

The Exmoor Society Response to the Glover Review Call for Evidence

Part 1 - Opening thoughts

7. 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.

Key points in response to this question:

- **The concept that National Parks (NPs) are of national and international (IUCN Category 5 Protected Landscapes) importance is as valid today as when they were created over 70 years ago, and even more so as they have adapted to changing circumstances. They have a strong identity, the public are very much aware that they exist, and they are appreciated as “ the jewels in the crown” of the English countryside. National Parks represent a unique combination of assets associated with their two statutory purposes. At the same time, within the family of national parks there are differences of detail enabling different priorities to be pursued. Exmoor, for example, is a soft upland national park made up of Devonian rocks, small in area, and with a population to match of just over ten thousand residents. In places, its boundaries are tightly drawn to the moorland line, and a distinctive feature is that the National Park is isolated from the main route ways into the South West. It is designated mainly for its wild, open moorlands and spectacular coast.**
- **As single purpose authorities within the local government framework, National Park Authorities (NPAs) have a unique function of responsibility for their Local Plans and planning decisions within their boundaries. Consequently, each NP can be treated as a geographical whole and so adopt a consistent approach across the park regardless of local authority boundaries. However NPs are not responsible for delivering many services which remain the responsibility of the local authorities (LAs).**
- **National Parks are able to protect and enhance their unique set of assets, thereby contributing to the government’s 25 Year Environment Plan for the natural capital approach. (See further comments on the concept Q 10)**

8. 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.

Key points in response to this question:

- **National Parks and AONBs need a national champion for, and to refocus on, their two purposes. There is need to explain these purposes better, particularly as they relate to landscape conservation, nature conservation, cultural heritage, and scope for health and recreational activities, as well as for their role as places for study to understand environmental issues. Such a new national independent body should include representatives from the voluntary sector whose charitable remit is to protect and promote National Parks. The national body would be constituted to give advice to all government departments that have an impact on NPs, and not just Defra and its agencies that are limited to specific functions, albeit important ones.**
- **National Parks need increased powers to prevent inappropriate development that has a negative impact on their special qualities. The Section 62 duty that all public bodies and utilities should have regard to National Park purposes should be strengthened so as to further them. The Sandford principle should be widened to include protection from inappropriate development as well as recreational conflicts. It is noticeable that Exmoor NPA is being pulled more into adopting LA functions (see answer to Q 13).**
- **There should be fresh look at the make- up of members of NPAs to ensure a better fit with national park purposes (See Q 15)**

- Land management oversight at a NP level within a national framework should be encouraged and accorded equal status with planning as a way of protecting and enhancing national parks (See Q 11)

Part 2 - Views

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

Key points in response to this question:

- Nature conservation today includes biodiversity, geodiversity, wildlife, natural resources and ecosystems. NPs need to include all of these aspects, their National Park Management Plans are the main vehicle by which priorities for Parks are set out on a 5 year timescale. Biodiversity and wildlife are strongly supported with many projects, big and small, involving nature charities as well as NPAs. Exmoor, for example, includes projects led by the RSPB, Butterfly Conservation, Plant Life, the Woodland Trust, the National Trust (a large landowner) and private initiatives such as Graze the Moor Project.
- Even with all this activity there remains, need for a more strategic approach that prioritises local factors, e.g. extending Exmoor's moorlands that are now reduced in size, fragmented, and showing a dramatic loss of heather. By contrast, gorse, bracken and tree cover has increased, and there are contentious debates over the micro management of affected areas through agri-environment schemes. There is concern over how the assessment of SSSI condition is undertaken. Exmoor Society commissioned two Moorland Reports, one in 2004 when 34% of the moorlands were found to be in good condition with 27% in unfavourable but recovering; the other, in 2016, found that only 10% were in good condition whilst 87% were in unfavourable but recovering condition. Criteria for their assessment had changed.

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

- National Parks should be taking a leading role to improve the state of nature. Even though there are many projects in progress, the overall recorded decline in many species is disappointing.
- National Parks should play a key role for nature within the wider national picture and not just at the regional level, within individual designated landscapes. It could be argued that National Parks have a role in furthering the understanding and management of complete ecosystems across their landscapes, with consideration for supporting the wider needs of the country in relation to natural capital and public goods.

