

## NAAONB Written Evidence to House of Commons Environmental Audit Committee inquiry on The Future of the Natural Environment after the EU Referendum

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 partnerships<sup>1</sup> have responded individually to the call for evidence and the comments of the NAAONB should be seen as supportive and supplementary to these.

### Executive summary

Existing agri-environment schemes have had limited success in conserving and enhancing natural beauty. Brexit presents a key opportunity to deliver a step change in nature conservation, as set out in the Natural Environment White Paper.

Any new scheme should be designed to reward positive environmental management, especially for goods and services that have no economic market, such as natural beauty. Furthermore, the historic and cultural landscapes should not be excluded from any new scheme. Basic environmental management which simply meets legal requirements should not be supported economically. We recommend a precautionary approach whereby the conservation of natural capital, and particularly the derived landscapes and natural beauty, are prioritised.

Long term financial security for land managers and for the conserved and enhanced landscape should be a key tenet of any new scheme along with robust monitoring and fit-for-purpose application, claim and payment processes.

<sup>1</sup> 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.

With locally adopted and regularly reviewed statutory Management Plans, the AONB Family is ideally placed to help in future prioritisation and delivery of schemes at a landscape scale. Furthermore, there should be continued support for LEADER and Sustainable Development Funds, to help ensure the vitality of rural communities.

If there is to be any divergence in policy between nations of the United Kingdom, it should reflect the inherent differences in the climatic and topographic regions of the UK. Ecosystems do not respect political boundaries and national policies should be designed to work at an ecosystem scale.

The best returns for a rewilding approach would occur where there is little current biodiversity or cultural interest. Rewilding is by no means a solution that fits all landscapes and losses could exceed the gains in many locations.

Areas of Outstanding Natural Beauty (AONB) are designated under the National Parks and Access to the Countryside Act 1949 and cover approximately 18% of land area in England, Wales and Northern Ireland. The purposes of the AONB designation were updated and conferred by the Countryside Commission in 1991 as follows:

- The primary purpose of the designation is to conserve and enhance natural beauty.
- In pursuing the primary purpose, account should be taken of the needs of agriculture, forestry, other rural industries, and the economic and social needs of local communities. Particular regard should be paid to promoting sustainable forms of social and economic development that in themselves conserve and enhance the environment.
- Recreation is not an objective of designation, but the demand for recreation should be met, so far as is consistent with the conservation of natural beauty and the needs of agriculture, forestry and other uses.

The Countryside and rights of Way Act 2000 confirmed the significance of AONBs and created improved arrangements for their management. There are three key sections of the Act for AONBs:

- Section 85 places a statutory duty on all 'relevant authorities' to have regard to the purpose of conserving and enhancing natural beauty when discharging any function affecting land in AONBs.
- Section 89 places a statutory duty on local planning authorities to act jointly to produce a Management Plan for each AONB in their administrative area.
- Section 90 describes the notification required during the AONB Management Plan-making process.

In June 2000 the Government confirmed that the importance and protection of AONBs are equivalent to those of National Parks.

In response to the consultation questions, the NAAONB wishes to highlight the following points:

1. **What are the implications for UK biodiversity of leaving the EU, in particular the Common Agricultural Policy? To what extent do initiatives to support biodiversity in the UK depend on CAP-related payments? What risks and opportunities could developing our own agri-environment policy and funding present?**

1.1. CAP funded agri-environment schemes play a significant role in the conservation and enhancement of natural beauty in our designated landscapes, securing valuable and popular public goods from private land that without a good replacement grant scheme would otherwise be difficult to achieve. However, they have not achieved their intended outcomes, and the vitality of the countryside and landscape quality is still in decline. The recent DEFRA publication 'England Natural Environment Indicators'<sup>2</sup> supports this assertion, stating that the farmland bird index is at its lowest recorded level; the woodland bird index is 23% lower than 1970 levels; farmland butterfly populations have fallen 27% since 1990 and populations of 213 priority species have declined 33% compared to 1970 populations. Indeed, four of the nine wider countryside indicators are in decline, two are no change and only three are improving. There is no mention in the report of habitat extent and quantity, but again statistics for this would support our argument that current incentives do not go far enough. For example, in Dorset over the past 80 years, 97% of all semi-natural grassland has been converted to intensive grassland or arable land use. A significant risk in post-Brexit negotiations is that these schemes are replaced with like-for-like alternatives and this steep decline continues.

