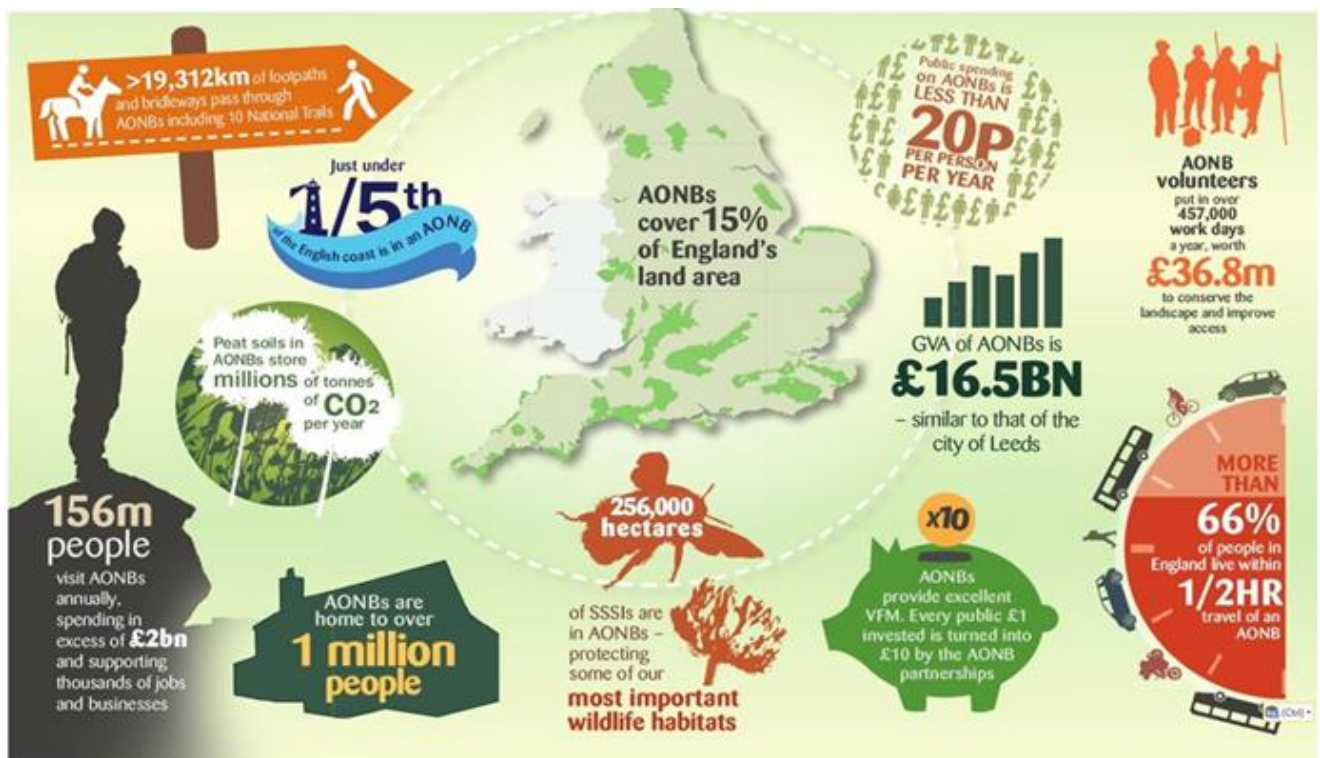




The South Devon AONB Partnership evidence to the Review of England's National Parks and Areas of Outstanding Natural Beauty



