

## Appendix – Commentary on Glover Review recommendations

Summary comments on all proposals. Commentary made by Tom Munro with much assistance from fellow AONB Managers, most notably Chris Woodruff of East Devon AONB.

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

**We propose a new set of wording applicable to both National Parks and AONBs to read as follows:**

**Recover, conserve and enhance natural beauty, biodiversity and natural capital, and cultural heritage.**

Comment: If implemented, this would replace the current single duty for AONBs to ‘conserve and enhance natural beauty’ and align purposes with NPs on the duty for wildlife (biodiversity), the environment and heritage. It picks out the key elements of the term ‘natural beauty’ into clearer and explicit areas of focus. The use of the term ‘recover’ is a nod to the decline in these key areas, particularly biodiversity.

The NAAONB endorses the call to establish a National Landscapes Service either as a stand-alone body or as part of a reinvigorated Natural England.

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

**We support the call in the Colchester Declaration from AONBs for such work and argue that this should form part of the Management Plans for all national landscapes.**

**The concept of Local Natural Capital Recovery Plans is being developed at the moment. We think it vital that these plans exist at the national landscape level, ideally through the Management Plan route as set out here, and not just as a collection of individual plans by local authorities in those areas.**

Comment: Tying Nature Recovery and Natural Capital to AONB Management plans was a key part of the Colchester declaration launched by the National Association for AONBs (NAAONB) in July 2019. It was based on the premise of Westminster providing the resources to enable this to happen, with a pledge to prepare Nature Recovery Plans for each AONB by July 2020 and for the Ecosystem Services approach to be embedded in all plans by 2024.

The Dorset AONB team has a strong focus on nature recovery work. Additional resourcing and improved incentives or levers would enable wider delivery.

### **Proposal 3: Strengthened Management Plans should set clear priorities and actions for nature recovery including, but not limited to, wilder areas and the response to climate change (notably tree planting and peatland restoration). They should set out (a) an overall vision and (b) detailed and specific ambitions for the entire area.**

**They must be made clearer. We want to see them:**

- **developed and implemented in partnership;**
- **set visionary, ambitious and long-term plans to deliver on their strengthened purposes for nature, people and communities;**
- **set long-term plans to widen funding sources;**
- **provide targets and actions against which their performance can be measured;**
- **be used by the National Landscapes Service to hold landscapes to account for delivery, and support with the allocation of central resources;**
- **become the guiding framework for setting landscape-scale priorities for future payments for public goods and other relevant schemes such as rural development funds.**

**Their implementation must be backed up by stronger status in law.**

**First, the requirement of ‘regard’ to landscapes’ existing purposes should be strengthened to one of ‘furthering’ the reformed purposes.**

**Second, a requirement should be established in law on relevant bodies to support the development and implementation of national landscapes’ Management Plans.**

Comment: The above changes would see a bigger and bolder role for AONB Management Plans. No longer seen as optional to deliver, the new duty to ‘furthering’ the purposes of AONB designation and to not just support but also ‘implement’ the new Management Plans would place a far higher degree of expectation on the role of the plans.

The potential for the new plans is strengthened further to act as frameworks for landscape scale public goods delivery and rural development funding – providing a logical alignment of environmental and socio-economic investment.

The Colchester Declaration's Nature Recovery Plans could be an integral part of an AONB Management Plan.

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

**The National Landscapes Service should play a central role in ensuring a 'gold standard' in partnership is happening everywhere and in fulfilling Lawton's aspiration for our national landscapes to provide "coherent and resilient ecological networks".**

Comment: See proposal 2 comment. It will important that any AONB Nature Recovery Plans fit within a national and regional/county model/context.

**Proposal 5: A central place for national landscapes in new Environmental Land Management Schemes Individual Management Plans should be the guiding framework for setting landscape scale priorities for future payments for public goods which support and enhance the value of nature and natural beauty in all its forms. Key to constructive conversations will be all national landscapes having dedicated farm advisers that land managers can trust. Where these are in place now, farmers often work well with them.**

Comment: Dorset AONB is engaged in the new Environmental Land Management System (ELMS) trials; these are seeking to explore new ways of delivering environmental outcomes on farms as part of a wider NAAONB programme 'Farming for the Nation'.

