### Dorset AONB – response to the 2022 Glover consultation

#### [ Questions 1-6 cover respondent details]

A stronger mission for nature recovery (p10)

# 6. Should a strengthened first purpose of protected landscapes follow the proposals set out in Chapter 2? (yes/no)

Yes

#### Please give reasons for your answer:

Protected landscape management bodies (National Park Authorities - NPA, AONB partnerships and Conservation Boards – collectively AONBp) align their work to the legal purposes of designation, and beyond that these purposes influence the activity of many other public bodies and statutory undertakers through the 'duty of regard'. The single purpose of AONB designation is to conserve and enhance natural beauty; this purpose should be pursued by all stakeholders for the benefit of the nation.

We believe that amendments to the first purpose will help to align effort towards nature's recovery by protected landscapes management bodies and all other bodies subject to the 'duty of regard'.

We also believe that 'natural beauty' is important to retain within this purpose, as it has stood the test of time; we feel it is a more enduring concept than 'natural capital'.

The concept of 'natural beauty' has not been the limiting factor when it comes to the AONB's delivery for the benefit of nature in the Dorset AONB, as the wider definition includes natural assets alongside the historic environment and cultural assets, and reflects the way these are intertwined. The key factors limiting delivery for nature are:

- inadequate resourcing for the protected landscape management organisations,
- inadequate weighting of agri-environment investment towards protected landscapes,
- inadequate distinctions in agricultural policy to make allowances for the purposes of protected landscapes, and
- insufficient weight given to the purposes of designation in the 'duty of regard'

In addition, the key driver for nature depletion across these landscapes has been (and continues to be) the policy-driven support for the industrialisation of agriculture through agricultural support payments.

Regardless of the final wording of this legal purpose, work on amendments must result in a better and more modern framework of guidance to describe the policy intent. This must reinforce the intent for 'natural beauty' to encompass landscape quality and landscape function.

We promote the definition of natural beauty as described in the Dorset AONB Management Plan (section 2.2):

"Natural beauty remains largely undefined in legislation, despite being central to the NPAC Act 1949. Since then, qualifications and amendments to the legislation make it clear that natural beauty includes wildlife, geological features and cultural heritage while not being restricted to them.

Government guidance relating to AONBs provides a useful nontechnical definition: 'Natural beauty is not just the look of the landscape, but includes landform and geology, plants and animals, landscape features and the rich history of human settlement over the centuries'. More recently the Natural Environment and Rural Communities Act 2006 clarified that land used for agriculture, woodlands, parkland, or with physiographical features partly the product of human intervention in the landscape, is not prevented from being treated as an area of 'natural beauty'.

Landscape beauty is not limited to the visual character but includes all aspects which underpin and contribute to that character. Therefore, the conservation and enhancement of wildlife, built heritage and cultural heritage is integral to the conservation of landscape and its natural beauty."

### 7. Which other priorities should be reflected in a strengthened first purpose e.g. climate, cultural heritage?

We would welcome clarification and guidance around the policy intent for the purposes of designation to include reference to the designation having a role to recover and enhance landscape quality and landscape function, with an emphasis on ecosystem function within these cultural landscapes.

We would welcome a clarified definition of natural beauty to include cultural heritage, including built heritage (e.g. historic monuments or designed landscapes), the cultural legacy of artists (e.g. Thomas Hardy's renditions of the Dorset landscape) and less tangible cultural assets linked to the land including festivals, customs, dialect and language and locally distinctive food/drink etc.

We would also welcome reference to a desired outcome of designation being a contribution towards mitigating and adapting to climate change, with an emphasis on achieving this through the restoration of natural processes.

We believe there is a requirement to develop a Sandford-like principle within the renewed purposes, to ensure that decisions are made in favour of nature where there are irreconcilable conflicts between the listed priorities.

