



LANDSCAPES REVIEW

Response by Smart Growth UK

December 2018

Part 2 - Views

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

There are a wide range of concerns about threats to our national parks and AONBs, including energy developments. Smart Growth UK's primary focus, however, is planning, transport and community development and we campaign to protect the countryside from damaging development and against unsustainable transport. We are concerned, however, that the review is more orientated towards governance of protected landscapes than their protection.

High on the list of the latter concerns are recreational developments which are potentially some of the biggest threats to the conservation and tranquillity of national parks and AONBs. This is particularly the case with developments which involve a lot of traffic generation or whose intrinsic features would be seriously intrusive.

Plainly both national parks and AONBs play an important role in access to, and enjoyment of, the countryside. This should not, however, involve developments which significantly degrade the landscape, the natural capital or ecosystem services or which generate high volumes of traffic. There is obviously no single threshold test which can be applied; it depends on the individual circumstances, but intrusive or damaging developments and those which are major traffic generators should normally be refused.

This raises a particular issue in relation to the Sandford Principle which is enshrined in the Environment Act 1995. We fully support the Principle, but are concerned that it is not reflected in England's *National Planning Policy Framework*.

The *Framework* is extremely weak on protected areas, giving "great weight" to conserving and enhancing landscape and scenic beauty but merely rating conservation and

enhancement of wildlife and cultural heritage as “also important” and only affording them great weight in national parks and the Broads. So, in AONBs, it effectively says wildlife and cultural heritage should not receive “weight” of any kind in planning decisions. Whether this is just sloppy wording or deliberate, it needs to be reformed.

Paragraph 172, as currently drafted, appears to suggest that limits on the scale and extent of development is restricted only to national parks and the Broads and that includes the exceptional circumstances restriction on major development and the other considerations in paragraphs 172 (a), (b) and (c).

The whole of *NPPF* paragraph 172 needs redrafting to make clear the restrictions apply to AONBs as well and should also apply to heritage coasts as the existing paragraph 173 on heritage coasts is vague and weak.

Specific and explicit reference also needs to be made to the Sandford Principle here, making clear that, where there is a conflict between conservation and public enjoyment, then decisions should give greater weight to conservation. The Principle should also be applied in AONBs. National planning policy needs to make clear that major developments of any kind, including leisure, that generate substantial amounts of road traffic should normally be refused.

On the other hand, proposals to improve sustainable transport, particularly rail-based, need to be supported.

Part 3 - Current ways of working

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

An examination of the national parks and AONBs that have been designated in England reveals two bizarre and unsatisfactory aspects:-

1. The boundaries are not always “natural” ones, i.e. boundaries reflecting landscape, geological or developmental boundaries. Not infrequently, parts of what might be judged their natural area appear to have been excluded for reasons which have nothing to do with conservation.

For example, the northern boundary of the North Pennines AONB is set at a wholly arbitrary point and that appears to have come about for the now wholly obsolete reason that many of the areas to the north of it lay on potential opencast coal extraction sites. Virtually the whole area north of the existing AONB up to the A69 between Hallbankgate and Haltwhistle, up to the South Tyne River between Haltwhistle and Haydon Bridge, up to the A69 between Haydon Bridge and Hexham and up to the West Dipton Burn south of Hexham, as far east as the B6306, would and should have been included in the designation.

Much of Upper Weardale was also excluded from the North Pennines thanks to former industrial uses and large scale extractive industry. But the factories have closed and only

one quarry remains (ironically, within the AONB boundary). So the whole of Weardale east to the A68 should also be included.

There are numerous such cases around England's national parks and AONBs and a full and impartial audit of them is needed.

2. Areas which should be strong candidates for national park or AONB status have often been overlooked because of their proximity to other protected areas, presumably those judged to be of higher landscape value.

