

Department for Environment, Food and Rural Affairs
Consultation on: Nature recovery green paper: protected sites and species
March 2022

The National Association for Areas of Outstanding Natural Beauty (NAAONB) is a charity that promotes the conservation and enhancement of natural beauty, and advances the education, understanding and appreciation of the public in relation to this, in and around Areas of Outstanding Natural Beauty (AONBs), other Protected Areas, and those landscapes for which designation might be pursued.

In addition, the NAAONB promotes the efficiency and effectiveness of those organisations promoting or representing AONBs, other Protected Areas and those landscapes for which designation might be pursued. Its membership comprises AONB partnerships, local authorities, private sector bodies, and individuals with an interest in promoting the aims of the NAAONB.

A number of AONB partnerships¹ may have responded individually to this consultation and the comments of the NAAONB should be seen as supportive and supplementary to these.

15% of England is designated as Area of Outstanding Natural Beauty, whose primary purpose is to conserve and enhance natural beauty.

The selection of areas to be designated as AONBs within the 1949 National Parks and Access to the Countryside Act placed great importance on the conservation of wildlife, these areas were seen to be important for biodiversity and scientifically valuable.

We reject any suggestion that the designation per se is failing nature. It is land use, driven by policy and the market, along with weak regard for negative impacts and a failure to enforce, which has driven nature decline. The National Association has submitted a detailed response to the recent Government consultation on the Landscape Review which demonstrates how AONB could deliver on both the historic aims for protected landscapes and the aspirations within the 30 x 30 commitment.

In order to fulfil the Government's aim to be the first generation to leave the environment in a better state than we found it we need well-resourced teams within the protected landscapes with the purposes, powers and governance to deliver for nature, climate and people – looking forward, but built on the legacy and learning from 70 years of AONB.

¹ AONB partnerships, with a lower case p, is the generic term used by the NAAONB to refer to AONB Partnerships, Conservation Boards and any other organisation recognized as the lead governance body for an AONB.

**The National Association for
Areas of Outstanding Natural Beauty**

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Introduction

Set against a backdrop of unprecedented concern for the future of the natural world, and intergovernmental reports that the current global response to the effects of human impact on nature is insufficient – the National Association for Areas of Outstanding Natural Beauty believes that now is the time to significantly increase the scale and pace of nature conservation activity in AONBs. Using our unique network and partnership model, we made a collective Declaration on Nature in AONBs, the Colchester Declaration, setting out our strategy for change. With many AONB host authorities having taken the step of declaring a Climate Emergency we have demonstrated our readiness to act to redress declines in species and habitats within the context of a wider response to climate change.

Internationally the IUCN has demonstrated that Effective Protected Areas (e.g. those with robust protection, effective management, appropriate governance, adequate financing etc.) are proven to be successful for safeguarding nature: they are the front line of defence against growing pressures from human activity and climate change and are vital for securing the future of some of our most important species and habitats, particularly when integrated into wider landscapes and seascapes that are also well managed for nature. These are the places where many of our most rare, vulnerable and most charismatic species have remained, within which they need to be protected, and from which they can be recovered and restored to the wider countryside.

Areas of Outstanding Natural Beauty are listed as Category V Protected Landscapes under IUCN definitions:

“A protected area where the interaction of people and nature over time has produced an area of distinct character with significant ecological, biological, cultural and scenic value: and where safeguarding the integrity of this interaction is vital to protecting and sustaining the area and its associated nature conservation and other values.”

The primary purpose of the AONB designation as provided for in the 1949 Wildlife and Countryside Act is to ‘conserve and enhance natural beauty.’ A series of legal decisions and policy statements since this date have made it clear that the phrase ‘natural beauty’ is not just scenery but includes landform and geology, plants and animals, the historic environment and cultural heritage.

