



# Consultation Response

## Government response to the Landscapes Review Consultation

Date: 6 April 2022

### Country Land and Business Association (CLA)

The CLA is the membership organisation for owners of land, property and businesses in rural England and Wales. We help safeguard the interests of landowners, and those with an economic, social and environmental interest in rural land. Our members own or manage around half the rural land in England and Wales and more than 250 different types of businesses.

#### **SUMMARY OF CLA RESPONSE**

**Weight of the CLA response** - During the consultation period, the government response to the Landscapes Review and the CLA's proposed response to this consultation have been discussed at every CLA Branch committee in England (34 committees) and at several of the CLA's National Committees which discuss policy. The CLA response therefore represents the views of a large number of our members.

#### **The key points from the CLA's response are:**

- **First statutory purpose** – The first purpose must be strengthened so that protected landscapes have a clear purpose to contribute towards nature recovery/conservation and cultural heritage.
- **Duty to foster the socio-economic wellbeing of businesses and communities** – the Duty must be given the same **great weight** as the two statutory purposes and reflected as such in National Landscape Partnership aims and objectives, management plans, local plan policies and decision-making at national and local levels. The CLA will continue to lobby for a third statutory purpose.
- **Protected landscapes must be exemplars of sustainable development** – The government's definition of sustainable development contains three overarching and mutually dependent objectives – environmental, economic, social. Strengthening the first purpose is important, but government must recognise that the requisite management does not happen for free: it must be supported by viable businesses and communities. To continue with of a one-dimensional policy will hinder the overall sustainability of protected landscapes.
- **There must be increased recognition for farmers and land managers** who live and work in protected landscapes and their important role in delivering the Government's aims and objectives.
- **Raising expectations** – the Government response is raising expectations with a wide range of uncosted proposals. The fear is that government may be building expectations that may not be achievable.

## **CLA Response to Consultation questions**

**1. Do you want your responses to be confidential? If yes, please give your reason.**

No

**2. What is your name?** Fenella Collins MRICS

**3. What is your email address?** Fenella.collins@cla.org.uk

**4. Where are you located? North East/North West/Yorkshire and The Humber/East Midlands/West Midlands/East of England/London/South East/South West/Remote**

London

**5. Which of the following do you identify yourself as? National Park Authority or the Broads Authority/AONB team/Local authority/Other public body/Environmental NGO/Other NGO/Professional body/Academic/Business/Resident of a protected landscape/Member of the general public/Other**

Other – memberships association

### **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/UNSURE.**

**YES**

Given the fact that protected landscapes contain a great deal of priority habitat and other valuable environmental features, and in the context of the need for land to deliver multiple outcomes (environmental, social and economic), it makes sense for protected landscapes to have a clear purpose to contribute towards nature's recovery.

It is clear that protected landscape status does not guarantee good outcomes for nature, as recognised in the Nature Recovery Green Paper, which states that protected landscapes do not currently contribute towards the Government's '30 by 30' target. There may be tensions between what is best for nature and what is best for landscape character and public access. Like the economy, ecology functions best when able to change and evolve, rather than being preserved in aspic.

The strengthened statutory purpose must include, as the Glover Report recommended (page 38), the recovery not only of biodiversity and natural capital, but also of natural beauty and of cultural heritage. "Cultural heritage" and "natural beauty" are the primary reasons why people visit national parks and AONBs. It is essential therefore, that they remain at the core of the first purpose, and are also 'recovered', as well as 'conserved and enhanced'.

In many cases, the management required to restore nature, natural beauty and cultural heritage will be the same. In all cases, the Government must not forget that this management, providing

the landscape and wildlife that the public want to see, does not come for free. It has a cost attached for farmers and land managers. A stronger focus on nature recovery should unlock additional funding sources for land management, for example through Environmental Land Management (ELM) schemes, biodiversity net gain or private environmental investment.

However, it is not financially sustainable to rely on government funding as the sole source of income in protected landscapes, and it is unlikely that there is sufficient public money to achieve all the purposes. Instead, these areas must be more economically self-reliant and home, financially, to a broad range of viable businesses. Updated and new management plans must promote and facilitate this economic self-reliance. This means that an efficient, flexible and adaptable planning system is required which includes flexible and adaptable development management policies that not only fit with the statutory purposes but assist in delivering all three objectives of sustainable development. This must be accompanied by a change of mindset by decision-makers, at all levels, from “all development is bad” to a much more positive and open approach being taken towards beneficial economic and social development in protected landscapes. Diversified farming businesses are the key to delivering landscape, nature and recreation within protected landscapes. They are also key to delivering places for job creation and new dwellings. If economic diversification and growth are constrained in protected landscapes by restrictive development policies, then both nature recovery, and the original purposes of the designation, are at risk.