A non-exhaustive list of areas which should qualify for AONB status might look like this:-

- Yorkshire Wolds
- Salisbury Plain
- Eden Valley (Cumbria) south of Wetheral
- Northern central Northumberland (i.e. area between Northumberland NP and Northumberland Coast AONB north of Rothbury and Alnwick)
- Area between Exmoor and Dartmoor (roughly the Taw catchment between Barnstaple, Crediton and Okehampton)
- The Brontë Country (the Pennines between the Peak and Dales national parks)
- The Forest of Dean

Several of these appear to have been excluded solely thanks to their proximity to other scenic areas. The reason for some others being excluded is more mysterious; the long-term failure to designate the Yorkshire Wolds an AONB is particularly egregious.

It's worth pointing out here that DEFRA's own *25 Year Plan* aims to improve air and water quality and to protect plants, trees and wildlife by creating "a growing and resilient network of land, water and sea that is richer in plants and wildlife". Such a network will not be achieved when areas with some of the strongest protections are deliberately kept well separated; on the other hand, however, powerful networks could be created by joining protected areas, in the way the Lakes and Dales national parks were recently linked. We would strongly urge the Review to consider this aspect.

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 weaknesses of any landscape or conservation designation which restricts development are that (a) development may simply leapfrog them to unprotected land beyond them and (b) their existence, in effect, downgrades protection of other countryside which is not so protected. These are potential drawbacks of green belts, which we otherwise strongly support, for instance.

We recommend, therefore, that the Review give thought to the protection of countryside at large, to defend its important natural capital and the ecosystem services it provides. Greenfield land provides much of our food and timber, all of our water, much of our flood control, carbon sequestration, biodiversity, much of our outdoor leisure and all of the

intangible benefits that the countryside provides, including much of our sense of national identity. At the moment Government policy appears to dismiss all these important goods as worthless compared to the need to provide low-density housing. Even “best and most versatile agricultural land” enjoys no real protection from the planning system.

Part 4 - Closing thoughts

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?

It is concerning that the protections in national park and AONB policies cease abruptly at their boundaries, even when there is another designation like green belt in the surrounding area. Several AONBs are suffering from major developments right up to their boundaries, despite the deleterious effect this has on their amenity through visual intrusion, disturbance or light pollution.

Development, for example, is proposed on green belt land on the edge of Sundon Hills Country Park in Bedfordshire which adjoins the Chiltern Hills AONB, impacting on the natural beauty the AONB designation is theoretically supposed to protect. This is not an isolated example; there are numerous such examples in southern England and beyond. Official landscape character assessments are all too frequently being ignored. The planning system, and its erosion, is a key element in the conservation of designated areas.

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

It is concerning that the way the Review has framed its questions appears to downplay the vital issue of the relationship between protected areas and the planning system. It may be that this is because DEFRA, rather than MHCLG, is conducting the Review, but damaging developments, particularly housing and highways, is the biggest class of threats to these areas.

As stated in our response to Question 12 above, English national planning policy in relation to national parks, AONBs and heritage coasts needs to be revised.

For instance, paragraph 11(b) of the NPPF needs to be revised to make clear that OAN policies should not apply to Footnote 6 areas, rather than, as now, merely providing “a strong reason for restricting the overall scale, type or distribution of development”. Given the “strong reasons” advanced for housing development and associated highways in the rest of the *NPPF*, this is effectively next to no protection. The effects of this can be seen clearly in the pressure for housing and highway development in several AONBs, the North Wessex Downs for example.

Plainly the existence of AONBs is being effectively ignored in Whitehall planning for strategic development. In the 2018 Budget, the Treasury announced the so-called Oxford-Cambridge Arc would be expanded to take in the whole of Bedfordshire, Buckinghamshire, Cambridgeshire, Northamptonshire, Oxfordshire, Peterborough and the “M4 and M11 corridors”.

This effectively brings most of the Chilterns AONB, much of the North Wessex Downs AONB and part of the Cotswold AONB into a region of accelerated housing and highway growth. The Arc project is already pursuing widening of the A34 through the North Wessex Downs to dual-3 motorway standard and more such damaging developments in AONBs are inevitable.

We agree the “silo” approach in Whitehall is to be avoided, but the relatively low interest in vital planning and development issue in this Review and in wider policy on national parks and AONBs is surely silo thinking of the worst kind.