

## **LANDSCAPES REVIEW – FRIENDS OF THE DALES RESPONSE**

### **OPENING THOUGHTS**

**Q7. What do you think works overall about the present system of National Parks and AONBs in England? Add any points that apply specifically to only National Parks or AONBs.**

National Parks are a vital national asset, cherished by many. In general, these protected areas are better protected from inappropriate development and have more and higher quality access (public transport aside) than other non-protected areas, and of AONBs generally. Conservation of the landscape and built heritage works reasonably well, mainly because of the Planning Authority role that National Park Authorities play in the context of the higher level of protection that NPs have in the planning system.

National Park Authorities, within their limited resources, play a critical role in delivering the purposes and duties of NPs.

In this densely populated country it becomes even more important to ensure that special areas are set aside to provide for the refreshment and enjoyment of all members of our society.

**Q8. What do you think does not work overall about the system and might be changed? Add any points that apply specifically to National Parks or AONBs.**

It is disappointing that despite the protection that NPs currently have, major developments such as the polyhalite mine in the North York Moors can be given permission. Stronger protections are needed.

The status of biodiversity in our NPs is poor, in fact worse than when our NPs were created. There are complex reasons for this, including farming practices, but a new approach is needed by, we would argue, giving more powers and resources to NPAs to manage an integrated agency approach to this.

NPs, certainly in the upland areas, struggle to sustain vibrant local communities. The Yorkshire Dales National Park is depopulating. The 16-34 year-old population is 17.5% in the area against 26% nationally. There are significant challenges regarding the viability of upland farming, the lack of affordable housing and of well-paid employment. We acknowledge that the primary purpose of the National Park Authorities is conservation and not socio-economic development but without thriving communities to look after the landscape, wildlife and culture of these places, they will wither. These issues face many rural areas, and the solutions to these issues require central government intervention as well as changes to the governance and powers of the NPAs.

The NPAs do their best to deliver integrated delivery body Management Plans but these plans lack accountability and should be strengthened.

We believe that the 'section 62 duty' for public bodies to 'have regard' to NP purposes should be strengthened to 'have a duty to further the purposes of designation'. Section 62 should be re-written to separate out the Sandford principle, which refers to situations where, should any conflicts arise between the two purposes of designation, then priority should be given to the first, conservation, purpose.

Though access in terms of the number and quality of rights of way is excellent, access in the wider sense of the numbers and diversity of people valuing and enjoying these places is poor. Raising awareness of the role that NPs can play in terms of enjoyment and well-being is needed. The lack of public transport in our NPs is a disabler in addressing this access issue.

A bolder vision from government, and from all of us, is needed in matching society's changing needs and expectations to what NPs can offer, and then processes and resources need to be put in place to enable this match.

## **VIEWS**

### **Q9. What views do you have about the role National Parks and AONBs play in nature conservation and biodiversity?**

Biodiversity is a fundamental component of the natural beauty of our NPs, and NPs collectively should play a leading role in improving the state of nature. We share the aspiration for the YDNP to be by 2040 'home to the finest variety of wildlife in England', but we're a long way from that now. Significant losses of species and habitats have occurred: most of the traditional hay meadows have been lost as a result of intensification of farming; moorland biodiversity has been damaged through heather-burning, excessive drainage and the persecution of birds of prey; woodland has declined because of inadequate management; and upland grasslands have been degraded through over-grazing. Only 28% of wildlife sites in the Dales are in 'favourable' condition.

NPs should be exemplars of good practice in enhancing biodiversity, but this requires adequate resourcing.

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

We support the recommendations made in Campaign for National Park's 'Raising the bar: improving nature in our National Parks', noting the importance of the relationship between these recommendations in terms of strengthening links between the NP Management Plan and priorities for future environmental land management schemes.

Given the significant threat that climate change poses to our habitats, consideration should be given to how NPs and AONBs, given their collective land area, can play a more proactive role in tackling the issue for the benefit of wildlife and people.

Improvements will only happen if there is effective co-operation and coordination by the various agencies involved and we believe that there is scope to improve this by giving the NPAs more of a formal role in leading these efforts.

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

This is a fundamental role that NPAs play through their planning authority function and through the Management Plan for the NP, which includes in YDNP a commitment to develop a locally tailored, locally delivered, outcome focused environmental land management scheme to maintain, restore and improve the outstanding natural capital and rural heritage of the NP. The challenge will be if sufficient funds can be found to do this, which is also the case with the plan to repair,

restore, and, where appropriate, find adaptive new uses for traditional field barns – together with stone walls, iconic features of the Dales.

There is a need to identify, conserve and enhance the key locally distinctive and important landscape and cultural heritage features in each NP and AONB – and give their conservation equal weight with nature conservation.