The proposal for AONB farm advisers would be a logical step if it is expected that the AONB Management Plans are to be developed as guiding frameworks for the delivery of any new programme in these areas. Current operations favour using trusted advisers from FWAG SW and Dorset Wildlife Trust in AONB project delivery; greater funding levels would enable us to further employ such individuals.

**Proposal 6: A strengthened place for national landscapes in the planning system with AONBs given statutory consultee status, encouragement to develop local plans and changes to the National Planning Policy Framework. They should agree with their local planning authorities what they should be consulted upon and be free to comment if something of significance appears. Some additional resource and expertise is likely to be necessary too, but the vast majority already employ officers with planning expertise. There is also expertise across the wider family of national landscapes that can be better shared, and some additional resource could be provided at a national level through the new National Landscapes Service we propose, reducing duplication across all 44 bodies. We want AONBs to work with local authorities to develop local plans and policies which set out a vision, explain how conservation and recreational purposes will be implemented and how the needs and requirements of the local community will be met within the broader context of achieving sustainable development appropriate to these nationally important landscapes. We also accept that AONBs with especially small planning loads, or single local authorities may not feel this is necessary, and we agree different approaches should be tried.**

Comment: Many AONBs reported to the Glover review that they felt AONBs should have a greater role in planning. For some AONBs, across multiple authorities and in areas where housing and development pressure is high (eg SE England) there is a clear need for consistency in approach. In others, there is an opportunity to enhance through the development of design guides and advice.

The Dorset AONB engages in strategic planning and development management via a planning protocol; the partnership employs a Landscape Planning Officer. Statutory consultee status would be likely to increase the current workload and require additional resourcing.

The local plan approach proposal has been piloted in Arnside Silverdale AONB and is at a very early stage. This approach will be influenced by Local Plan schedules/timetables as much as local politics.

Dorset AONB team is engaging constructively with the development of the Dorset Local Plan and has been invited by Cllr David Walsh to attend the Strategic Planning Forum.

**Proposal 7: A stronger mission to connect all people with our national landscapes, supported and held to account by the new National Landscapes Service.**

**We recommend that the second purpose is changed so that it requires our national landscapes to "actively connect all parts of society with these special places to support understanding, enjoyment and the nation's health and wellbeing".**

**We also believe that, long-term, our national landscapes should be playing a much bigger role with others who may be marginalised, such as ex-offenders, looked after children, those suffering addiction.**

**The Sandford Principle<sup>1</sup> should remain in place as discussed earlier, and be extended to AONBs, to ensure the primacy of the first purpose.**

Comment: The above second purpose would be a new purpose for AONBs. However, while it is not currently a purpose for the Dorset AONB, the team carries out significant work in outreach and wellbeing. Going beyond this in any meaningful way would require further resources.

The Strategic Environmental Assessment and Habitat Regulation Assessment of the AONBs plans ensures that any actions are based on supporting the Sandford principle. Therefore the extension of this principle to AONBs is logical and already de-facto in practice.

**Proposal 8: A night under the stars in a national landscape for every child.**

**With help from a new National Landscapes Service, we would like to see national landscapes work with the many organisations already involved in this area to provide a clear, consistent offer for a meaningful visit that we think should include an overnight stay.**

Comment: This would be a laudable aim for any local authority let alone AONB and given the will, achievable. But by default, it means providing (and potentially resourcing) a mechanism to enable this to happen. At a meeting in November 2019, Julian Glover stated that while the recommendation suggests camping out, a night in a tent, camping barn, hostel or other appropriate location would be equally effective.