Contents

Part 1 – Opening thoughts	4
What works overall with the present system of National Parks and AONBs in England?	4
What does not work overall about the system?	4
Part 2 - Views	7
National Parks and AONBs role in nature conservation and biodiversity	7
Enhancing wildlife and support the recovery of natural habitats.....	8
National Parks and AONBs role in shaping landscape and beauty, or protecting cultural heritage	9
National Parks and AONBs work with farmers and land managers and how might this change as the current system of farm payments is reformed	10
National Parks and AONBs role in supporting and managing access and recreation	11
The way National Park and AONB authorities affect people who live and work in their areas	11
National Park and AONB authorities role on housing and transport in their areas	11
Part 3 – Current ways of working	12
What views do you have on the way they are governed individually at the moment? Is it effective or does it need to change	12
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.....	13
What views do you have on their efforts to involve people from all parts of society, to encourage volunteering and improve health and well-being	13
What views do you have on the way they are funded and how this might change	14
What views do you have on the process of designation - which means the way boundaries are defined and changed	15
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	15
Are there lessons that might be learnt from the way designated landscapes work in other parts of the United Kingdom, or abroad.....	16
Part 4 – Closing thoughts.....	16
Do you think the terms currently used are the right ones? Would you suggest an alternative title for AONBs, for instance.....	16
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 improved17

Do you have any other points you would like to make that are not covered above17

Part 1 – Opening thoughts

What works overall with the present system of National Parks and AONBs in England?

Consultation and engagement activity in South Devon consistently shows that AONBs and National Parks are highly valued, national natural and cultural heritage assets. Together our designated landscapes represent a valuable but finite and irreplaceable resource, the very best of England's varied landscapes. The present system provides an identity and status for defined geographical areas, covering a meaningful area appropriate for landscape management, nature conservation, recreation and tourism. The original reasons and rationale for designation remain relevant and contemporary. AONBs and National Parks are recognisable as areas of distinctive character with evident special qualities that include landscape and scenic beauty, tranquillity, wildlife, relative wildness, historic and cultural environment.

AONB Partnerships:

- are supported by dedicated small staff teams are efficient and effective at local delivery
- have established reputations as honest brokers and conveners, trusted and respected to act with integrity.

AONBs in particular provide excellent value for money, effectively leveraging in substantial additional resources and support, achieving much with limited resources, through partnership working and consensus building.

AONB Partnerships consistently lever in external funding. In South Devon AONBs case a typical gearing is achieved of £10 for every £1 of central government or local government grant.

Although AONBs operate under a single statutory purpose, a wide range of other related work is undertaken providing multiple benefits. Statutory Management Plans for designated landscapes are integral to developing consensus and galvanising action.

What does not work overall about the system?

Requested actions:

- A fresh and modern take is required on designated landscape statutory purposes. Purposes should be future proofed, focused on enhancement and equivalence across all protected landscapes.
- Ensure parity between AONBs and National Parks through the alignment of statutory purposes, specifically to include for AONBs 'wildlife and cultural heritage' and to add the promotion of understanding and enjoyment of their area's special qualities as a subsidiary purpose.
- Strengthen the s85 CROW Act 2000 duty to have regard for the conservation and enhancement of natural beauty of AONBs and comparable duty for National Parks contained within s11a National Parks and Access to the Countryside Act 1949 by

replacing ‘to have regard for the conservation and enhancement of natural beauty of’ with “to further the purposes of designation”. Responsibilities should be placed on public bodies to:

- Make decisions that further the purposes of designated landscapes
- Actively deliver designated landscape Management Plans and clearly identified priorities for action
- Develop and issue a Government circular to clearly define natural beauty; clarify what is meant by the highest status of protection for these landscapes; and ensure equivalency and parity across AONBs and National Parks.
- Implement effective cross government (central and local) thinking and working, recognising the full value of our designated landscapes
- In recognition of the tilted planning balance that applies to development affecting designated landscapes, strategic planning and development management functions of local planning authorities with responsibilities for AONBs should contain staff with designated landscape specific training, knowledge and skills.
- Require separate Local Plans or Development Plan documents for AONBs and their settings.
- Statutory consultee status should be given to AONB governing bodies together with appropriate levels of resources to meet levels of demand from local planning authorities.
- Require a comparable core set of data as supplied for National Parks to be cut to AONB boundaries.
- Use “Outstanding landscapes” as a national brand to recognise the equal value of AONBs and National Parks

Rationale:

Confusion over what is meant by the term “natural beauty” has led to different interpretations of role and function of the designated landscape management bodies.

