 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. Through our AONB guidance, for example, that related to Environmental Colour Assessment, we try to lead the way in providing solutions by demonstrating how new development such as some large agricultural buildings can be better integrated into the special landscapes of the AONB.

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

Whilst the AONB Partnership does not own or manage any land we do endeavour to provide a strategic lead to this activity through the AONB Management Plan, whilst also working with partners to help address the challenges, issues and opportunities set out in that plan. In recent times we have worked with major landowners in the area to better understand the recreational use of the Malvern Hills through visitor survey and financially supported an initiative to clarify and promote user rights and to minimise recreational conflicts. We often provide support for new countryside

information and interpretation, including through electronic media, and publish many guides that are valued locally by users and businesses alike. We take an active role with recreation and tourism as these are important to our area, and it would be desirable for this to be recognised in AONB purposes, as mentioned above.

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

Many people are extremely proud to live and work in one of the country's most cherished landscapes. Overwhelmingly people recognise its beauty and its value and wish to maintain this. However, not everyone benefits from the designation in the same way and inevitably some do regret the perceived additional constraints and perhaps the levels of use and associated issues that may be associated with such an attractive and designated landscape. We aim to be positive towards sustainable development and to support business where we can, including through the provision of some grant assistance. We recognise that we could be more proactive on this front in the Malvern Hills AONB but are limited by resource constraints. We are driven by our statutory purposes and as such do not feel able to support business development opportunities where these are contrary to the conservation and enhancement of natural beauty.

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

The Malvern Hills AONB covers a relatively small area and is fringed by two towns – Malvern and Ledbury. These towns provide the focus for new housing to meet government targets and thus far significant new development in the AONB has been limited thanks to central and local government policy. The AONB Partnership team uses some of its resources and its relationships with partners to try and ensure that the approach to development in the AONB is landscape led. For example, we have used resources to promote and to help finance and manage Landscape Sensitivity and Capacity Assessments (LSCA) in four parish council areas, to help these Councils to meet housing targets allocated to them by allocating development to those sites with least sensitivity/highest capacity.

Being fringed by two towns and with extensive views from the high ground of the AONB to undesignated, lower lying land beyond, we are particularly concerned by the pressures for new housing and other development in the areas adjoining the AONB, which are very clearly in its 'setting'. Such development, if not controlled, properly directed and delivered, can impact on the special landscapes of the AONB and on the enjoyment of the natural beauty and scenery which people value so highly when in the area (a recently completed visitor survey revealed very clearly that the extraordinary views from the Hills were top of the list when people were asked what they liked best about the AONB). In the absence of national policy that helps to protect the setting of the AONB we do our best to influence the position and design of new development outside the AONB, for example through current work with Malvern Hills District Council on an LSCA for the Malvern Hills environs and through the application of ECA techniques. However, our resources are limited, as are our levels of influence outside

the AONB and the Partnership believes that a strong planning policy helping to safeguard the AONB setting is required at a national level.

We recognise that traffic has an important impact on levels of tranquillity in the AONB and on the quality of recreational experiences that people enjoy, for example amongst horse riders and cyclists using the minor road network. We comment on the traffic implications arising from developments both inside and outside the AONB where we judge such impacts to be significant. For example, a proposal for a major residential development in one of the towns adjoining the AONB may lead to a significant increase in traffic on the minor road network in parts of the AONB and so we are seeking to help achieve on site solutions which will minimise such effects.

We have produced a highway design guide and work regularly with highway authorities in the area to help ensure that new traffic management schemes, for example, respect the local character of the area. Historically we helped to support a local Hills Hoper bus service through the AONB at weekends and bank holidays but this has gone the way of so many other rural bus services, leaving a shortage of provision in the area. We are currently exploring whether a Community Transport pilot could help to meet the shortfall in service for those who wish to access key heritage sites in the AONB but, without their own transport, are unable to do so.

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 has considerable strength but is also vulnerable to change, driven by lack of resources and/or changing political priorities in local authorities. Whilst it has not occurred in this AONB there is a concern that the lack of independence could lead to a major problem if the Partnership were to object to a significant new development in or affecting the AONB which is supported by a local LPA. However, on balance the current partnership based model of governance has much to commend it.