#### Agricultural transition (p12)

- 8. Do you support any of the following options as we develop the role of protected landscapes in the new environmental land management schemes? Tick all that apply.
- Designing the environmental land management schemes in a way that works for all farmers and land managers, including the specific circumstances for those in protected landscapes, recognising that farmers in these areas are well-placed to deliver on our environmental priorities.
- Using Local Nature Recovery Strategies to identify projects or habitats within protected landscapes.
- Monitoring the effectiveness and uptake of the new environmental land management schemes in protected landscapes. Using this to inform whether further interventions are needed to ensure we are on track for wider nature recovery ambitions.
- Creating a clear role for protected landscape organisations in the preparation of Local Nature Recovery Strategies. Our recent LNRS consultation specifically asks for views on the role of different organisations in the preparation of LNRSs, including protected landscapes.

• Building on FiPL, empowering protected landscapes to support decision-making and delivery against agreed priorities, including through dedicated project coordinators and advisers.

No to the first; yes to the rest.

9. Do you have any views or supporting evidence you would like to input as we develop the role of protected landscapes in the new environmental land management schemes?

We believe the protected landscape management organisations should have specific roles in targeting, prioritising and delivering Environmental Land Management schemes (ELM).

Regardless of the roles of the NPA and AONBp the protected landscapes must be prioritised for enhanced investment through ELM, in order to help the Government achieve its 30x30 target. ELM is the most significant public investment stream in public goods arising from the land; if Government is to fulfil its obligations under the duty of regard it should recognise and respond to the need for greater public investment in the management of the fabric of the majority of the land area within these landscapes with a view to delivering public goods for the nation. After all, these landscapes are inherently agricultural; around 90% of the Dorset AONB is actively managed by farming or forestry.

At a strategic level, AONB and National Park Management Plans must influence ELM investment within the protected landscape. These plans must also influence Local Nature Recovery Strategies, as they fulfil the role of nature recovery plans as part of their integrating function utilising the Landscape Approach, enabling decision-making that is cognisant of landscape history, ecology, economy and other human use. It is important to note that these Management Plans are shared plans for place – they are not simply a plan for the AONBp or NPA – and they are widely consulted on to ensure they represent the views of a broad community.

With regard to outcome themes, if protected landscapes are to deliver what is expected of them, additional investment is required to deliver Place and People outcomes (as defined by Farming in Protected Landscapes - FIPL) alongside the Nature and Climate priorities that have been stated for the national ELM programmes. Given the expectation of higher 'people pressure' in protected landscapes and greater resource vulnerability in AONBs in particular, options and payments for the provision and management of access should be available for agreement holders in these landscapes. This could be provided by a continuation of a FIPL-type fund alongside ELM, but greater expansion would be required to achieve volume required.

At a functional level, many AONBp and NPA have a long track record in providing trusted advice and guidance to farmers and landowners. This has been solidified and scaled across all protected landscapes by the FIPL programme and should be resourced to ensure good rollout of ELM within protected landscapes.

FIPL has also shown that there is strong demand for a complementary fund for projects in the farmed environment, alongside more prescriptive agri-environment schemes. AONBp and NPA should be adequately resourced to continue meeting some of this demand. FIPL has also shown that there is a strong demand for an advisory service delivered by the Protected Landscapes. Where National Parks have been able to have teams of land management advisers, provision in AONBs has been patchy and often related to time-limited projects and short-term funding opportunities. AONB partnerships need to much better resourced to be able to provide this advisory function in support of delivering the outcomes desired of them through ELM, private finance opportunities and other mechanisms for effecting positive change.

AONBp and NPA also have a long-standing convening or brokerage function, and are well placed to lead on Landscape Recovery agreements in their areas (and extending beyond, where appropriate).

As part of that brokerage role, AONBp and NPA can also provide a useful facilitatory role in accelerating the transition to regenerative agriculture and food production. It is imperative that this transition takes place rapidly in the interests of this country's food security. Productive regenerative farming which maximises the utility of environmental services and minimises reliance on artificial inputs will not only strengthen the farming economy and community: being based on healthy and active soils, these also provide the basis for a rich wildlife food web.

#### A stronger mission for connecting people and places (p14)

### 10. Should AONBs have a second purpose relating to connecting people and places, equivalent to that of National Parks?

Yes

#### Please give reasons for your answer:

A fuller answer is 'yes, but not necessarily equivalent to that of the National Parks'. We believe if new legal purposes are to be developed for AONBs, the second purpose of National Park designation can be improved upon for the coming century.