Whilst the National Parks and Access to the Countryside Act 1949 referenced natural beauty in the primary purpose for both National Parks and AONBs, the 1995 Environment Act served to confuse by giving wildlife and cultural heritage separate and explicit mentions in the context of National Parks only. This artificial difference between AONBs and NPs does not reflect today’s societal need and expectations of both types of designated landscape nor reflects the original meaning of natural beauty that included flora and fauna.

Frequent public and professional misunderstanding occurs over the status of AONBs compared with National Parks. There is a pressing need for national level clarity and to be more explicit re equivalence of the two designation types.

“The conservation and enhancement of natural beauty” when balanced with other national and local priorities seems to consistently be viewed by some as “nice to do” but not an essential or statutory requirement.

For AONBs, the highest status of protection is consistently not matched by decision taking impacts. In recent years this has led to a perception by some in South Devon of

designated landscape quality being degraded and the 'protected landscape' element of the designation being weak. This has often been expressed by AONB critics as the designation and its managing body having "a lack of teeth". Section 85 CROW Act 2000 duty of regard for the conservation and enhancement of the natural beauty of AONBs is widely regarded as ineffective, with little or no follow up or penalties in cases of transgression. The duty is often translated as needing to simply consider natural beauty in a cursory manner but in practise natural beauty is simply dismissed or trumped by other issues deemed to be more important. In the context of South Devon AONB we often hear from members of the public passionate about their local protected landscape who are confused, frustrated and angered by decisions and resultant change that does not appear to correlate with the legislative aims for protected landscapes, particularly AONBs.

As per the Countryside and Rights of Way Act 2000 Natural England are statutory consultees on development matters affecting AONBs but declining resourcing levels mean that advice to LPAs is in practice very limited, usually contains standard text in respect of AONB matters and often signposts LPAs to seek the views of the local AONB Partnership. In South Devon AONB's experience, responding to this need has created a significant capacity issue for the Partnership and its Staff Unit as development pressure is high. The cumulative impact of small developments has led to notable landscape impacts and the gradual erosion of many special features is starting to irrevocably harm the area.

From a South Devon AONB perspective, the rate of change within and outside the AONB that negatively impacts on the natural beauty of the South Devon AONB risks the designation not being fit for purpose or meaningful in the future. Cumulative negative impacts principally arise from unsympathetic development and land management practices, coupled with unsustainable actions from some visitors and residents (including urbanising house and garden modifications, noisy and intrusive activities. National Parks have Local Plans for their designated landscapes, however AONBs rely on the local plans of their constituent local planning authorities to guide decision taking.

Overreliance on advocacy can result in slow progress, though does lead to better buy-in, engagement and longevity. However there may be occasions when more dynamism and 'taking of the lead' is required by AONB Partnership's and their staff teams to address significant matters. Integration of terrestrial, coastal and marine management could be improved through holistic management across all three zones recognising that coastal protected landscape have a particularly important role to play.

Value added by the designation, managing bodies and staff teams is not easily identified and communicated. A better system of measurement/monitoring is needed. There is a marked difference in the cutting of nationally available datasets, with a lack of parity between AONBs and NPs. NPs have a wide range of data supplied cut to NP boundaries, whereas AONBs do not. Consequential data processing and GIS analysis results in an additional burden for AONBs.

Current AONB protections through legislation and planning policy do not result in the conservation and enhancement of natural beauty. Consents for major development in the immediate setting to the South Devon AONB risk compromising the designation itself. The treatment of major development in planning policy in and outside of designated

landscapes (DLs) is at odds with the legislation for DLs. Current and previous NPPF wording only allows for more stringent approach to major development within designated landscapes but equally impactful major development located in the settings of DLs is not subject the same tests. Long term, and particularly for narrow or intricate AONB boundaries with a long 'edge', the boundary to DLs is likely to be defined in future by development.

Cumulative negative impact of many changes including numerous small scale change is resulting in a loss of distinctive character and reduction in quality of AONB appearance.