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.

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. As mentioned earlier, the family approach which underpins AONB working yields benefits from sharing experiences, advice and, sometimes, resources.

The Malvern Hills AONB shares planning consultants with the Wye Valley AONB. Neither partnership team has the resources or level of planning work to justify the employment of a planning officer but through collaboration we offer a quantum of work

which attracts the interest of planning professionals. Through joint commissioning we minimise procurement effort and contract administration.

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?

Work targeted specifically at including under-represented sections of society can be very effective, but labour intensive. Our AONB Partnership has undertaken a limited amount of this kind of activity, for example, engaging those with limited abilities in learning about and managing traditional orchards. We have also provided grant support to the local branch of the National Childbirth Trust to encourage new mothers (and fathers) to exercise on the hills with their charges and have worked with a local business to enable those with restricted mobility to access nature and the fantastic views from the top of the Malvern Hills via a motorised buggy. There is great potential to do more to involve others if resources allow.

Volunteering – we have done very little work with volunteers compared to some other AONB partnerships. This is mainly because a key landowner and conservation charity at the heart of the AONB does a lot of work with volunteers and we are fearful of standing on their toes and diverting volunteer effort away from good causes. However, a Malvern Hills AONB Partnership initiative to engage volunteers in caring for local geological sites (led by our local Earth Heritage Trust) has proved highly successful in reversing the declining condition of those sites which was identified five years ago. This is excellent evidence of how effective volunteers can be in helping to improve the condition of the AONB whilst bringing multifarious benefits to the individuals involved.

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 special landscapes which are hugely popular and which deliver huge benefits in terms of physical and mental health. However, we are now taking steps to begin to quantify the value of the AONB to people's health and well-being. We are represented on the local Health and Wellbeing Partnership and are seeing this involvement bear fruit, for example, through the identification and delivery of new projects working with a new range of partners who are closely attuned to the health and wellbeing agenda. We see enormous scope for the expansion of such activities but again our capacity for achieving this through existing funding is very limited. In addition, at present it seems hard to tap into health budgets for small social prescribing.

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

Reductions in local authority funding have been mentioned above. Given the very small size of AONB Partnership teams such as that in the Malvern Hills (2.6 fte) a diversion of staff time onto a search for alternative funding is a major and often fairly fruitless distraction from core activities. This is especially the case given the lack of fund-raising expertise in the team, the highly competitive market place and the fact that our public funding makes us less attractive to donors compared with charities. It is recognised that many AONB partnerships have established charitable arms but the

above points still apply and such an option is difficult because of the presence of a conservation charity occupying a central place in this AONB.

We believe strongly that reliable and secure funding from government is essential to the maintenance of effective AONB Partnership teams and AONB Partnerships. Such funding allows us to focus on a clear direction and the delivery of the AONB Management Plan in a way that would not be possible in its absence. It is vital that local authorities continue to contribute financially and therefore to buy-in and have ownership of the work of the Partnership. While insecurity of funding from local authorities remains a key issue we support a retention of the model including local authority funding.

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

We have no direct experience of the process of designation. Anecdotally we hear that boundary review and extension is time consuming and that resources to respond to local requests are very limited at a national level. The focus of the Malvern Hills AONB Partnership is on the Malvern Hills AONB. However, we have been approached about the possibility of an expansion of the AONB, particularly to the north where, prima facie, landscape quality and condition appears to be high and where a good case for AONB designation could probably be made. If the process of altering boundaries were eased and if the case was made, there would be interest in considering potential boundary changes, provided commensurate resources were made available in the future to oversee an expanded AONB.

In the mean time we work outwith the AONB boundary on a number of projects and initiatives where doing so helps also to conserve and enhance the AONB and people's enjoyment of it.

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

The Malvern Hills AONB Partnership has never discussed this subject and has no comments to make here.

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

The Malvern Hills AONB Partnership has never discussed this subject and leaves it to others with more experience of such designations to respond to this question.