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

Key points in response to this question:

- National Park landscapes are the result of the interaction between people and the land over centuries shaping its character and beauty. These special landscapes have evolved slowly over time but have faced increasing pressures and more rapid change since the last decades of C20th. In Exmoor's case almost from its designation. National park authorities play a crucial role in identifying the key components of landscape character and beauty and the actions needed to maintain and enhance them and in protecting cultural heritage. There have been many changes in the approach to landscape conservation over the past twenty years helped by the first European Landscape Convention to which the Government is committed to implement its recommendations. The professional development of criteria for Landscape Character Assessment has been significant. For example, after consultation, Exmoor National Park Authority recently published a

Landscape Character Assessment (LCA). It includes detailed description of Exmoor's nine landscape types and their special qualities, people's perceptions of them, an assessment of their condition, and strategies for the enhancement of landscape quality. The need now is to translate strategy statements into actions, for example by incorporating them into planning decisions (to its credit, the ENPA has adopted the recent LCA as supplementary planning guidance), for present and future agri-environment schemes, and as a way of inspiring people to protect and enjoy the national park in different ways.

- **Recent work on public perceptions of National Parks and the enjoyment of the different landscapes has been revealing. Consistently, many national surveys and those on Exmoor show that the main reason why people visit Parks in such large numbers is because of their wild scenic beauty in contrast to the more apparent humanised countryside.**
- **Over time, views about the importance of, and work on, the different aspects of cultural heritage have changed. For example, nowadays so much more is known about the national parks' archaeology, historic environment, built environment, good design principles, influence of the landscape on the arts, and relationship to people's memories about it. Because Defra has no responsibility for these aspects, cultural heritage can be neglected and under-resourced.**
- **National Park Management Plans play an important role in setting out the main priorities on a five-yearly basis for how the park will be managed in partnership with other bodies. Unfortunately, the Plans deal with the different elements of national park purposes by themes set in questionably short time scales. They contain targets, some of which are expressed in very general terms, others that focus on small details, and some that are not compatible with other themes. A new way of dealing with Management Plans might be to base them on areas defined by landscape type, and by involving multidisciplinary teams to ensure better integration. Although the emphasis is on partnership, reporting can be difficult to persuade other organisations to deliver. Progress recorded is often exclusively about National Park Authority achievements, and therefore undervalues the full range of other sources of achievements made.**
- **The concept of natural capital is relatively new in the policy context. , The Government's Natural Capital Committee has played a major role in ensuring that it is now the foundation for all discussions about ecosystem service provision, and how, conservation, natural beauty (landscape), wildlife (nature) and cultural heritage can be enhanced, valued and closely integrated. The Exmoor Society commissioned a ground-breaking report to establish a Register of Exmoor's natural capital assets. This brings together natural and cultural elements based on landscape types, and is constructed to reflect and encourage local distinctiveness with local involvement by trialling it at a farm level. This approach leads to a comprehensive understanding of the value of the National Park to the nation. Potentially it is the basis for attributing monetary values to the assets using techniques developed by environmental economists. We recommend that all NPs should compile their own Registers.**

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?

Key points in response to this question:

- **Farmers and land managers have key roles in supporting the purposes and implementing the policies of National Parks. It is pleasing to acknowledge the synergies between farmers and National Park bodies, particularly as some in the environmental movement mistakenly have painted farmers as enemies of the environment. Farming practices have changed since Dower, and are widely considered to have had damaging impacts. But many of the solutions now being suggested rely on farmers' participation to achieve environmental**

objectives. The Exmoor Society recommends 'Exmoor's Ambition', co-designed as a land management scheme by Exmoor NPA, Exmoor Hill Farming Network and environmental bodies, to deliver public goods in return for public payments within the framework of a national scheme.

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

Key points in response to this question:

- In the broadest sense, the educational role for National Parks is of paramount importance. It is the prerequisite for enabling public acceptance of the need to manage people's access and recreational enjoyment of them. Without understanding, there cannot be appreciation of the need to calibrate access and enjoyment to National Park Authorities' exercise of the duty of care which is their responsibility for the special, often unique and irreplaceable, qualities of the places in their charge. There is still much work to do in finding ways that help the public appreciate the need to balance conservation with people's active recreation. Some imaginative activities to engage school children are being tried, sponsored by NPAs, the National Trust and Field Council.
- Outdoor recreation is ill-defined, and not every recreational activity will be suitable for all places in a National Park. Those areas of relatively large open spaces, for example, providing experience of wildness and tranquillity, should be protected from signposts, car parks, fencing and other unsightly intrusions.
- Hobhouse said that Exmoor was suitable for motoring, walking, and riding. Such wide-ranging activities involving people's mobility in a National Park mean that recreational management needs to be actively pursued in honeypot areas, the wilder areas, and at certain times of the year where ground nesting birds are found. Organised large-scale challenge events for charitable or commercial gain are particularly difficult to manage. So are night-time events disruptive to wildlife and local people. NPAs should be given powers to regulate and prosecute disregard for damaging activities.