AONB management teams are currently expected to operate in this sphere, by their local governance bodies, their local businesses (particularly those in the visitor economy) and their communities. Our operation in this area responds to this expectation and a need to deliver to achieve the current sole legal purpose of designation, despite a lack of specifically allocated funding for this key area of protected landscape management.

This AONB has a reasonably large resident population (approx. 74,600) and receives significant numbers of visitors (15.5 million in 2019). Engaging with these people, connecting them to the landscape, is an essential aspect of 'conservation and enhancement of natural beauty'. The better quality the engagement, the greater the likelihood of those engaged people behaving in a more proenvironmental manner (see University of Derby research -

https://www.derby.ac.uk/research/centres-groups/nature-connectedness-research-group/).

The importance of visitor management came to the forefront during the Covid-19 pandemic, when visitor numbers to the area increased significantly, especially day visitors and first-time visitors. Dorset Council was lucky to receive Contain Outbreak Management Funding in 2021 to allocate towards a very successful Promise to Love Dorset campaign

(https://www.dorsetaonb.org.uk/news/promise-to-love-dorset/; https://www.visit-dorset.com/promise-to-love-dorset/) coordinated by Dorset AONB, Visit Dorset and Dorset Council. The reality is that visitor management has always been, and will always be, crucial to a co-ordinated, multifaceted approach to protected landscape management.

The Dorset AONB Partnership has a strong track record of work in visitor management and the provision of visitor information (see current work here

https://www.dorsetaonb.org.uk/project/tourism\_and\_visitor\_management/) and has provided many educational resources for schools (for example, see

https://www.dorsetaonb.org.uk/project/council-of-all-beings/). This role is demanded and respected by local partners, but has been somewhat ad hoc and sporadic as a function of inconsistent resourcing. A relevant statutory purpose would put this work on a firmer footing.

Additional burdens would need to be assessed, to ensure the resourcing of AONBp for delivery on the first purpose is not diminished.

Enabling access to these beautiful places is also important in supporting the health and wellbeing of the nation; protected landscapes are central to the Natural Health Service. The Dorset AONB Partnership has been working for several years on the ground-breaking programme, Stepping into Nature (<a href="https://www.dorsetaonb.org.uk/project/stepping-into-nature/">https://www.dorsetaonb.org.uk/project/stepping-into-nature/</a>), delivering nature-based activities for older people and their carers. It has been evaluated for health and wellbeing impacts by Public Health Dorset (see impact report <a href="https://www.dorsetaonb.org.uk/wp-content/uploads/2020/09/Stepping-into-Nature-Evaluation-Report\_Part-1\_Impact.pdf">https://www.dorsetaonb.org.uk/wp-content/uploads/2020/09/Stepping-into-Nature-Evaluation-Report\_Part-1\_Impact.pdf</a>). This programme has been supported by the Community Lottery programme, and as such is time-limited. There are insufficient core resources to sustain this programme – better core resources would make it easier to piece together additional support funds.

Key to sustaining delivery is a surer financial footing for AONBs. This relates to Defra core funding: understaffed AONB core teams cannot compete for programme funds with better-resourced applicants. It also points to the need to unlock health funding to provide more 'top of cliff' preventative care in protected landscapes, thus saving costs at the 'bottom of cliff' healthcare treatment. A legal purpose which contains the intent to deliver for health and well-being priorities would support this endeavour.

## 11. Should a strengthened second purpose of protected landscapes follow the proposals set out in Chapter 3 to improve connections to all parts of society with our protected landscapes?

Yes

#### Please give reasons for your answer:

These landscapes are national assets, and as such all parts of society should be welcome in them, and given the opportunities to develop deeper connections with nature and place through the areas' enhanced management.

We support the proposal that the wording of the second purpose should be more up to date and inclusive than the existing 'enjoyment and understanding' purpose of the National Parks.

It is also important that any new statutory burdens are assessed, and delivery teams adequately resourced to deliver them effectively.