**Proposal 9: New long-term programmes to increase the ethnic diversity of visitors**

**The National Landscapes Service would take a view across the national landscapes to ensure ambitions and actions were challenging and credible and take a central role in reaching out to other organisations and sectors to improve outcomes in our national landscapes.**

Comment: This is a call to action for all relevant organisations to enable opportunity to others less familiar with or confident, to explore our landscapes. I don't think this should be exclusive to national landscapes, as in reality, the easiest way to grow confidence is taking small steps from the doorstep whether that is urban, rural, adjacent to AONB, National Park, coast or river. There is lots of evidence to support green infrastructure, country parks, local nature reserves as stepping stones to experiencing nature.

**Proposal 10: Landscapes that cater for and improve the nation's health and wellbeing**

**At a national level they should, through a new National Landscapes Service, come together to establish national conversations and relationships with the Department for Health and Social Care, Public Health England and NHS England, to ensure their role and all they can offer is embedded in relevant strategies, policies and guidelines. At a local level, they should all establish strong relationships with local public health teams, clinical commissioning groups and social prescribing link workers.**

Comment: A national landscape lead with national agencies will influence local delivery. A new National Landscape Service would need to play a key role in establishing the strategic influence and direction.

Dorset AONB is already establishing strong links with the relevant bodies through Stepping Into Nature: national relationships would further embed this work locally and potentially aid mainstreaming this preventative work into health sector budgeting.

**Proposal 11: Expanding volunteering in our national landscapes**

**We want national landscapes to develop a structured approach to volunteering.**

**There should be a really strong pro-volunteer ethos right across the board in all national landscapes. It should be a highly diverse, professionally-supported and powerful group of people doing many different things, which could include volunteer rangers, education, practical conservation, surveying and information gathering, wildlife watchers, rights of way support through to people playing a role supporting the administration and organisation of the national landscapes.**

Comment: There already is a really strong volunteering ethos in Dorset. It's not owned or exclusive to the AONB, as many of the volunteering opportunities we create or fund are supported by other organisations in delivery (e.g. EUCAN or DWT). A more formalised approach would require further resourcing.

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<sup>1</sup> "National Park Authorities can do much to reconcile public enjoyment with the preservation of natural beauty by good planning and management and the main emphasis must continue to be on this approach wherever possible. But even so, there will be situations where the two purposes are irreconcilable... Where this happens, priority must be given to the conservation of natural beauty." (Lord Sandford, 1974) [2]

**Proposal 12: Better information and signs to guide visitors**

**As part of this, we think National Parks should take on the legal responsibility to maintain rights of way in the areas they cover and that funding for this should move from local government.**

**Given their size, AONB bodies are unlikely to have the resources in some cases to take on the legal responsibility, but we nevertheless urge close working between them and local highways authorities to ensure that rights of way in our nationally important landscapes receive the priority they deserve**

Comment: We have done a great deal to improve the availability of information about the AONB online, in print and as information boards at key visitor locations. We will continue to work with Dorset Council rangers to ensure that key routes are maintained and signposted. Further resourcing to the AONB for this responsibility could help support those teams' delivery within the protected landscape.

**Proposal 13: A ranger service in all our national landscapes, part of a national family**

**We recommend a 1,000-strong, professional, nationwide ranger service across our 44 national landscapes**

Comment: Dorset Council rangers currently provide a service across the AONB and beyond. In addition, there are ranger-type posts within the National Trust, RSPB, Wildlife Trust, Natural England and Lulworth Estate. The ambition in the review is that this service be built upon, expanded and supported, inevitably needing additional resourcing. It would need to be shaped in such a way as to provide the right service to further the aims of the AONB Management Plan and complement other proposed AONB staff alluded to in the review around planning and farm advice. Logical areas of focus would be around engagement of minority and marginalised groups and there would be merit in considering the relationship of such a role alongside neighbouring AONBs and other ranger services, to ensure there was effective and complementary delivery and the right focus for the AONB.