It is important to ensure that the new land management scheme covers landscape and cultural heritage features, which means that the scheme's scope must be clearly defined and the scheme provided with good funding.

It is also important to ensure that the NPAs retain their development control function, which plays a key role in ensuring the protection of the landscape and its historic assets.

**Q 11. What views do you have about the role National Parks and AONBs play in working with farmers and land managers and how might this change as the current system of farm payments is reformed?**

Adequate support is needed for farmers, the primary custodians of our landscape and wildlife, producing food as well as managing land for water quality, flood control, carbon sequestration and many other social benefits.

The issues in the YDNP are: hill farming is unprofitable; many/most farms/farming families are reliant on outside income; there is a legacy of intensification – encouraged by headage then area payments – hiding unsustainability; the significant risk of farm amalgamation and abandonment; and the potential impacts on landscape as well as local population and services.

Progress is being made: Payment By Results grassland pilot for Defra – involves and incentivises farmers; Future of Farming Task Group/member research established; examples of reduced stocking rates/inputs leading to return to profit (High Value Nature Farming); environmental goods and services – audit of public benefits to assist case for funding.

Changes needed include: delegation of powers and resources to NPAs so they have the primary role in designing, advising on, and delivering locally attuned public goods schemes of special relevance to the protected landscapes in long term relationships with land managers; promotion of a low input farm business model; where appropriate, a whole farm approach to a future Land Management Scheme – incorporating landscape/cultural heritage features, as well as nature; provision of excellent environmental and farm business advice, tailored to local conditions

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

We believe that generally, this is well managed by NPAs. Rights of way, in particular, are well managed in the YDNP. There is a potential issue when the desire to attract more people to our NPs results in local congestion, damaging the experience for residents and visitors alike. In the YDNP, Malham is an issue on summer bank holidays for example.

The need remains to encourage more under-represented groups of people, especially from disadvantaged and urban communities, to visit our NPs.

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

The YDNP is sparsely populated and numbers starting to decline. There is a severe and growing imbalance between over 65 (26%) and under 15 (15%). There is limited well paid local employment, and a lack of affordable housing. Schools, Post Offices and other services are closing. There is a significant variation in access to broadband and mobile/4G. Rural bus services are poor and declining.

Many issues are being addressed and are captured in the soon-to-be-issued Management Plan. These include: working with districts/county, seeking new employment/housing and retention of key services (hubs); promoting NP as place to live for younger working age (18 – 44; Research/investment in culture, arts and heritage 'Great Place: Lakes to Dales'; enabling small projects with economic/social benefits; supporting hyperfast FTP broadband (B4RN community benefit company); planning for basic mobile phone coverage and widening of 4G; researching bus service demand, working with operators to meet community needs; and supporting development of rail services. But the effectiveness of the YDNPA's actions are limited by inadequate resources.

**a) Are they properly supporting them and what could be done differently?**

The Management Plan is a best endeavours effort from a variety of delivery bodies but lacks real accountability. Delivery would be improved if the plan had stronger accountability (a statutory requirement?) and if the 'section 62 duty' for public bodies to 'have regard' to NP purposes should be strengthened to 'have a duty to further.'

Additional government support to help NPAs and districts attract working age households and employment to the NP in terms of improved funding and/or incentives offered for businesses to relocate into the NP would be very helpful.

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

The lack of affordable housing is a major issue in the Yorkshire Dales National Park and plays an important part in the lack of young people and working families staying in the area or coming to it. Houses in the NP have a premium of 43% above those in the region outside of the NP, driven by external demand. The availability of social housing has declined. In the YDNP there are 12,000 homes for a population of only 24,000, but 22% of these are now second homes or holiday lets (roughly 50:50) and occupied only for a small part of the year, so that some villages and hamlets are ghost towns out of season. The issue is not the number of houses in the Dales, it is the need for more affordable housing and more housing for rent – in perpetuity. It is not appropriate for NPAs to become housing authorities, but they do need more proactive support from their local Councils in this matter.

Actions needed include:

- Addressing the 2<sup>nd</sup> homes issue. Political support is needed to address this, either along the lines of a council tax premium (tried unsuccessfully recently) or other approaches.
- Ensuring that the stock of social housing is maintained and increased. Consider exempting NPs from 'right to buy' and/or provide additional funding.

- Reducing the 3-year period that a developer has before planning consent expires, to tackle 'land banking'. There are currently 240 housing applications that have been approved in the Yorkshire Dales without work having started.
- Consideration of compulsory purchase where landowners refuse to release land for affordable housing. A number of years ago, 10 sites had been identified for housing development but not one has progressed.
- Relax the planning restriction on the building of bungalows, currently seen as bad building practice and inefficient land use, so that people who wish to downsize can do so, releasing larger properties to the market.
- Enable NPAs to be able to fund and build affordable homes for letting.