### 12. Are there any other priorities that should be reflected in a strengthened second purpose?

It would be helpful to clarify the policy intent to reinforce the intention that both purposes are for people and people's wellbeing. It is reinforcement that is required: desire to enhance the nation's health and wellbeing was behind the National Parks and Access to the Countryside Act (1949); the 'Natural Health Service' concept was referred to in the Act's development.

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#### Managing visitor pressures (p16)

- 13. Do you support any of the following options to grant National Park Authorities and the Broads Authority greater enforcement powers to manage visitor pressures? Tick all that apply.
- Issue Fixed Penalty Notices for byelaw infringements
- Make Public Space Protection Orders (PSPOs)
- Issue Traffic Regulation Orders (TROs) to control the amount and type of traffic on roads

Question applies to National Parks only.

14. Should we give National Park Authorities and the Broads Authority and local highway authorities additional powers to restrict recreational motor vehicle use on unsealed routes?

Yes

#### Please give reasons for your answer:

This is an issue where the exercising of a legal right by a few can severely impact on the public goods for many. There is the potential for conflict with other users of rights of way. There is also the potential for off-roaders to affect management decisions by farmers, leading to the potential abandonment of high value nature sites. The following is a direct recent quote from a farmer of a high nature value grassland bank in the Dorset AONB:

"...because of motor bikes and sometimes dogs, the cattle [grazing the bank] have been frightened and have gone straight through fences and, on one occasion, I had to retrieve them from [several miles away]. The use of the lane by four-wheel cars not only frighten cattle and wildlife but can damage the flora. Last Sunday afternoon Neil and I were sowing spring crops in the top field by the Roman Road when two groups of off roaders totalling 22 vehicles went down the bank and through the village. Some of the people in the second group let their dogs out onto the grass field presumably because of the 'call of nature'. A third group of another six 4x4 were prevented from proceeding as Neil had inadvertently stopped the tractor in the gateway. I feel this problem with off roaders is only going to get worse as the summer progresses and the last thing I want to do on any day, never mind a Saturday or Sunday afternoon, is to retrieve cattle from elsewhere. Because of this problem I'm considering not to put livestock there this year."

This evidence shows that many who exercise their right of motorised off-road access are consuming nature; they are not connecting with it. Furthermore, this body of off-roaders not only diminishes the ability for others to connect with nature but they also negatively affect marginal land management operations undertaken for the conservation and enhancement of natural beauty. It is

a 'first purpose issue' for this AONB Partnership as well as one which affects the expectation to deliver on people's connection with nature.

While local highway authorities can issue Traffic Regulation Orders (TRO) to restrict recreational motor vehicle use on unsealed routes, the Dorset Council experience is that the threshold to implement a TRO is high when trying to manage these routes for environmental benefit and for the benefit of non-motorised users. We would welcome a review of the criteria to enable local highways authorities to issue TROs with greater ease, and for greater periods. However, it is important that there remains a requirement for evidenced environmental needs in order to restrict established access rights.

- 15. For which reasons should National Park Authorities, the Broads Authority and local authorities exercise this power?
- Environmental protection
- Prevention of damage
- Nuisance
- Amenity
- Other [PLEASE STATE]

Tick all

16. Should we legislate to restrict the use of motor vehicles on unsealed unclassified roads for recreational use, subject to appropriate exemptions?

Yes – everywhere/ Yes – in National Parks and Areas of Outstanding Natural Beauty only/Yes – in National Parks only/No/Unsure

Yes - everywhere

#### Please give reasons for your answer:

Greater protections for non-motorised use of unsealed unclassified roads in protected landscapes would be welcome (acknowledging the expectation on AONBs to further people's understanding and enjoyment regardless of statutory purpose), but this is an issue that affects rights of way across the country.

17. What exemptions do you think would be required to protect the rights and enjoyment of other users e.g., residents, businesses etc?

Exemptions should include authorised access to private residential and business property and access for the purposes of farming, forestry and land management including habitat management. Motorised use of these routes also provides a way for less able-bodied people to access remoter parts of the countryside, to enjoy the benefits that this provides. Exemptions should protect this opportunity.