**Proposal 14: National landscapes supported to become leaders in sustainable tourism**

**Instead, we hope they will be encouraged to apply to become tourism zones under the new Tourism Sector Deal. Such areas would see destination management organisations, local authorities, local enterprise partnerships, and local businesses working together to develop solutions that address local market failures in relation to tourism.**

Comment: Dorset AONB has a good relationship with the local tourism sector and is represented on the Dorset Tourism Association. Any tourism zone development would need to be closely developed with (perhaps by) these existing organisations and align with emerging Local Enterprise Partnership investment plans. There would be a strong case for a joint approach across the Jurassic Coast.

**Proposal 15: Joining up with others to make the most of what we have, and bringing National Trails into the national landscapes' family**

Comment: We work closely with neighbouring AONBs and the World Heritage Site and have jointly delivered a range of programmes and projects and will continue to do so. Further resourcing of the National Trails and bringing them under the aegis of the same National Landscapes Service would enhance opportunities for joint working.

**Proposal 16: Consider expanding open access rights in national landscapes**

**Though it is not a core part of our review, and any look at open access needs a much more in-depth investigation, we think there is a case for looking at whether further access rights should be established, or at the very least considered or trialled in our national landscapes.**

Comment: no comment to add other than perhaps to suggest that the existing mapped open access land could be more usefully encouraged and managed to enable better access than is currently the case. Additionally, we hope that the new Environmental Land Management System would fund access provision where there is demonstrable demand as an incentive for expansion of access rights in specific locations.

**Proposal 17: National landscapes working for vibrant communities**

**We therefore think this duty should be upgraded to a purpose, refreshed, and applied to both National Parks and AONBs equally. We think they should have a statutory purpose to:**

**Foster the economic and community vitality of their area in support of the first two purposes**

Comment: This would be a new 'statutory purpose' and a change from 'taking account' of the socio-economic well-being of the AONB. It adds further statutory purposes for social and economic vitality to the environment purposes to recover, conserve and enhance natural beauty, biodiversity and natural capital, and cultural heritage.

This proposal has links to the earlier proposals for engagement with more diverse communities, well-being and health agenda's and the proposal that the strengthened Management Plans should be frameworks for rural development programmes.

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

**We want to see a National Landscapes Affordable Rural Housing Association formed to help meet the need. Infilling should count towards new build targets in AONBs and local planning authorities in AONBs should also make use of the provision that allows them to demand on-site affordable housing contributions on all sites, including developments of five homes or fewer.**

Comment : The AONB Management Plan recognises the challenge of housing affordability and has policies supporting implementation of affordable housing in appropriate rural exception sites. A national approach would support further provision in the Dorset AONB, and should be welcomed.

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

**More widely, as part of an increased strategic role in transport, national landscapes should encourage 'total transport' schemes, which integrate a wide range of government spending on transport into frequent systems open to a range of users. School and NHS transport money can be used to support public bus services, for instance. We strongly encourage interest in this, following on from successful trials funded by the Department for Transport.**

Comment: Engagement in this topic area requires additional resourcing for the team, but is recognised within the ambition of the AONB Management Plan.

**Proposal 20: New designated landscapes and a new National Forest**

**We think three of the larger AONBs should be considered for National Park status – the Chilterns, Cotswold and Dorset (Dorset and East Devon AONBs).**

**+ other areas to consider – Forest of Dean, Sherwood – a National Forest**

**More joined up working across national landscapes**

Comment: The proposal for a Dorset and East Devon National Park is not new and has been lodged with Natural England for a couple of years now. Both AONB Partnerships have taken a neutral position on the proposal to date which has been developed by an independent group.

Many of the proposals in the review could alter the shape, form and delivery of any new National Park as well as National Landscapes/AONBs. Indeed, by aligning the purposes of AONBs and National Parks more closely, the major difference that would remain would be the planning function of National Parks and a considerably larger funding settlement. The view is that this would bring greater influence and enable deeper and wider delivery of the existing or amended purposes for National Landscapes. It would also alter the local authority relationship and move away from a model of matched funding to centralised funding. Later in the Landscapes Review it states very clearly that new designations would have to be from new money (pg143).

**Proposal 21: Welcoming new landscape approaches in cities and the coast, and a city park competition**

Comment: This should be welcomed and would complement programmes to encourage greater engagement with diverse communities and green infrastructure.