It is time for the government to acknowledge that nature recovery and landscape delivery go hand in hand with flexible and adaptable economic and social policies in protected landscapes that effectively deliver a more balanced approach to all three objectives of ‘sustainable development’.

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

As above, alongside nature recovery and natural capital, the first purpose must continue to include natural beauty, wildlife and cultural heritage.

Managing climate change should be included, but in a way that accounts for protected landscapes’ role in both mitigating climate change and adapting to it. A changing climate will lead to changes in ecology, society and the economy and supportive policies are needed that promote climate resilience, rather than a static or rigid approach. Acknowledging that protected landscapes may not always look as they do now, but that they can still deliver their statutory purposes, is an important first step.

**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**

The CLA believes all of the options above could play a role in ensuring ELM schemes are appropriate for protected landscapes and the farmers and land managers within them.

**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? OPEN**

The CLA believes that Environmental Land Management (ELM) schemes should be national schemes, which work for all farmers and land managers, whether within or outside of protected landscapes. We believe that the schemes will be best served if they are administered nationally by a single agency and we do not see an advantage in creating additional layers of administration. Protected landscape lead partners will have a role to play in facilitating groups of land managers to work together at a landscape scale and in providing tailored advice on ELM schemes and agreements. In this we do not see them as having a qualitatively different role to other local organisations or advisors, but they will often be best-placed to provide this service to farmers and land managers.

The allocation and targeting of ELM funding should be determined nationally, using agreed criteria for what outcomes ELM is expected to deliver and where this can take place. Local Nature Recovery Strategies (LNRS) will be the local targeting mechanism for ELM and these should recognise the special environmental importance of protected landscapes. This should recognise the cost to land managers of delivering the public goods for which these landscapes are valued and designated.

The geography of LNRSs and protected landscapes will not always overlap and it is unlikely that development of LNRSs will be led by protected landscapes, except in very few circumstances. But LNRS statements of priorities will provide an opportunity locally to identify and prioritise the special characteristics of protected landscapes. The CLA has underlined the importance of engaging farmers and land managers in the process of developing LNRSs. We believe a Land Management Advisory Board should be convened for each LNRS area and protected landscapes would be represented on this board. Please see the separate CLA briefing note **“Involving farmers and land managers in the development of Local Nature Recovery Strategies”** which is attached to the CLA’s consultation response.

There are few issues for farming in protected landscapes that do not occur beyond their boundaries, whether it is the presence of environmentally important features, public access

pressures (which occur in peri-urban areas as much as in protected landscapes), or the precarity and isolation of farming businesses and the pressures from the Agricultural Transition and other rapid changes such as new trade agreements and finding new markets. ELM schemes must overcome these issues and support land managers to deliver the public goods the Government want to see.

A well-designed and well-funded ELM scheme, with local targeting via an LNRS that takes on board all views, should help protected landscapes, and those managing the land within them, to deliver their statutory purposes.

There are lessons to be learned from the Farming in Protected Landscapes scheme, including the flexibility of the scheme, which is not overly prescriptive. This allows farmers and land managers, either individually or in groups, to decide on their own projects or goals and bid for funding to achieve these. Collaboration between land managers will be increasingly important in the future and there may be a role for protected landscapes in facilitating and encouraging this collaboration.

#### **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/NO/UNSURE**

##### **YES**

It makes sense as AONBs are effectively delivering opportunities for recreation.

However, the second statutory purpose largely concentrates in planning policy and management plans, on tourism in protected landscapes. The government must recognise that a *'tourism mono-culture'* in protected landscapes is unsustainable: the sector is vulnerable to shocks (as both Covid and Foot and Mouth Disease have shown). Furthermore, the employment profile of the tourism industry tends towards lower paid and seasonal jobs, rather than focussing on delivering an all-year round professional industry with updated and changed employment structures that encourages better quality jobs and higher wages.