The selection of areas to be designated as AONBs placed great importance on the conservation of wildlife. Their proposed name in the Hobhouse Report (to the Ministry of Town and Country Planning) which preceded the 1949 National Parks and Access to the Countryside Act was ‘Conservation Areas’. Julian Huxley who sat on the Hobhouse Committee and chaired the Wildlife Conservation Special Committee which reported on these areas in 1947 stated,

‘We agree with the Nature Reserves Investigation Committee and with the British Ecological Society in attaching the greatest importance to the Conservation Area [AONB] as a means of supplementing with the least interference and expense the small range of conditions which have been included in the proposed list of National [nature] Reserves’ (WCSC 1947, p. 22).

He went on to explain how these areas would provide protection for many important plant and animal communities which required a scale larger than a nature reserve, citing habitats such as chalk downland which required the continuance of disturbance factors. Large areas of chalk downland including the North Downs, Chilterns and Cotswolds were listed as potential Conservation Areas in the 1947 Hobhouse Report and have since been designated (as AONBs).

Although the term 'natural beauty' is used in legislation, Huxley is clear, 'the conservation of scenic beauty is intimately bound up with the conservation of wildlife and physical features' (WCSC 1947, p.23). It is the combination of these factors that was expressed as 'natural beauty' in legislation.

It was not just scientific interest that underpinned the importance of wildlife in AONBs, Huxley was also conscious of its value to people, '... part of the enjoyment to be derived from [National Parks and AONBs] is attributable to the ability to observe wildlife of all kinds at relatively close quarters in its natural surroundings' (WCSC 1947, p.10). These areas were seen to be biodiverse and scientifically valuable.

Sadly, another key recommendation from Huxley's report - that a survey and identification of features of scientific interest be carried out for Conservation Areas [AONBs] and National Parks - was not implemented. If it had been, we would have a baseline today against which to monitor biodiversity change.

None of this is to dispute that biodiversity is in a perilous state within and outside designated areas, but it does demonstrate that these areas were seen as valuable for wildlife in 1949 and are likely to retain the potential to be so again.

AONBs remain important areas for wildlife; despite covering only 15% of England they hold 25% of England's SSSIs, 24% of England's most important wildlife habitats, 20% of England's total woodland cover and 30% of England's Ancient Woodlands. They include important areas of upland peatlands and lowland wetlands which in addition to their biological richness have a critical role in carbon sequestration and water management.

Given their importance for both wildlife and public engagement with the natural world, greater emphasis should be put on restoration of natural processes, looking at more holistic and regenerative management practices to deliver on the Glover/Landscapes Review recommendation that protected landscapes should form the backbone of the Nature Recovery Network.

In our recent submission to the Government's consultation on the Landscape Review we recommended that Proposal 24 of the Glover Review should be implemented: 'AONBs be strengthened with new purposes, powers and resources, renamed as National Landscapes'. This would be a significant step in the direction of making AONBs meet the requirements of 30 x30.

Purposes: The extension and revision of purposes to reflect contemporary priorities for AONB. Natural beauty with a strengthened link to nature recovery on a landscape scale and the importance of cultural heritage. A second purpose to support sustainable communities and promote understanding and enjoyment of the area.

Powers: Catalyse the shared endeavour which delivering for nature, climate and people demands by strengthening the 'duty of regard' linked to strengthening the status of the Management Plan. A formal role in planning and development management to better deliver on the purposes.

Resources: Secure core team activity through a dynamic and progressive funding formula which reflects ambition and future needs. A strong core which can attract the partnerships and finance to boost delivery and impact.

Governance: A robust minimum governance standard which provides sufficient independence to guarantee the integrity of the designation, dynamic and more representative of the wider UK population.

Case Study – Cotswolds AONB

The Cotswolds Nature Recovery Plan was adopted in 2021

The current extent of important biodiversity habitats was calculated from mapping based on a refresh of the national habitat layers using interpretation from recent satellite imagery. This gave a current habitat extent of 23% of the area of the National Landscape. The area of arable including agri-environment measures was found to cover a further 19% giving a total extent of 42% the area arguably supporting nature recovery in some way.