**Proposal 22: A better designations process**

**Above all, this activity should be properly resourced and given greater priority, as this is the main reason for the long delays.**

**We think that a new National Landscapes Service should be home to this work in the future.**

Comment: A better process and greater resourcing for the relevant teams (within NE or a new NLS) should be welcomed. If this were implemented as part of government's response to the review, it is very unlikely that it would be in place to consider the Dorset & East Devon National Park proposal during the development of the Dorset Local Plan.

**Proposal 23: Stronger purposes in law for our national landscapes**

**New purposes to:**

- **Recover, conserve and enhance natural beauty, biodiversity and natural capital, and cultural heritage.**

- **Actively connect all parts of society with these special places to support understanding, enjoyment and the nation's health and wellbeing.**
- **Foster the economic and community vitality of their area in support of the first two purposes.**

Where there is a conflict between any of the three purposes, and the further navigation purpose assigned to the Broads, then greater weight must be given to the first of these purposes under an updated 'Sandford Principle' that applies to all our national landscapes and not just to National Parks as it does currently.

These strengthened purposes will help underpin consequently stronger Management Plans, which in turn, as we set out in earlier chapters, must be given stronger weight in law. They must be the basis for ambitious targeted actions, with delivery to be driven forward by a new National Landscapes Service (see below).

Comment: The proposed new purposes have been covered in our comments above in earlier proposals.

**Proposal 24: AONBs strengthened with new purposes, powers and resources, renamed as National Landscapes**  
**To properly strengthen AONBs, we propose:**

- **Giving them the same reformed statutory purposes (and ensuring that the 'Sandford Principle' also applies) as for National Parks (proposal 23). This reflects the reality that AONBs deliver the same purposes as National Parks.**
- **Increasing their funding (proposal 27).**
- **Giving them statutory consultee status to strengthen their role in the planning system (proposal 6).**
- **Renaming them 'National Landscapes'. Their national importance should be properly reflected by something much less unwieldy that elevates them alongside National Parks.**

Comment: We have covered the first three bullets already.

On the renaming to a National Landscape, it raises questions of a national brand as with the French Parc National where all the Parcs share the same overall branding and modify the internal elements to reflect their local characteristic. A strong national lead would be required for implementation. Such an approach would certainly underline the national significance of the designation and could make it easier, or less unwieldy, for the public and press to understand or say. It would end the oft and unfortunately misquoted ANOB or area of beauty.

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

**A new National Landscapes Service should:**

- **Set the vision and strategy for England's 44 national landscapes from which their own Management Plans will evolve.**
- **Hold national landscapes to account for carrying out these plans.**
- **Drive national and regional collaboration, internally and with partners.**
- **Ensure best practices become common everywhere.**
- **Promote consistent, high-quality standards in our special places, including overseeing a new professional ranger service and visitor experience.**
- **Represent the 44 bodies with a single strong voice to Whitehall, making ambitious offers to the nation, for example on access and recreation, transport, health, education, and nature, as well as advocating on their behalf.**
- **Establish national relationships with key partners on all areas of the landscapes' purposes.**
- **Learn from and work with designated landscapes elsewhere in the United Kingdom, Europe and beyond.**
- **Support non-designated landscapes and initiatives to work with national landscapes.**
- **Provide high-quality, essential services across the 44 bodies, reducing duplication and improving join-up, for example on evidence and research, project development, fundraising, planning support, training and careers.**

Comment

This sounds and rather looks like version of the former Countryside Agency reinvigorated and reimagined for current times. CA was one of 3 organisations which were brought together to form Natural England in 2005 and acted as the advisory and funding body for AONBs, guiding their role and managing/monitoring their delivery. This proposed approach would create a level of management and bureaucracy that has been removed in recent years for AONBs and that has had its benefits and disbenefits. On the positive, it has secured AONB funding and a more direct ear/involvement with UKGov via Defra. On the negative, accompanied by successive budget reductions to NE the

broken funding link has diminished Natural England's role and influence in designated landscapes and impacted on the coordination and guidance received.