1.2. The UK leaving the EU presents an opportunity to look afresh at government support for conservation and for the farming community. Any new schemes should be designed to reward positive environmental management, and not just ensure that no harm is done. Any new scheme should also focus on management which provides environmental goods and services that are not traded on the open market. Basic environmental management which simply meets legal requirements, such as buffers from watercourses, should be a mandatory requirement of land ownership unsupported by subsidy. A significant risk that would require careful management is that our understanding of the value of these goods and services is in its infancy and therefore may be undervalued. This would result in any incentive scheme not being attractive enough to bring about the required changes to reverse the trend of a declining natural environment. We recommend a precautionary approach whereby the conservation of natural capital, and particularly the derived landscapes and natural beauty, are prioritised.

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<sup>2</sup> <https://www.gov.uk/government/statistics/england-natural-environment-indicators>

Furthermore, we believe that funds should not be solely focused on supporting the agricultural sector, but be open to all land owners undertaking positive environmental management, including government departments, conservation organisations and Local Authorities. Therefore 'agri-environment policy' is a misnomer and should be broadened to encompass the wider environment.

- 1.3. Leaving the EU also poses a risk to the integrity of our international sites system. Existing European and international designations are reflective of areas of high conservation value. Ensuring the ongoing protection of their designated features and the wider integrity of the site is vital in order to maintain quality habitat from which to restore natural ecosystems across wider areas, consistent with the approach suggested by Sir John Lawton.
- 1.4. In addition there are numerous pieces of UK legislation, guidance and initiatives which derive from, and seek to implement EU directives. It is critical that we continue to show leadership on the world stage in protecting our environment for future generations.
- 1.5. Any new scheme that rewards sustainable land management, along with conservation of the natural, historic and cultural landscapes, should align with replacement conservation directives, which deliver our international obligations. This approach would necessitate ongoing partnership with Europe.
- 1.6. A further benefit of existing agri-environment funding is that it can be used to lever in other funding for landscape-scale conservation activities, for example, through the Heritage Lottery Fund Landscape Partnership programme, and we would like to see this function continue. It is our view that the partnership and landscape based outcome-focused approach taken by HLF could be instructive and helpful to government when it considers how to frame future schemes.
- 1.7. There is a risk that any future agri-environment support schemes are too narrowly focussed. Any future scheme should focus on the full suite of environmental goods and services offered by the wider landscape, which includes the natural environment, but also the historic and cultural landscapes.
- 1.8. There are significant opportunities for developing our own agri-environment schemes and to showcase the UK as a leader in sustainable land management. We also see this as an opportunity to implement flexibility in delivery that meets local needs, robust monitoring that is outcome based rather than compliance based, and also fit-for-purpose application, claim and payment processes.
- 1.9. With locally adopted and regularly reviewed statutory Management Plans, The AONB Family is ideally placed to help in future prioritisation and delivery of schemes at a landscape scale. It is our view that the AONB and National Park management plans should be a key driver for future agri-environment funding and the AONB Family could lead in local grant scheme management. This approach

would naturally align with the Natural Environment White Papers ambition of a 'bigger, better, more, joined' natural environment. Furthermore, the holistic approach of protected landscapes will also ensure strong links to the historic and cultural landscapes and the communities who live in and around the landscape. We would welcome further discussions about the role of protected landscapes in the prioritisation and delivery of any future schemes.