Target extents for 5-year intervals to 2050 were then calculated. The final extents for 2050 were 40% of the Cotswolds area for important habitats rising to 93% including arable with environmental measures. The target extents for 2030 are 32% for important habitats and 54% including arable with environmental measures.

The scientific advice indicates that 30% of a landscape should comprise of good habitats across a landscape to provide sufficient connectivity. One paper cites 40% in protected landscapes although this may be a reflection of the higher proportion of habitat in upland landscapes. (References are included at the end of this comment) It may be prudent to consider 30% in lowland landscapes and 40% in upland.

As the important biodiversity habitat figure is over 30% it could be argued that if delivered on schedule the Nature Recovery Plan will have made sufficient progress to provide justification for the inclusion of the Cotswolds National Landscape towards 30 by 30. The inclusion of arable land in environmental measures would further strengthen this case however for this purpose the methodology would require reviewing to narrow it down to arable measures specifically intended to deliver outcomes for biodiversity.

There is much detail in the plan that would also need to be delivered for these figures to have meaning, particularly with reference to the quality and connectivity of habitat. Additionally, much will have to go as we hope if these targets are to be realised, not least the delivery of funding mechanisms to support nature recovery such as ELM, BNG and PES (Payment for Ecosystem Services).

References: Documents citing the 30% & 40% extent requirements:

Stand-alone summary primer for the rebuilding biodiversity methodology. South West Biodiversity Partnership.

Henrik. A. Oikos 1994 Effects of Habitat Fragmentation on Birds and Mammals in Landscapes with Different Proportions of Suitable Habitat: A Review. Defining and delivering resilient ecological networks: Nature Conservation in England.

Isaac. N.J. et al 2017. Journal of Applied Ecology.

Digging Deeper: Wildlife and Countryside Link. September 2021.

Questions

19. What are your views on our proposal to establish priority areas for afforestation?

We recognise that providing priority areas for afforestation would provide clarity for land managers and streamline the currently complex application process for tree planting. However, it would seem sensible to combine this aspiration with the developing Local Nature Recovery Strategies which will be looking at many of the same data sources and include many of the same consultees – tree planting is a vital part of nature recovery within the UK but only when assessed as part of a holistic nature recovery strategy.

30 by 30 (page 17)

20. What are your views on our proposed criteria to achieving our 30 by 30 commitment? We are keen to hear views on the proposed approach for assessing Protected Areas set out under 4.1 and suggestions for areas of land we should consider as OECMs in England under section 4.1.0

We recognise that the designated landscapes are not currently able to deliver against the 30 x 30 commitment in full, but, as detailed above, believe that a number of modest and uncontentious changes to the resources, powers, purposes and governance of AONBs would enable them to deliver for our international responsibilities

21. What are your views on our proposal to reform forestry governance and strengthen protections for the Nation's Forests? We are keen to hear views on any additional powers and statutory duties we should consider that would help to deliver on the benefits of woodland beyond timber production.

We would welcome the potentially enhanced emphasis on biodiversity in management of the national forest resource and would be interested in more details of how this could be achieved. Better interpretation and enforcement of existing UK Forest Standard guidance would be a good first step. Within designated landscapes working with the Management Plan process could be a means of ensuring best fit for woodland management. As mentioned above, the developing Local Nature Recovery Strategies could act as a guide to the development and management of woodlands which would deliver on both nature and climate aspirations

22. What are your views on our proposal to adjust forestry permanency requirements for certain project types?

Currently tree planting results in a permanent land use change and acts as a barrier to many who may have wanted to plant trees but worry about the long-term consequences. We support moves to tackle this concern and would be interested in further discussion on how this could be achieved. Using either a Permitted Development Rights model or effective mapping of existing resource (using National Forest Inventory or similar mapping) would offer a means to differentiate existing, and therefore protected, trees from new planting.

Within designated landscapes, if effectively resourced, the Management Plan process could also be a means of differentiating between existing and new planting.

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