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. While we do not think re-branding

alone is a high priority, in combination with a desirable update in the language of the purposes of designation, a new title could really help to boost public understanding and recognition of AONBs. One solution would be for all AONBs to become National Parks. Alternatively, a title could major on the word Landscape. 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 National Landscape' or 'National Landscape'.

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. We do not believe there is anything institutional required to make these relationships work, liaison between staff is the main requirement.

Appendix 2 - Terms of reference for the Glover Review of National Parks and AONBs (taken from <https://www.gov.uk/government/publications/designated-landscapes-national-parks-and-aonbs-2018-review/terms-of-reference>)

1. Introduction

In January 2018 the government published a [25-Year Plan for the Environment](#). It set out an approach to protect landscapes and habitats in England and committed to undertaking a review National Parks and Areas of Outstanding Natural Beauty (AONBs).

The publication of these terms of reference to guide that review is the next step.

At the outset, it is important to state one thing the review will not do: propose reductions in either the geographic extent or the protections given to England's designated landscapes.

The review aims not to diminish the character or independence of our designated landscapes, or to impose new burdens on them and the people who live and work in the areas they cover. Instead, its purpose is to ask what might be done better, what changes could assist them, and whether definitions and systems - which in many cases date back to their original creation - are still sufficient.

2. Scope

The review will consider National Parks and AONBs in England, including the role of these areas in relation to other places designated for environmental purposes. Landscapes in Wales and Scotland are under devolved administrations and therefore do not fall under the scope of this review.

The review will respect the cultural and visual heritage of people, farms and businesses in National Parks and Areas of Outstanding Natural Beauty.

3. Objectives

In the context of meeting both local and national priorities and wider environmental governance, the review will examine and make recommendations on:

- the existing statutory purposes for National Parks and AONBs and how effectively they are being met
- the alignment of these purposes with the goals set out in the 25-Year Plan for the Environment
- the case for extension or creation of new designated areas
- how to improve individual and collective governance of National Parks and AONBs, and how that governance interacts with other national assets
- the financing of National Parks and AONBs

- how to enhance the environment and biodiversity in existing designations
- how to build on the existing eight-point plan for National Parks and to connect more people with the natural environment from all sections of society and improve health and wellbeing
- how well National Parks and AONBs support communities

Expanding on work already underway, the review will also take advice from Natural England on the process of designating National Parks and AONBs and extending boundary areas, with a view to improving and expediting the process.

4. Roles and responsibilities

The review will be led by Julian Glover and supported by an experienced advisory group. The [members of the group have been announced](#) as Lord Cameron of Dillington, Jim Dixon, Sarah Mukherjee, Dame Fiona Reynolds and Jake Fiennes. Nicola Blackwood served as a panel member from 15 June 2018 to 2 October 2018.

The review will draw on existing evidence and that submitted by interested groups and individuals during the course of the review. The review team will also visit people and places in a range of designated landscapes.

This is a cross-government review, with Defra providing the secretariat and appointing a lead to undertake the review.

Recommendations will be made to the government. Implementation will be led by the Defra Secretary of State.

5. Timing

The review will report in 2019 (the 70th Anniversary of the 1949 National Parks and Access to the Countryside Act).

This autumn we will be seeking views and evidence in a public call for evidence (likely to begin in October 2018). Further details will be published in due course.

6. Background

Our National Parks and Areas of Outstanding Natural Beauty are a great success. England is a more beautiful and more diverse place because previous generations took the care to campaign for their creation.

In 1945, the government set up a committee under Sir Arthur Hobhouse, who recommended that Britain establish national parks to preserve and enhance their natural beauty and provide recreational opportunities for all members of the public. In 1949, the National Parks and Access to the Countryside Act established these national parks, which the minister of the day described as “the most exciting Act of the post-war Parliament.” That legislation created a statutory framework for National Parks and AONBs. In brief, National Parks’ purposes are to conserve and enhance natural

beauty, wildlife and cultural heritage; and promote opportunities for the understanding and enjoyment of the special qualities of national parks. For AONBs, the primary purpose is to conserve and enhance the natural beauty of the area.

Now, as the oldest National Park approaches its 70th anniversary, comes a chance to renew this mission.

That is the context in which this review takes place.