The role of AONB teams in planning (p18)

18. What roles should AONBs teams play in the plan-making process to achieve better outcomes?

The Dorset AONB Team has been fortunate enough to maintain a full-time Landscape Planning Officer since the team began. Given that this AONB has a resident population of over 70,000, includes several market towns over an area of 1,129km², this resource is thinly spread. Over recent years a greater and greater proportion of this officer's time has been required to be directed towards the provision of advice on development management and strategic plans, eliminating the time available for monitoring landscape condition or engagement with the community on issues such as tranquillity and dark night skies.

The Dorset AONB Team provides planning advice to 3 Unitary Authorities, 2 County Councils and 2 District Councils. It has had input to the creation of the new Dorset Local Plan particularly on the issue of development allocations, but also on policy matters. In addition, the team typically responds to 130-180 development management consultations per annum, with there being an ongoing trend for the number of consultations to increase year-on-year. The Team's engagement in planning is formalised through a planning protocol agreement (<a href="https://www.dorsetaonb.org.uk/wp-content/uploads/2021/06/Dorset-AONB-Planning-Protocol-May-2021.pdf">https://www.dorsetaonb.org.uk/wp-content/uploads/2021/06/Dorset-AONB-Planning-Protocol-May-2021.pdf</a>) with the constituent local authorities.

Advice from AONB teams with regard to planning should be made independently and in the interests of the designation and its statutory purpose, without fear or favour and based on the NPPF and the AONB Management Plan. There are recorded instances around the country where this independent approach has created a high degree of tension between an AONB team and one of its Partnership's local authorities. This position and independence should be reinforced through Government guidance.

It should be noted, however, that the greatest limitation to good outcomes from development and development planning is the weakness of the duty of regard, which should be strengthened. Local authorities can make development decisions which are injuriously detrimental to the purposes of AONB designation. On occasion these can be called in for decision by the Secretary of State (for example Rampisham Down Solar Park proposal in 2015 – see <a href="https://www.bbc.co.uk/news/uk-england-dorset-33335126">https://www.bbc.co.uk/news/uk-england-dorset-33335126</a>). The call-in process is poorly defined and should be reviewed and republished in favour of the purposes of designation, with a clear method by which AONB teams can trigger it.

#### 19. Should AONB teams be made statutory consultees for development management?

Yes

#### Please give reasons for your answer:

Responses made by statutory consultees tend to carry greater weight, and we would welcome this weight for consultation responses made in support of the purposes of designation.

Natural England is the sole statutory consultee with responsibility for landscape. NE's responses will frequently focus on ecological matters, and may recommend that the advice of the AONB Team be sought. Putting AONB Team responses on the same statutory footing would mean that seeking this advice is not optional.

Given that all AONB Teams (except two employed by the Conservation Boards) are legally part of their host local authority, the definition of where this statutory consultee status resides needs careful consideration. In our view, it should reside with the team who should give their advice in the interests of the landscape, independently of the views of any of the individual constituent bodies or their representatives that comprise AONB partnerships.

Additional burdens arising from this change will need to be adequately resourced. It has been noted that development pressure (and therefore potential additional workload) varies greatly from AONB to AONB. Furthermore, it would be unrealistic that an AONB Team could review and respond to all planning applications, and it will therefore be necessary to set thresholds for consultation, which may need to be adapted to specific circumstances within each designated area.

Typically in AONB teams where there is dedicated planning staff, the expertise is either a professional planner or landscape architect. If consultation responses are to be extended to a definition of natural beauty including geology, habitats and historic/cultural landscape, further professional expertise in those subjects will be required.

It is worth reiterating that the greatest limitation to good outcomes from development and development planning is the weakness of the duty of regard, which should be strengthened.

- 20. If yes, what type of planning applications should AONB teams be consulted on?
- AONB teams should formally agree with local planning authorities which planning applications should be consulted on.
- AONB teams should be consulted on all planning applications that require an Environmental Impact Assessment and are categorised as 'major development' as well as Nationally Significant Infrastructure Projects.
- Other [Please state]

First option – so that the burdens and available resources can be matched.