The magnitude and direction of change affecting the South Devon AONB has resulted in some parts of the designated landscape deteriorating or diverging in character and appearance – eroding valued landscape character. Cumulatively, these changes overshadow large areas where landscape change has been maintained, or to a smaller degree enhanced AONB character and appearance.

Within an increasingly reductionist society seeking summaries in preference to detail, the Management Plans for complex designated landscapes influenced by large numbers of interconnected issues risk becoming too simplified and generic to be meaningful. Nuance, depth, spatial variation and targeting risk being lost and with them the maintenance and enhancement of distinctive character. This trend contrasts with the need to become clearer, smarter, more focused and targeted with interventions to recover nature, achieve net environmental gain, track changes in natural capital and target new environmental land management system investment.

Part 2 - Views

National Parks and AONBs role in nature conservation and biodiversity

Requested actions:

- Enact legislation to align the first purpose of AONBs with that of National Parks, so that the objective of conserving natural beauty and wildlife (and cultural heritage) applies equally to both AONBs and National Parks.
- Alternatively, clearly define natural beauty with a modern day, future proofed interpretation as including wildlife and cultural heritage. Amend the Environment Act 1995, NPPF 2018 etc. to regularise the use of the natural beauty term.
- Fully comply with IUCN Category 5a protected area status, by adopting a 'Sandford' style principle affording the conservation and enhancement of nature greater weight when conflicts arise between managing landscapes for different aspects of natural beauty.

Rationale:

The conservation of nature is a fundamental part of AONB and National Park designation, though public understanding of this matter is not helped by the inherent confusion around meaning of natural beauty and whether or not wildlife or biodiversity is explicitly included within the statutory purpose for AONBs. This ambiguity leads some to judge action in

support of nature conservation and biodiversity as non-statutory, nice to do rather than essential core work.

Enhancement or net gain through the planning system is typically not achieved to any meaningful degree on schemes due to constraints imposed by the financial viability of proposals.

In the case of AONBs, management bodies make important but varied contributions around the country to nature conservation and particularly delivery for biodiversity. Level of delivery often relates to successfully unlocking project grants and resources, developing partnerships where the local area does not have action taking place already or priorities are not being fully addressed. AONB Partnerships add value with the starting point being the drawing together of other partners, evaluating action already being delivered, assessing gaps and considering interventions in support of landscape relevant priorities.

Putting Nature on the Map: A report and recommendations on the use of the IUCN System of Protected Area Categorisation in the UK and the National Association for AONBs response in the form of a Statement of compliance for AONBs in England and Wales re their status as Category V Protected Areas summarised the relationship between nature conservation, natural beauty and protected area management in the UK.

AONBs and National Parks currently contribute to Biodiversity 2020 Outcome 1c – at least 17% of land and inland water conserved through effective, integrated and joined up approaches to safeguard biodiversity and ecosystem services. More needs to and should be done by designated landscapes to deliver on net environmental gain and contribute to the Nature Recovery Network.

Enhancing wildlife and support the recovery of natural habitats

Requested actions:

- A more explicit inclusion of wildlife within an updated and revised set of legal purposes for AONBs
- AONBs and National Parks should be at the heart of government's planned nature recovery network
- AONB and National Park Management Plans should play a substantive role in the restoration of nature and ecosystems at the landscape scale.
- A more substantial and meaningful contribution to enhancement and environmental net gain should be made through the development management system for proposals affecting designated landscapes

Rationale:

Designated landscapes are truly landscape scale and have great potential to play a more meaningful and substantive role in recovering nature and growing the nation's natural capital resource.

With access to more resources and capacity, we could do a lot more. AONB Partnerships and their staff units currently play a significant role in setting priorities for action but arguably need to do substantially more leading on real delivery to recover natural habitats

for wildlife and people. Putting Nature on the Map (referred to in Q9) assessed the contributions to nature conservation being made by England's protected landscapes. AONBs were assessed as only just meeting the minimum level of compliance with the IUCN definition for Category 5a protected areas.