The absence or poor availability of public transport is a major issue impacting visitors and residents alike. Friends of the Dales has a subsidiary company which runs, with volunteers, a Sunday and Bank Holiday bus service (DalesBus) but this is a sticking plaster solution. Given that only 25% of households have access to a car, if we are to attract younger, less affluent people to our NPs then the provision of adequate public transport is a key enabler in achieving this. We would like to see the Review consider new ways of funding sustainable transport options. We also believe that the NPAs should be given more powers to better coordinate with local authorities the provision of public transport.

We support the recommendations made in Campaign for National Park's report 'National Parks for all: making car-free travel easier'.

## **CURRENT WAYS OF WORKING**

### **Q 15. What views do you have on the way they are governed individually at the moment? Is it effective or does it need to change, if so, how?**

We would like to see a fundamental review of the governance of NPAs

We suggest that to improve the quality of governance a more rigorous process of recruitment and training is required. We see too many examples, particularly with regard to planning, where we believe local interests are given a higher priority than national ones and where the subsidiary socio-economic duty outranks the purposes. Fixed terms, role descriptions, appraisals and a general adoption of good governance practices by all members, as currently applied to Sec of State appointees, should be considered.

Striking an appropriate balance between Secretary of State appointees and locally elected members is important. We believe that involvement of Sec of State appointees, many who have specialist expertise, makes these Authorities more informed, making better and longer-term decisions, less swayed by local interests.

There are 25 members of the YDNPA. We challenge the effectiveness of such a large board.

**Q 16. What views do you have on whether they work collectively at the moment, for instance to share goals, encourage interest and involvement by the public and other organisations?**

We are not convinced that there is adequately strong and visible leadership at the national level to champion NPs within government and to oversee and improve their management.

**Q 17. 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?**

We believe that there is a huge opportunity for NPs to make a much more significant contribution to the nation, in terms of health (Natural Health Service), physical and mental well-being, enjoyment, and awareness and care for nature.

We have seen the joy on peoples' faces when we have helped them experience the Dales for the first time, particularly individuals from challenged circumstances. Friends of the Dales led a charitable housing group from inner city Leeds on a walk in Ribblesdale and the participants were clearly moved and inspired by the experience. Such experiences can help change lives. And for the 'better off' we hear more about how people now seek experiences over the accretion of material goods, and what better place to build memories of great experiences that in our protected landscapes.

Volunteering provides a marvelous 'win-win', with the NP benefitting from free, often expert, work and the volunteers gain satisfaction and a positive social experience from the mutually beneficial arrangement.

There must be an opportunity to introduce more school children to protected landscapes as an integral part of their education.

A bolder vision from government, and from all of us, is needed in matching society's changing needs and expectations to what NPs can offer, and then the processes and resources need to be put in place to enable this match.

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

Receiving funding directly from central government is welcome; it avoids squabbling between local factions and flags up the national support for the designation. However, funding in recent years has been inadequate and important elements of Management Plans have not been delivered adequately. Our view is that the NPAs, with their dedicated and vocational staff, provide very good value for money and could do much more valuable work with better funding. The uncertainty regarding future funding makes planning and budgeting difficult causing stop-starts on important programmes. Multi-year funding, based on say a rolling 3- year commitment, would be preferable.

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

Our experience with the extension to the Yorkshire Dales National Park is that the process, though rigorous and delivering a good outcome, took far too long (14 years!) and involved an unwelcome degree of political dithering.

**Q 20. What views do you have on whether areas should be given new designations? For instance, the creation of new National Parks or AONBs, or new types of designations for marine areas, urban landscapes or those near built-up areas**

With regards to the Yorkshire Dales National Park, we believe that it would be worth evaluating the incorporation of the Nidderdale AONB.

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

## **CLOSING THOUGHTS**

**Q 22. Do you think the terms currently used are the right ones? Would you suggest an alternative title for AONBs, for instance and if so what?**

**Q 23. The review has been asked to consider how designated landscapes work with other designations such as National Trails, Sites of Special Scientific Interest (SSSIs), Special Areas of Conservation (SACs), National Nature Reserves (NNRs) and Special Protected Areas (SPAs). Do you have any thoughts on how these relationships work and whether they could be improved?**

These other designations are focused on particular aspects - biodiversity, access. The value, and strength, of NP designation is that it covers the whole landscape, and thus encompasses beauty, geology, wildlife, historic interest, culture - thus it becomes an umbrella designation for the more specific, targeted, designations.

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

We believe that there is an opportunity to review the process by which proposed development on or close NP/AONB boundaries are evaluated in the context of protecting the 'landscape setting' of the NPs/AONBs. We have seen examples in the YDNP where this has not happened, with detrimental impact.