What is required are flexible and adaptable development policies, within environmental criteria, which positively encourage investment in businesses and communities. A broader based economy that delivers better quality jobs and wages, together with critically needed housing for local people will drive money into protected landscapes, which will help deliver the statutory purposes.

Question 10 relates to connecting people and places. The CLA has found that those who actually live and work in protected landscapes are largely being forgotten or ignored in the government's response and in many of the DEFRA consultation workshops. Therefore, the strengthened 2<sup>nd</sup> purpose must also **improve connections** with farmers, land managers and communities who live and work in, and maintain, protected landscapes. In our extensive discussions on this consultation, members strongly fed back that businesses and communities living and working in protected landscapes feel that their needs are largely ignored by government at all levels and by the AONB teams. In particular they cite examples of planning

applications for new on-farm diversification opportunities being refused and of planning applications for new affordable (social) housing taking years to achieve a positive outcome. One outstanding attempt to deliver affordable housing for rent to local people in a national park has been ongoing for 20 years!

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

**YES**

The strengthened second purpose must reflect, as part of the levelling up agenda, the **health and wellbeing needs of those** who live and work in protected landscapes, in other words, the businesses and communities in protected landscapes and their needs for jobs, homes and access to services.

**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

**YES**

Yes – tick all. It is pleasing to see government acknowledge the problem and wish to assist authorities and rural communities with the pressures increased visitors to the countryside bring. Providing National Park Authorities with increased powers, bringing them into line with Local Authorities should be seen as a positive step not only for those living and working in these areas but importantly for nature and biodiversity.

PSPOs have been an option for local authorities since the Anti-social Behaviour, Crime and Policing Act 2014 came into force. It was surprising that National Parks were not given the power at the time when both County and District Authorities were.

It is also important to remember that National Parks are not only great havens for biodiversity, they are also made up of working farms, businesses and areas used by local communities. We should all welcome efforts to better protect these wonderful landscapes by appropriate management methods.

**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/NO/UNSURE**

**YES**

Unsealed routes offer off-road options for vulnerable users such as horse riders, cyclists, walkers etc. If these routes are protected for non-motorised users, it would result in less damage to the surfaces and provide a better environment for nature and biodiversity. Authority resources would also benefit from less demanding maintenance responsibilities.

**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]

**OTHER – ALL**

Wildlife and biodiversity are under huge pressure and declining. We are increasingly aware of the need to allow space for nature and how flora, fauna and wildlife flourished when less disturbed during the early lockdown periods. Land managers want to be part of increasing the health and well-being of the public through access to rural areas. However, if routes and areas are in poor condition, suffer from anti-social behaviour or offer little by way of nature and wildlife, the experience and incentive to visit these areas will be severely affected.

**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**

Only Byways Open to All Traffic which were not caught by Natural Environment and Rural Communities Act 2006 would be affected by new legislation to restrict the use of motor vehicles on unsealed unclassified roads for recreational use.

The CLA would be happy to provide specific examples of members' land which has been adversely affected by motor vehicles using these routes.

Restricting the use of these routes by motor vehicles would not only reduce the damage to the environment caused currently but also increase the enjoyment by walkers, cyclists, horse riders and those living and working in these areas. If routes are in better condition, it will also make use by those relying on mobility scooters possible in more circumstances.

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

The legislation referred to at question 16 should not restrict the use of motor vehicles by those who have an interest in the land.

Section 67(5) and (7) of the Natural Environment and Rural Communities Act 2006 (NERC 2006) provided a private right of way for mechanically propelled vehicles for those persons who

have a reasonable need for access by mechanically propelled vehicles to land in which they have an interest. This applied where that access was restricted as a result of the downgrading of rights to restricted byways. In practice, it appears the provision has worked for land managers.

Similar provisions should be included in legislation to restrict the use of motor vehicles on unsealed unclassified roads to consider the needs of land managers and those with private access requirements.

### **The role of AONB teams in planning (p18)**

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

**NO**

Until the government produces impact assessments of the additional costs associated with AONB teams playing a role in the plan-making process then stakeholders, such as the CLA, cannot make a properly informed decision, based on government's supporting evidence, on this question.

Furthermore, AONB teams are already part of the plan-making process as they work with relevant planning authorities to develop and implement planning policies for development in AONBs that takes account of AONB purposes.