Better baseline information and trend data is required. Would benefit greatly from AONB cuts to existing and future datasets.

Well placed to bring together data, targeted land management actions, improved habitat connectivity, public and business action. However increasing levels of action for nature conservation also requires commensurate levels of resourcing and the typical sources of funding this work through HLF, European programmes and environmental charities is leading to many organisations competing for the same resources.

Designated landscapes should have a substantive role in monitoring and reporting on environmental outcomes throughout their areas.

Estuarine and inshore marine environments are important components for coastal protected landscapes where habitat and species links reach well beyond the designated landscapes themselves.

National Parks and AONBs role in shaping landscape and beauty, or protecting cultural heritage

Requested actions:

- Include a more explicit reference to cultural heritage within an updated and revised set of legal purposes for AONBs bringing parity of statutory purposes with National Parks
- Modify the current 'duty of regard' that applies to public bodies and replace with a duty "to further the purposes of designation"
- Require the production of dedicated Development Plan Documents for AONBs
- Ensure cross-government thinking and working to join up policies, interventions and benefits. This is particularly pertinent for cultural heritage to ensure joinup across Defra, MHCLG and DCMS

Rationale:

To answer this question meaningfully the designated landscapes themselves must be separated out from their management bodies and staff teams. National Parks and AONBs as a collection of national landscapes have provided a reference set to society against which other landscapes and experiences are often judged. This relevance and reach has consistently extended beyond England to a UK, European and Global level. Decisions over the future of England's designated landscapes should be made with this global position in mind and a need to be at the forefront of international best practice.

The England models of designated landscape management were constructed around living, working, cultural landscapes. Integrated landscape management is at the heart of the approach with natural beauty and cultural heritage featuring prominently amongst other

factors. Designations, Partnerships and Staff Units should be fundamental to shaping landscape and beauty and protecting cultural heritage.

Designated landscape management bodies are fundamental to furthering conservation and enhancing landscape and beauty in all its forms, not just in AONBs/NPs but testing approaches and sharing learning and action more widely for the benefit of all landscapes.

Anecdotally, application of the S85 CROW Act 2000 Duty of regard is often translated as “having briefly thought about AONB matters, we went ahead and did what we wanted anyway”.

Cumulative loss of vernacular character is being accelerated through ubiquitous design and use of ‘found anywhere’ materials. Current trends for very large statement homes, full plot over-development and modern agricultural buildings positioned in prominent locations are contributing to threaten scenic beauty. Landscape enhancement or net gain is typically not achieved due to claimed viability constraints on schemes.

The National Trust has played and continues to play a significant role in protecting and managing cultural heritage, landscape and beauty within England’s designated landscapes. From a South Devon perspective, the coastline in particular would arguably look and feel substantially different today had it not been for Operation Neptune and the foresight used at the time to raise funds, purchase and care for in excess of 60% of South Devon’s coastline as part of the campaign. The National Trust continue to be important national and local partners in conserving and enhancing the natural beauty of our designated landscapes.

National Parks and AONBs work with farmers and land managers and how might this change as the current system of farm payments is reformed

84% of the South Devon AONB land area is farmed and the actions of generations of farmers and land managers have shaped the countryside to provide many of the characteristic features we associate with South Devon today.

The South Devon AONB designation and Management Plan, Partnership and Staff Unit are important in developing and shaping farmer and land manager action to conserve and enhance our designated landscape and deliver public goods for public money. NP and AONB Management Plans are particularly valuable tools to articulate landscape scale integrated priorities.

A closer working relationship between Designated Landscape management bodies and groups of farmers and land managers including through farmer clusters, facilitation groups, Farmers Sounding Board, growers groups and cooperatives will be increasingly important as the system of payments is reformed.

AONBs and National Parks are ready and able to work with farmers and land managers to test, trial and pilot new approaches to environmental land management system, ensuring solutions are fit for our designated landscapes.

National Parks and AONBs role in supporting and managing access and recreation

Supporting and managing appropriate and sustainable access and recreation is an important activity to assist with improving public understanding of natural beauty and special qualities and connections to the natural environment. Though not a statutory purpose for AONBs, it is almost impossible to effectively manage designated landscapes without engaging in some element of this.