Local governance (p20)

- 21. Which of the following measures would you support to improve local governance? Tick all that apply.
- YES Improved training and materials
- Streamlined process for removing underperforming members
- Greater use of advisory panels
- Greater flexibility over the proportion of national, parish and local appointments
- YES Merit-based criteria for local authority appointments
- Reduced board size
- YES Secretary of State appointed chair
- Other [Please state]

Other – [the question is really written with NPA Boards in mind]

Local governance:

We would welcome central guidance defining the roles of AONB teams and their host authorities, where this hosting model continues. We would welcome the development of an enhanced Conservation Board type of governance to be made available to those AONBs where it is in the best interest of the management of the designation.

We would welcome central guidance describing the roles and expectations of AONB board members (whether these boards are formalised as a Joint Advisory Committee, an Advisory Committee, or a less-defined Partnership). Board members should act as ambassadors for the AONB within the organisations they represent; while acting on the boards they should make decisions (or recommendations) in the interest of the statutory purposes of designation.

Core funding could be contingent on delivery of key expectations. We believe these should be

- 1. the ability of the AONB teams to act independently in the best interest of the designation,
- 2. the independence of the partnership chair, and potentially
- 3. the requirement for board members to act in the best interests of the designation.

#### National governance:

England's protected landscapes do not need a National Landscape Service as envisaged in the Landscapes Review, and we support the development of a national landscapes partnership. However, critical to the function of this partnership is an ability to draw other government departments into that wider forum. Protected landscapes deliver cross-government objectives and have the potential to deliver much more, given access to those departments to develop delivery relationships. This includes conserving/enhancing cultural heritage (DCMS), promoting their enjoyment through sustainable tourism and recreation (DCMS), promoting their understanding (DfE), supporting people's physical and mental health and well-being (DHSC), supporting local businesses (BEIS), and so on, as well as Defra's responsibilities that lie outside of NE's remit (agriculture, climate change, water).

This partnership must be more than a discussion forum: what is required is a contractual/transactional body that can draw on resources from the other government departments whose objectives PLs are intended to deliver.

A strengthened Natural England is also necessary, where NE can act as a fully-functional champion of protected landscapes and the ability to deliver for the national good.

We question the suggestion to include National Trails in this partnership – while very important in supporting people's access to nature, and an important delivery agent in some protected landscapes, they are not in themselves landscapes. We believe that the national landscapes partnership should remain focussed on the protected landscapes.

### A clearer role for public bodies (p22)

## 22. Should statutory duties be strengthened so that they are given greater weight when exercising public functions? YES/NO/UNSURE

Yes

#### Please give reasons for your answer:

The existing duty of regard is widely known to be weak, and is one of the main factors which limit the ability of these landscape designations to fulfil their expectations. We welcome the proposal to strengthen this legal duty for public bodies and statutory undertakers.

Indeed, alongside adequate resourcing of delivery, this is the joint most important action that government can take for the benefit of protected landscapes.

### 23. Should statutory duties be made clearer with regards to the role of public bodies in preparing and implementing management plans? YES/NO/UNSURE

Yes

#### Please give reasons for your answer:

The duty for public bodies to cooperate to produce a single management plan for an AONB is good, but no parties are beholden to deliver those management plans.

In addition, the Management Plans' status in planning should be better defined to ensure appropriate weight is given to them by all public bodies and statutory undertakers in delivery of their functions.

### General power of competence (p24)

# 24. Should National Parks Authorities and the Broads Authority have a general power of competence? YES/NO/UNSURE

Question applies to National Parks only.

#### Overall

# 25. If you have any further comments on any of the proposals in this document, please include them here. [FREE TEXT]

The Dorset AONB Partnership endorses the response from the National Association for AONBs in setting out what a progressive 21st Century designation should look like. The Landscapes Review panel expressed the need, opportunity and urgency of a meaningful response in 2019, combined in the recommendation 24 "AONBs strengthened with new powers, purposes and resources, and renamed National Landscapes".

The NAAONB proposal is focused on up-to-date purposes, renewed and representative governance, revised powers and a deliverable (and long over-due) increase in resources.

#### Resources – private finance

That AONBs should be properly resourced is the single most important issue underpinning the future success of the protected landscape network and we are very concerned that the response paper fails to address this fundamental issue.