#### **19.Should AONB teams be made statutory consultees for development management? YES/NO/UNSURE**

**NO**

We have not been presented with any government evidence, e.g., Impact Assessments, or good reasons that properly justifies why AONB teams should be added to the statutory consultee list in Schedule 4 of the Town and Country Planning (General Development) (England) Order. Therefore, this seems premature, and we can see a number of downsides.

The first is about the AONBs' resources and capacity. Many AONB teams are already involved in commenting on planning applications and in the majority of instances, an AONB response is taken into account by the planning authority in its decision-making.

However, making them a statutory consultee would increase their burden greatly by obliging them to consider each and every application. We are firmly of the opinion that this would not be an efficient use of the AONB team's resources. Given the current lack of capacity (both monetary and people) within AONB teams, if the proposal were to be introduced it would lead to a huge financial burden on government to provide adequate resources to each AONB to build its own planning team that would be effective enough to deal with all AONB-relevant planning applications and planning appeals that are submitted. An under-resourced system would in all likelihood lead to delays in decisions, in a system that is already very slow.

The second downside is about additional constraints for those who own and manage land and landscapes within these areas. These are landscapes that are highly managed and their visual

appearance and beauty depend on land managers and farmers actively maintaining them. Based on their experiences in National Parks and some AONBs, CLA members are very concerned that this proposal will lead to restricted economic diversification and growth due to restricted development opportunities with consequential impacts on businesses viability and the needs of communities for jobs, homes and access to services. Ultimately this could also lead to the landscape's degradation through a lack of private funds to underpin uneconomic landscape management.

**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]**

If government is minded to introduce the measures set out in question 19 despite of the lack of rationale, then in order to reduce the costs associated with introducing these measures the CLA would recommend the following:

**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**

But the government will have to set out what additional funding would be provided to AONB teams so that they deliver an efficient and effective service. We are firmly of the opinion that this would not be an efficient use of the AONB's resources.

**Local governance (p20)**

**21.Which of the following measures would you support to improve local governance?**

Tick all that apply.

- **Improved training and materials - SUPPORT**
- **Streamlined process for removing underperforming members - SUPPORT**
- **Greater use of advisory panels – SUPPORT (see accompanying CLA briefing note)**
- **Greater flexibility over the proportion of national, parish and local Appointments –DON'T KNOW**
- **Merit-based criteria for local authority appointments - SUPPORT**
- **Reduced board size – SUPPORT**
- **Secretary of State appointed chair DON'T KNOW**
- **Other [Please state]**

**OTHER**

The CLA has set out its support above for those measures that may improve local governance. As regards the two measures we are not sure about, these require further information about how the measures might be implemented and supporting guidance.

The CLA is particularly concerned about (i) the calibre of people who are being appointed to authorities/boards/teams and (ii) the appointment of people who have no connection at all with a particular national park or AONB.

The Secretary of State Appointed members recruitment process must be revised to ensure that only those with a demonstrable connection, which includes land managers, in the protected landscape in question, should be appointed. Many SoS appointed members seem to come from surrounding urban areas with a very different level of understanding, even misunderstanding, about what is the backbone of a protected landscape i.e., landscape, biodiversity, diversified farming businesses. Farmers and land managers are key to the delivery of government policies and therefore must be a priority for SoS appointed membership.

In terms of providing greater flexibility of national appointments and in order for land managers who own and/or manage land in each protected landscape to be properly represented, the CLA strongly suggests that the government give consideration to appointing two land managers to each authority/board/team.

In respect of our support for greater use of advisory panels, we would direct you to a CLA briefing note “**Involving farmers and land managers in the development of Local Nature Recovery Strategies**” which is attached to the CLA’s consultation response

#### **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**

#### **UNSURE**

The current duty of relevant authorities is to ‘have regard’ to the statutory purposes. If it is strengthened it will mean that ‘great weight’ is attached to them within the decision-making process.

If the statutory purposes are to be given ‘great weight’ then so too must ‘great weight’ be given to the duty to foster the socio-economic wellbeing of communities. ***The government should change the legislation to provide for a statutory duty to give “great weight” to the duty to foster the socio-economic wellbeing of communities and businesses within protected landscapes.***

The misunderstood and disjointed approach taken to the implementation of the socio-economic duty is very disappointing. This has led to a widespread inconsistency of approach which has undermined the long-term sustainability of many farming businesses across all protected landscapes because they have not felt able to reinvest in their businesses nor been able to diversify to find alternative sources of income. The inability to repurpose traditional farm buildings into dwellings, office space, light industrial and the like is leading to the loss of young people from protected landscapes communities because of the lack of jobs, homes and services. It is also leading to a great many traditional farm buildings collapsing into heaps of stone because policy prevents their conversion to a new economic use, which runs counter to the duty to foster the economic and social well-being of communities, but also of the first

statutory purpose, which includes the need to conserve and enhance “cultural heritage” and “natural beauty”.