Managing access and recreation becomes particularly important when biodiversity or cultural heritage interests require protection against disturbance in order to safeguard their future.

For South Devon, the area's estuaries, inshore marine environment and seascape provide the largest open access resource supporting many forms of water based recreation. Access to this high quality resource, the inshore marine component of which forms the marine setting to the South of the designated landscape, is possible via the many AONB beaches, coves, slipways and harbours. These access/egress points provide opportunities to influence behaviour, impart information and answer questions before visitors leave the terrestrial environment for the estuarine and marine.

The way National Park and AONB authorities affect people who live and work in their areas

The AONB designation and the work of AONB partnerships yield major benefits for many of those who live and work in their areas, but more can be done.

National Park and AONB authorities role on housing and transport in their areas

Requested actions:

- Develop an alternative and sensitive approach to providing housing within or near designated landscapes that puts sustainable, affordable, characterful housing to meet local need first.
- Enable modification of the formulae applied to generate objectively assessed need (housing numbers) in instances where the local plan area involved includes land within a designated landscape and/or a designated landscape would be negatively impacted.
- Require proper monitoring and regulation of LPA protected landscape planning performance including the annual provision of caseload data to protected landscape governing bodies

Rationale:

Eight AONBs in the South East and South West of England accounted for all housing applications within English AONBs over the period 2012-17 equating to 74% of all housing applications in AONBs and 79% (30,890) of all approved housing units within AONBs. South Devon topped the list as the most impacted of all AONBs with 96% of schemes above 10 units approved, resulting in the highest density of units per km² of designation. These figures do not include applications for less than 10 houses.

Land suitable for development without significant adverse impacts on the South Devon AONB is extremely limited. It therefore seems fundamentally and morally wrong that much of this resource is effectively given away in planning consents for full market housing in order to generate a few units badged as affordable but that remain out of reach of true affordability for the majority that need them.

The attractive character and high-quality natural environment of the South Devon AONB make the area a sought after place to live, contributing to the driving up of house and land values. Average house prices are significantly above the national average. The small number of affordable housing units built or returning to the market remain out of reach for the majority of people with local connections. New innovative local led solutions are required.

The South Devon AONB in common with other designated landscapes actively supports Neighbourhood Planning throughout its area to find solutions to local housing need consistent with the conservation and enhancement of natural beauty.

The recent and current approaches to developing housing are typically resulting in a loss of local distinctiveness and a fundamental lack of differentiation between the approach taken within versus outside the AONB. This issue extends further to development outside designated landscapes that has an impact upon the AONB and forms part of the designated landscape's setting. This is particularly damaging for narrow areas of designated landscape where there is a disproportionate reliance on the quality of the neighbouring setting.

Joint working with Devon's four other AONBs and two National Parks resulted in the development of a Highway's Protocol for Devon's Protected Landscapes.

Part 3 – Current ways of working

What views do you have on the way they are governed individually at the moment? Is it effective or does it need to change

A strength of AONBs is that their governance models are adapted to suit to local circumstances and achieve wide local 'ownership'. Our own South Devon AONB Partnership model with democratic accountability is a strong model, though within the current system of legislation and policy lacks meaningful powers and teeth.

Irrespective of future governance operating models, maintaining meaningful collaboration and engagement with District, County and Parish local authorities will be critical to the success of designated landscape management.

It is widely recognised amongst the AONB family that under the current AONB operating model there is a critical mass of AONB Staff Unit, largely influenced by available resources, below which it becomes difficult to operate successfully and deliver impactful activity.

There is no statutory duty on AONB partnerships, local authorities, public bodies or other partners to implement their management plans and delivery is currently largely undertaken by the AONB teams with individual partnerships in many cases being reduced to stakeholder fora.