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

Key points in response to this question:

- National park authorities inevitably affect local people. Some who earn a living from tourism will want more visitors to come; others, such as retired residents, may not. Many people whose first contact with the NPA is over planning are more likely to have a negative view, especially if their planning application has been turned down. They may be led to believe that NPAs discourage all forms of development. This perception is misguided. In practice, the majority of planning applications are passed by delegation and very few, the more controversial ones, reach the planning authority for decision. It is noticeable that NPA members do not always follow strong recommendations, whether for rejection or support. In a small and sparsely populated national park like Exmoor, with a population of just over 10 thousand, most people are acquainted, which sometimes makes it difficult to arrive at a decision on strictly objective criteria.
- There is now a much greater awareness of the need to respond to the needs and wishes of local communities. ENPA, for example, holds five Consultative Meetings a year to consider issues of concern, mainly attended by Parish Council representatives. Other charities attend and promote their projects. In the last seven years the Exmoor Society has introduced an annual Pinnacle Award, worth £3000 to the recipient, to encourage young entrepreneurs aged between 18 and 27 to start or develop a land-

based business . The aim is to demonstrate the commitment of conservation bodies to rural livelihoods and young people who want to find work and remain in their local community. Some of the Exmoor winners have been able to employ others as well, adding to the benefits. Many other bodies can provide other examples.

- **Local Authorities still operate within National Parks and have important socio-economic functions. There is a real danger that NPAs are pulled too much into these areas to the detriment of their core purposes. There are real problems in remote rural areas, such as loss of rural services and the need for affordable housing. These all need to be addressed by finding different appropriate solutions. Only some can be pursued by both ENPA and other bodies, including communities themselves, and should be led by Local Authorities.**

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

- **Support is mainly through the Local Plan, but NPAs are not the delivery bodies. The Exmoor Society debated a third purpose for NPs, as has been considered before, but concluded that it is better instead to strengthen the existing duty “seek to foster the economic and social well-being of local communities within the national parks when pursuing their purposes.” It is important not to distract the NPAs from concentrating on implementing their core purposes, nowadays more detailed, complex, and requiring greater time and money than ever before.**
- **The ES notes that ENPA can provide many examples of their support to local communities.**

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

Key points in response to this question:

- **The Exmoor Society considers that the delivery of housing and transport are mainly the responsibilities of local authorities and other bodies with a socio-economic remit. However, the NPA plays an important facilitating role through the Local Plan. ENPA has developed for inclusion some imaginative ways in which they can support the need for more affordable housing that also encourages good design.**
- **National Park Authorities must be able to continue using planning policies which help to deliver affordable housing and also support the most appropriate forms of housing for their localities.**

Part 3 - Current ways of working

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?

Key points in response to this question:

- **National Park Authorities currently are governed by members mainly appointed from local authorities, and with some Secretary of State appointees including parish representatives. ENPA for example, comprises 22 members, including 12 local authority (4 Somerset County Council, 2 Devon County Council, 4 West Somerset District Council, 2 North Devon District Council), 5 parish members and 5 Secretary of State members. Membership has always included a majority of local authority rather than national representatives, but the balance now has gone too far with so few representing the national interest. There are opportunities to improve governance more in keeping with today’s best practice. Consideration should be given to the following requirements: 1) NPA appointment**

committees should to seek to identify people with appropriate skills, 2) all membership categories should be treated in the same way, such as by the introduction of fixed term membership for everyone, 3) compulsory training to assure members' competence to take decisions consistent with pursuance of NP purposes, 4) formal role descriptions.

- Exmoor's 22 members representing a small population is excessive, and far too costly. There should be a reduction to 16 members at most.

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?

Key points in response to this question:

- Please refer to the answer to Q8, making the case for an independent national body to be created with a leadership role to champion National Parks, AONBs and all designated landscapes. At present, Natural England has oversight responsibilities. But these should be transferred to the new body envisaged which can assume responsibility for all national park purposes and also help to raise their national profile.