If the government is minded to introduce ‘great weight’ then any decision-making process relevant to a National Park or AONB must include a clear statement confirming, and explaining how the statutory purposes and duties, have been considered during the process and in terms of planning application decision-making a detailed explanation of why a planning application has been refused.

### **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**

This role and the production and implementation of management plans must be accompanied by up-to-date guidance on how they are to be produced, what they are to contain, how they will be assessed, evaluated and monitored.

However, we are concerned that Natural England rather than Defra has been tasked with updating management plan guidance, as Natural England maintains that it does not have an economic or social remit. As such we are particularly concerned at how they will treat guidance to deliver thriving local economies and communities which are specifically mentioned by the Minister in the Foreword to the government response. The archived Countryside Agency guidance was underwhelming in its approach to promoting sustainable economic or community developments and this has led to the exodus of younger people from their communities in protected landscapes to find jobs and homes elsewhere. It’s also leading to reverse commuting by those who work protected landscapes but cannot afford to live closer to their workplaces.

As Natural England does not have expertise in the economic and social objectives of sustainable development, we strongly suggest that DEFRA should take the lead in providing guidance for management plans to underpin the economic and social objectives of sustainable development to deliver thriving local economies and communities.

As regards the content of management plans, they must cover nature recovery/conservation, opportunities for recreation, climate change and, we emphasise, **thriving local economies and communities**. Guidance must be provided on how to deliver thriving local economies and communities and the CLA will be happy to assist in producing this guidance especially in respect of how thriving local economies and communities are to be assessed, implemented, evaluated and monitored.

The CLA suggests that relevant statistics and targets to evaluate the socio-economic duty in each protected landscape must include:

- Diversification of key economic sectors in communities
- Numbers of full-time jobs created and wage structures
- Amount of office/light industrial/other work space created in and around villages and market towns,

- Numbers of dwellings (all types and tenures) built
- Numbers of services reinstated or created
- Number of planning applications for economic and community development that have been approved and refused for each protected landscape area

Furthermore, the preparation of management plans must be inclusive so that local people including land managers, feel empowered to be part of the process rather than feeling done unto as is the case today. At the moment, many communities in protected landscapes feel their needs for jobs, homes and services are ignored by government at all levels. This must be rectified, in line with the government's levelling up agenda.

Finally, we would suggest that consideration is given to incorporating a protected landscape's Local Nature Recovery Strategy into the management plan. In this way the LNRS does not form a separate document but is part and parcel of the overall focus on delivering nature recovery.

### **General power of competence (p24)**

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

#### **UNSURE**

It depends on whether a general power of competence will allow authorities and teams to be able to explore commercial, including, green finance opportunities and reduce legal risks associated with delivering critically needed affordable housing, employment opportunities etc.

**Green finance** – there is no specific question on green finance other than a mention on page 24 of the government response. The CLA is firmly of the view that protected landscape teams should be placed in a better position to explore commercial opportunities to raise funding for environmental outcomes. However, any private sector green finance funding that is secured must be ring-fenced for the specific outcomes the finance has been raised for i.e., the project itself.

The use of private sector green finance to support protected landscapes administrative activities (e.g., Human Resources, IT, administration etc) must be prohibited.

Private sector green finance that has been secured should be handled as transparently as possible, accounted for and properly audited. Outcomes must be assessed, evaluated and monitored and publicly available for scrutiny.

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

#### ***Consultation limitations and costing the government's proposals***

It is unfortunate that the government's consultation questions only relate to matters on which legislation may be required. The government response raises a wide range of proposals that are not accounted for in the consultation questions, which means that wide-ranging concerns about

policy matters are only being picked up in DEFRA workshops at which the needs of the people living and working in protected areas only feature because of the CLA's representations.

It is disappointing that no impact assessments of the costs and benefits associated with the proposals in the consultation have been provided. This means that stakeholders have not been provided with the full gamut of evidence to make an informed response to this consultation or in the many workshops that DEFRA ran during the consultation process.