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

AONB family have taken significant steps to work more effectively together. Examples include:

- Basecamp – project collaboration tool
- Landscapes for life national conference
- Resilient Heritage HLF project Future Landscapes Programme
- Embedding Ecosystems thinking
- Devon AONBs joint work and SW Protected Landscapes Forum
- Joint consultation responses, projects and initiatives

What views do you have on their efforts to involve people from all parts of society, to encourage volunteering and improve health and well-being

AONBs are a vital resource for active leisure, provide the opportunity for getting outside, and offer mental, spiritual and physical wellbeing for people of all ages and backgrounds. Evidence clearly suggests that an emotional connection with nature is more beneficial than contact alone and ultimately leads to pro-environmental behaviour. Meaningful connection to nature delivers enormous individual and social benefits. AONBs are accessible to a large proportion of the population; more than 66% of people in England live within ½ hr travel of an AONB. This accessibility offers multiple opportunities.

A good deal more could be done to contribute to this area of activity. Addition of a formal second AONB purpose of furthering the understanding and enjoyment by the public of their special qualities, coupled with adequate core funding of AONB partnership delivery teams would provide a stable base for extending the reach and inclusivity of AONB partnership efforts in this area.

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

Requested actions:

- Five year funding agreements between Central/Local Government and AONB Partnerships
- Funding agreements directly linked to AONB Management Plan priorities and delivery plan actions.
- Adequate, stable, long-term resourcing to increase capacity and delivery enabling the designations to truly work and realise their full range of potential benefits to society

Rationale:

Diversified portfolio of income will be essential for the effective funding of future designated landscape management. All AONBs are pursuing broadly similar strategies including setting up of parallel charities, developing links with businesses, monetising branding and selling services. To date these approaches are not yielding significant income and remain time and resource hungry to both establish and operate.

For AONBs, although less reliant now than in 2011 on central government and local government sources of funding, elements of these contributions must be maintained to protect against funding shock and maintain a minimum viable service.

As a wide range of duties undertaken by AONB Staff Teams on behalf of Partnerships are statutory and designated landscapes are nationally important, an often expressed public view is that some areas of work should be financially supported by the state.

Local authority budgets are increasingly pressured and unlikely medium to long term sources of funding. If replaced by other sources of funding then new funders are likely to exert more influence over how that funding should/must be spent creating a tension between designated landscape management plans and funder requirements.

The AONB model is heavily reliant on HLF and European Programme funding. The future will result in significantly less income from these two major sources. Remaining HLF funding is already significantly more competitive and without dedicated schemes for landscape or biodiversity.

Increasing competition for the same funds amongst the designated landscapes family coupled with declining sources of match funding will continue to represent challenges.

All designated landscapes need to be adequately resourced to support the delivery of their statutory purposes. The funding allocated to just one National Park -the South Downs National Park – is more than the funding for all 34 English AONBs put together. The latter – an annual total of just c. £6m (amounting to around 20p per head) compares with an annual turnover of around £14m per annum, reflecting the remarkable success of AONBs in securing additional funding from other sources. Lottery sources in particular have contributed a total of some £80 million over the past twenty years, however the termination

of HLF's Landscape Partnership programme means that future lottery funding for AONBs is in jeopardy.

AONB delivery is likely to continue to depend on a business model involving a mix of public, private and voluntary-sector resources, however secure core funding is essential to safeguard the future of these national assets, and should be aligned with the effective delivery of revised statutory purposes (including recreation and enjoyment, together with a social duty), and mechanisms need to be reinstated to address the issue of vulnerability arising from the relationship with host Local Authorities whose total budgets will have been cut by an average of 50% since 2010.

There needs to be adequate funding of strategic planning and development management planning activity to allow designated AONB unit planning officers to effectively manage major planning applications and a new statutory consultee responsibility.

There is also a clear need for Natural England to be adequately resourced to function as a national statutory advocate for landscape, championing the role of AONBs across government.

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

Designation should remain the responsibility of a government agency, independent from the local level to avoid piecemeal changes, devaluing of the designations and unpicking the integrity of existing designated landscapes.

However, streamlining of the current process is required in order to improve public perception and accountability. An early stage rapid/initial assessment could assist with providing early feedback on cases and improve targeting of resources.