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?

Key points in response to this question:

- At some time in their school career all children should have residential experience of a national park (as was once available as part of the National Geography curriculum) The ability to take part in some form of citizen service, such as experience of volunteering, should be encouraged. On leaving school there should be further opportunities take part in some form of 'rites of passage' activity, e.g. the Ten Tors Challenge, some form of study, as well as volunteering for community service.
- Health and wellbeing increasingly are seen as a key part of the value that national parks provide for the nation. Many bodies, large and small, are now encouraging healthy activities such as orienteering, hiking, running, horse riding and cycling. The Exmoor Society runs a popular and well-attended annual walks programme led by knowledgeable volunteer walk leaders.

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

Key points in response to this question:

- National Parks are of significant value to the nation as a whole. As such, NPAs should receive their core funding from national Government. But more innovative ways are available for NPAs to raise money, e.g. by tourist taxes, road pricing, crowd funding for specific activities, and charging for use of some facilities and big commercial events which, in practice, may be using public goods which are effectively free for private benefit. Other public bodies and charities also fund activities related to national park purposes, and these could do more with encouragement and seed funding from NPAs. Facilitating others to deliver some activities may lead to further savings for NPAs.

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

Key points in response to this question:

- Exmoor is one of the smallest NPs. An extension should be possible along the lines envisaged in the 1947 Hobhouse Report. That included the Quantock Hills, all of the Brendon Hills, the moorland villages and parishes that have now been cut off from the NP by drawing a tight moorland boundary, and parts of the North Devon coast. However, in order to achieve changes the process of extension should be made easier and quicker. The

present system is laborious, looking first only at those parishes or AONBs that actively want to become part of the National Park.

- **At national level, a new body championing NPs should decide the process to be followed in defining and changing the boundaries.**

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

Key points in response to this question:

- **Exmoor NP should be extended to include the seascape, and make good use of these additional assets, including to provide recreational opportunities.**
- **It would be unwise to create new designations without sound arguments provided in justification of enhancement to a new landscape status. Already there are marked variations in the specific characteristics of NPAs and AONBs, and a surfeit of designations would be sure to dilute their identities as rare and special places to the detriment of their long-term sustainability.**

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

No comment

Part 4 - Closing thoughts

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?

No comment

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?

Key points in response to this question:

- **There are too many designations that could be absorbed into NPs, including heritage ones not mentioned in the question. Natural England, the Forestry Commission, Environment Agency, Historic England each have specialist roles. They should consider delegating some of their functions to NPAs where there are staff qualified in relevant disciplines. On Exmoor, for example, professionally qualified staff have had powers delegated to them by the Forestry Commission and Historic England. Neither Natural England nor the Environment Agency have followed suit so far (see the comments on Q9) which is disappointing and leads to duplication of time and effort.**

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

Key points in response to this question:

- **The contribution of the third sector (non-governmental and non-profit-making organizations or associations, including charities, voluntary and community groups, cooperatives) is underestimated at both national and local levels. The history of the national park movement shows how the third sector has played a key role in raising awareness of the concept of national parks. Today, it not only champions and serves as a watchdog for national parks but delivers services. Some third sector organisations are considerable landowners as well.**

- **The Exmoor Society is an example of a small charity whose objective is to protect Exmoor national park for the benefit of all. It has many loyal members from all over the country who are passionate about Exmoor. Funding is secured from different sources. Recently the Society created a Resource Centre available for general public use, and a shop centrally located in Dulverton. It provides an annual programme of events including walks, talks, awards, competitions, encouragement of literary and visual arts, an annual spring conference on a theme of major current concern, an educational fund, and as a 'flagship' publishes an annual Exmoor Review now in its 60th edition. Not least, the Society both undertakes and sponsors research on important contemporary themes as a basis for acquiring evidence to inform policy. Apart from an administrator and assistant, the Society is run entirely by volunteers.**
- **The Council for National Parks and National Park Societies can give many other examples of how they raise the profile and deliver services in national parks.**
- **Hopefully, the recommendations of the Glover Review will lead to restoring the inspiration provided by the founding fathers which shone through both the Dower and Hobhouse Reports. Their vision has been lost in the last few decades, along with a sense of awe at experiencing these remarkable landscapes and all the public benefits they provide. Hearts as well as minds need to be stimulated so that all can develop "an eye to perceive and a heart to enjoy".**