***Duty to foster the socio-economic wellbeing of communities and businesses, and Levelling-up agenda***

The CLA was very disappointed at the government's decision not to take forward proposal 17 for a third statutory purpose to foster the wellbeing of businesses and communities in protected landscapes. The CLA will continue to lobby for the creation of a third statutory purpose because we believe it is important for the vitality of protected landscapes. Otherwise, we fear the continuation of a one-dimensional approach to designated areas which will hinder their overall sustainability.

The CLA acknowledges the importance of protected landscapes and their role in nature conservation, nature recovery and the opportunities they provide for recreation. A well-managed landscape enriches the nation's heritage, but is also an attractive backdrop for the much-needed inward investment and tourism and leisure activities.

The CLA has long recognised the important contribution protected landscapes make to the local economy in providing an attractive landscape where people want to work, live and visit. These landscapes offer public goods and services to wider society that should act as a window to the rural community including farming and other businesses, which is important in raising awareness of agricultural and land management practice, food production and farm-based diversification.

But delivering protected landscapes is not free; its management consumes resources which have alternative uses and value. The environmental value of a habitat, a landscape or a historic building must be underpinned either by a public payment for the delivery of public goods/services or by an economic use. Similarly, policies to conserve the richness of our flora, fauna and landscape must work with, not against, the grain of rural business and must be underpinned by evidence, sound science and flexible policies – whether planning or land management.

Protected landscapes are highly managed: their visual appearance and beauty depend on land managers and farmers actively maintaining them – this is often forgotten. Business viability, in protected landscapes, requires a viable flow of funds, from diversified farming businesses, to be able to afford to maintain and enhance landscape and biodiversity.

However, landscape designation brings with it restriction; environmental considerations often overrule economic and social decision-making processes. This often leaves our members unable to provide a sustainable flow of funds (from alternative sources of income) to sustain both their businesses, and nature conservation and landscape.

Protected landscapes with hard boundaries and buffer zones, and overly restrictive land management and planning policies are not conducive to flexible and adaptable development let alone the delivery of a broader based economy with high value industries creating high wage opportunities that encourages young people live and work in these places because they can afford to do so.

The countryside is dynamic, and our protected landscapes are no less subject to change than townscapes. Rural development must include some development, which means change. If we stifle change, whether agricultural, diversification, housing, local employment sites, or tourism, then our landscapes will cease to function as economic and social entities, and the associated environmental and landscape contributions will die with them.

Protected landscapes and the businesses that produce them need to evolve to be able to adapt to new challenges such as climate change and migration to the countryside. Land managers will also need to adapt their businesses to deliver nature recovery, cope with new species and diseases and find alternative sources of income from diversification opportunities.

The long-standing one-dimensional policy for protected landscapes has not delivered governments' long-term objectives for nature conservation, and the CLA was disappointed not to see a more innovative approach in the government's Landscapes Response. This is likely to make delivering nature recovery harder and more expensive to achieve, and is profoundly out of step with the Levelling Up agenda.

The CLA urges the government to reconnect the three objectives of sustainable development (environment, economy, community) by making protected landscapes exemplars for how to deliver nature conservation and nature recovery, alongside thriving local economies and communities. This can be achieved by properly examining the implementation of the duty to foster the socio-economic wellbeing of businesses and communities and giving it "great weight" in management plans and decision-making on planning applications, also by updating management plan guidance to strengthen the socio-economic aspects.

In summary, the CLA is looking to DEFRA, working, especially, with DLUHC and HM Treasury, to ensure that the approach that it takes to the socio-economic duty, that will deliver thriving local economies and communities, is substantially strengthened in:

- the National Landscapes Partnership aims and objectives
- the guidance that underpins Management Plans
- Management Plans
- Local planning policies

### ***Raising expectations***

The Landscapes response refers to developing a new funding model for protected landscapes and accepts that the core grant will not cover increased funding required to deliver the DEFRA vision for protected landscapes. Furthermore, it's unclear that there will adequate private finance to fill the gap. It is the CLA's view that the government's Landscape Response is raising expectations with a very wide range of uncosted aspirational proposals. This means that stakeholders have not been provided with all the necessary government evidence on which to



make informed a response. The CLA fears that the government may simply be building expectations that may not be achievable.

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CLA reference (for internal use only): A2419154

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