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

As a minimum, adopt a consistent approach to designated area boundaries at the coast – mapped to mean low water springs.

Consider on individual merit the case for extending existing coastal designated areas to include an element of inshore waters in order to more effectively integrate the management of land, coast and the inshore marine environment. This approach would mirror nature conservation, visual, character, tourism, water based recreation and economic inter-relationships across the land, coast and inshore marine environment. The nominal 2km seaward limit as currently delineated in the Heritage Coast MAGIC dataset could be used to set a consistent seaward boundary.

An alternative landscape centred approach could involve mapping to relic cliff coastline prior to sea level rise.

If new types of designations are to be considered, lessons must be learnt from the current system in operation within England and their purpose(s) clearly defined.

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

Of particular interest are:

- Pembrokeshire National Park and the integrated approach to managing with areas of land, coast, islands and the marine environment
- Scottish National Park system
- Formalising the role of AONB partnerships in relation to their relevant local authorities and strengthening the role of the AONB management plan

Part 4 – Closing thoughts

Do you think the terms currently used are the right ones? Would you suggest an alternative title for AONBs, for instance

The title AONB is well respected and understood amongst professionals. However despite promotional effort at local and AONB Family level, public awareness remains low especially in comparison to National Parks. 'AONB' is often seen as a primarily descriptive term; the (technical) meaning of 'natural beauty' is not widely understood and understanding and acceptance of the high level of protection is not widespread.

In general, and despite the efforts of AONB teams and partnerships, AONBs are still under-delivering on their ambition, legislation and policies. Any rebranding of AONBs (for example as 'National Landscapes' or 'Outstanding Landscapes'), whether statutory or primarily promotional, should be matched by future proofing with a focus on enhancement and alignment with the principles of the government's 25 YEP. This should include a reaffirmation that both AONBs and National Parks have the highest status of protection together with a strengthening of the Section 85 duty of the CRow Act to include a duty of 'due regard' accompanied by an obligation on all partnership members to support the objectives of the AONB management plan.

It is the view of the National Association that the AONB designation would benefit from rebranding, and that this can take place without legislative change. The National Association is well placed to co-ordinate the professional advice required to maximise the positive impact of a rebrand and host a major public consultation in this regard.

The use of two separate terms for England's designated landscapes along with different statutory purposes, funding mechanisms and governance structures has perpetuated a view of two tiers of landscapes. The National Park name and associated brand is recognisable and strong, though English National Parks are fundamentally different from those elsewhere in the world.

Despite struggling with the unwieldy title of Areas of Outstanding Natural Beauty and the often misspelt / misspoken acronym of 'AONB', the AONB family has worked hard with this name and brand since 2000. It may therefore be more effective to retain the current

designated landscape names but bring the two firmly together through reference to Outstanding Landscapes or follow the Welsh lead approach with National Landscapes (of England).

There remains value and merit in maintaining different operating models (National Parks, AONB Conservation Boards and AONB Partnerships) linked to the landscape type they encompass and complexity of local authority structures. However, all need aligning with the same statutory purposes.

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

-

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

The South Devon AONB Partnership would like to take this opportunity to highlight and endorse the submission of the National Association for AONBs and the recommendations contained within.

The South Devon AONB is one of Britain's finest protected landscapes - loved for its significant and irreplaceable landscape features including rugged cliffs, sandy coves, peaceful countryside, picturesque villages, rolling hills, wooded valleys, colourful hedge banks, and secretive estuaries. It is an ancient countryside with strong links to the sea and generations of human activity etched into the landscape. The AONB is a thriving and dynamic work place, a centre for active and creative community life and a popular visitor destination.

In the context of South Devon, the phrase "that would not happen in a National Park" is often used when contrasting an activity in South Devon AONB with that of Dartmoor National Park. This conclusion is often an oversimplification of matters and fails to take into account the fundamental difference in landscape types. We ask the review panel to carefully consider the differing nature of all the designated landscapes in England when making its recommendations.