The issue of resourcing is somewhat bypassed in this response/consultation from Government, except in references to increasing private finance. It must be understood that generating private funds requires time and capacity to build relationships, and expertise to understand how such financing might work. Our experience in Dorset is that, while private finance can achieve positive change on the ground, it will not provide resources to strengthen the AONB team. This then creates a vicious cycle: the core team cannot achieve enough relationship-building and development work and the private finance doesn't flow into this landscape – rather it flows to landscapes where the core teams are sufficiently resourced to dedicate time to developing it. Dorset AONB has 4.71 FTE core officers to maintain deliver across 1,125km squared of one of the most diverse, populous and well-visited AONBs: this is simply stretched too thin to invest in the development of meaningful private finance initiatives.

With the exception of philanthropic giving, private finance will also be limited to those areas where a functioning market exists. Currently this is around carbon – although much tighter regulation of this market is required – and water quality, where water companies have been investing in better natural water quality. To maintain functional beautiful landscapes, a wider range of ecosystem services and benefits are required to be supported. It is critical that private finance is seen as being additional to public funding, not as a substitute for it.

#### Resources – core funding

AONB teams have always been aggressively underfunded for their core operations; since 2013 core funds have reduced by a real terms 36%. The Landscapes Review called for an immediate doubling of the Defra funding for AONBs (in 2019). Whilst we don't want to present AONBs in contrast to National Parks, and we not seeking to develop in their image, they are our only ready comparator when it comes to core funding. The 10 National Parks receive 10 x the Defra core funding of the 34 AONBs; the South Downs alone receives twice the Defra funding of all the 34 AONBs combined; allowing for their planning functions doesn't account for this shocking disparity. The entire AONB core funding from Defra approximates to the budget of one medium-sized Secondary School. It's not credible to present this as being in any way justifiable.

We are not trying to shape a designation which receives the kind of core grants of some of the larger National Park Authorities, but it is important to accept that there is a baseline operational structure that all AONB teams need to provide the springboard for greater delivery and to have the capacity to take advantage of opportunities. When challenge funds are announced with short-term application window, small core teams are simply out-competed by larger, better resourced teams which can dedicate more time to fundraising.

Each AONB, regardless of size, should be staffed by a dedicated lead officer, some finance and admin support, specialist staff supporting 1st and 2nd purpose delivery, and a dedicated post for outreach and engagement. Larger, more diverse, more populous and more visited landscapes will require a larger team.

The National Association has set out how it would be possible to double the AONB budget over the life of the Parliament (6 years after it was recommended by Glover) for a total additional investment of £12 million, spread over three financial years. During this time, we will work with Defra to create a new, progressive, transparent funding formula to give clarity over the way public money is invested in all protected landscapes and which would make the teams and the designation itself more sustainable, against a set of agreed baseline functions.

We appreciate the efforts made in a tight Spending review to secure the current increase of 14.7% in 22/23 and flat cash to April '25, but this will not do much more than give greater security to some core posts at risk of redundancy or cut-back. In order to deliver on the 25 year environment plan and achieve the 30x30 ambition – and simply for the good of this nation – government must prioritise investment in protected landscapes on an objective assessment of needs and opportunities. It should also be noted that Local Authorities are themselves often too short of funds to increase a matching percentage, thereby making it impossible to grow the core.

Our response shows a willingness to take on new purposes, priorities and roles. The core teams need adequate resourcing to underpin new delivery, additional burdens of which need to be realistically calculated and remunerated.

Resources: other Government funding

The Shared Prosperity Fund (SPF) could be aligned to help deliver AONB and National Park Management Plans. We advise that Defra work with the Department for Levelling Up, Communities & Housing to ensure that protected landscapes (and the purposes of designation) are included in the SPF guidance issued to local authorities or other decision-making bodies.

#### Closing statement:

AONBs have so much promise with nimble, adaptable governance arrangements, eager teams and a multitude of supporting organisations and individuals. There is immense opportunity to be unlocked in AONBs by changes to legal purposes, strengthening the duty of regard, granting additional powers, reinforcing expectations of independence of operation and adequate resourcing. AONBs have an excellent track record of innovative delivery: this can be scaled within and beyond these landscapes by relatively modest, achievable changes.