The reference to subsuming the national bodies for AONBs and NPs into a reinvigorated and adequately resourced body is a sensible suggestion – whether that be within Natural England or as a separate organisation.

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

- Every National Park should have a partnership group that works alongside the main board, as per the model already in place at the Lake District and in some others. These should comprise the voices of those who have a stake in the national landscape and who are fundamental to achieving outcomes.
- The main boards of National Parks should be reduced to between 9 and 12 members, bringing them into line with other models of public sector governance.
- Members on boards are selected for their passion, skills and experience including biodiversity, natural beauty, culture, leisure, education, and community.
- Every effort should be made to achieve diversity – of social background, gender, age, ethnicity, (dis)ability.
- The main task of each board would be to prepare and drive ambitious delivery of Management Plans, delivering for nature, people and communities.

The structure above should apply to AONBs where possible. We recognise that for some smaller ones it may be over-elaborate or challenging to put in place. For larger ones, it is appropriate.

AONBs may choose to establish similar Planning Sub-Committees, but given their role is not to decide planning matters but to comment, hopefully in future as statutory consultees, they should ensure such committees are proportionate in size.

AONBs may also have on their main board of 9 to 12 one local authority member drawn from the local authorities who contribute funding to the AONB, determined either by the agreement of those local authorities, or if not, by ballot.

Finally, we think there is merit in the idea of a citizen service for selecting community representatives for main National Park and AONB boards and would like to see the new National Landscapes Service work with national landscapes to trial this.

Comment: Our Partnership reflects the approach taken in the Lakes in that it contains key 'voices' and is not just county, district or parish councils.

The proposal to reduce the size of NP boards is targeted at the appointed members. For AONBs, the suggestion that there is just one local authority member would mean a reduction in local authority representation.

It is fair to say that increasing diversity will present challenges to most partnerships. For resource reasons, we have not generally used sub-committees in any form other than the SDF panel, although many projects have steering groups. The best approach would be gradual adaptation and it seems likely that any changes through approved proposals will be phased given the operational and funding implications. It is proposed that governance be reviewed further in the light of these recommendations.

**Proposal 27: A new financial model – more money, more secure, more enterprising**

**We also recommend stopping the complex routing of funds via Defra. Responsibility should pass to the new National Landscapes Service**

**the payment of AONBs in arrears, should also be addressed**

**There should be a new and larger settlement for AONBs, and this should include new resources to reflect their enhanced purposes, responsibilities and activities.**

**In the meantime, AONBs need an uplift. We believe their total funding should be doubled from the current £6.7m to £13.4m, with the uplift in funding that would no doubt come from a revised funding formula implemented over a longer period.**

**The local authority funding element for AONBs should continue.**

**Any new national landscapes must be funded with new money.**

**Importantly, alongside central government funding changes, national landscapes should prepare medium to long term financial plans that reflect a more diverse range of income sources to their organisations, complementing core central government grant-aid with growth in philanthropic giving, trading activities and large-scale externally-funded projects.**

**Either a wing of the new National Landscapes Service or a separate but constitutionally linked charity should be set up with clear charitable aims, strongly commercial and well-connected trustees and a professional team skilled in fundraising.**

Comment: A more indirect funding route reverses the direct line we currently have with Defra. This current relationship does not feel complex at all and has enabled us to have a more direct engagement with the ministers making funding decisions. There is a concern if this was lost through a new National Landscape Service approach, however concern would be somewhat allayed if the NLS were established with appropriate powers and influence. We are already part way towards up-front funding; we hope this will soon move towards a fully up-front model. An increased funding model may have implications for local authorities depending on how it is approached. It seems sensible to address the funding formula as part of any change to enable the goodwill and support that local authorities have provided over the last 20 years remains strong and valued. This might include considering operational/service delivery options with other partners where appropriate and mutually agreeable. A national linked charity model for the National Landscape Service could be well placed to assist in securing large-scale funding programmes for the national landscapes to deliver.