**2. How should future support for UK agriculture be structured in order to ensure there are incentives for environmentally-friendly land management? What are the positives/negatives of current schemes (e.g. Countryside Stewardship) that should be retained/avoided?**

- 2.1. The Natural Environment White Paper - The Natural Choice, stresses that "what is needed is a step-change in nature conservation". Implementing a properly incentivised and resourced 'natural-environment' scheme is fundamental to achieving this. The scheme should not focus solely on agricultural holdings, but where the most benefit can be gained, be that on state owned land, nature reserves or other land holding types. The focus of any new scheme should be for delivery of environmental goods and services that are not traded on the open market; services such as flood storage, carbon sequestration, biodiversity and importantly the conservation and enhancement of natural beauty. Any future scheme should also support adaptation to climate change. The ambitions of any scheme should be to deliver at a landscape-scale and support landscape character and quality, ensuring delivery of wider biodiversity, cultural and heritage ambitions.
- 2.2. It is vital for the environment that the viability of rural economies is strengthened, and therefore it should be a priority of future schemes to support community-led initiatives that deliver appropriate processing, marketing and certification of locally grown products, along with sustainable tourism and business support, as combined they will create the conditions for sustainable land management to take place.
- 2.3. The existing LEADER programme has been successful and often delivered by or alongside AONB partnerships, in tandem with our own Sustainable Development Fund. The effectiveness of the programme could have been enhanced by simplified application and reporting processes. Ongoing support for LEADER and SDF funding along the principles of community-led local development would help support the vitality of rural economies.
- 2.4. One of the most significant benefits to landowners of the previous Higher Level Schemes was the commitment over a 10 year period, and this has been lost in the most recent review of agri-environment schemes. Future schemes should revert back to the long-term commitment for the delivery of environmental goods and

services and ensure the long-term landscape benefits are maintained post scheme funding.

- 2.5. Any future scheme should be based on up-to-date evidence, for example AONB Management Plans, and sound science. Future schemes should also support and resource better integration amongst wider delivery partners as well as land managers. This would minimise competition and allow delivery of multi-objective landscape scale programmes.
- 2.6. Future schemes should be more ambitious and focus on rewarding enhanced management, not just 'holding the line'. Payments for better soil management, better management of run-off, better nutrient management and pesticide application have all been funded under previous schemes. However, sustainable environmental practice in farming should not happen only when funded by government, but be a matter of course backed up by tighter regulation based on the 'polluter pays' principle. Ultimately, these actions are self-funded in that they reduce cost to the farm business.

### **3. How should future UK agri-environment support be administered, and what outcomes should it focus on?**

- 3.1. With locally adopted and regularly reviewed Management Plans, AONB and National Parks Families are ideally placed to help in future prioritisation and delivery of schemes at a landscape scale, aligning with the Natural Environment White Papers ambition of a 'bigger, better, more, joined' natural environment. Furthermore, the holistic approach of protected landscapes will also ensure strong links to the historic and cultural landscapes which, along with biodiversity, are characteristics of the landscape much valued by people. We would welcome further discussions about the role of protected landscapes in the prioritisation and delivery of any future schemes.
- 3.2. A priority for any new programme should be on delivery of environmental goods and services for which there is no adequate market. For example, the value of the UK's woodlands for timber in 2014 was estimated to be £5.2 billion, but this value is dwarfed by the value of carbon sequestration (£38.2 billion), air filtration (£69.3 billion) and recreation (£54.9 billion)<sup>3</sup>. However, there are currently limited mechanisms for supporting the management of the woodland resource, other than through selling of timber. For services where there is no current market at all, such as natural beauty, there is a risk that conservation will be neglected. However, these services are very much valued by the wider public. For example, following public consultation, National Grid have earmarked £500 million to remove infrastructure that have the biggest visual impact within AONBs and National Parks.

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<sup>3</sup> <http://www.ons.gov.uk/economy/environmentalaccounts/bulletins/ukenvironmentalaccounts/2016>

- 3.3. We are particularly keen to see prioritised the support of measures that enable conservation and enhancement of natural beauty and other uneconomical environmental services
- 3.4. We also believe that any new programme should support the growing emphasis on mitigation of and adaptation to climate change. We are also keen to see, in tandem with conservation and enhancement of natural beauty, High Nature Value farming appropriately supported through any future schemes and support the High Nature Value Farming manifesto<sup>4</sup>.
- 3.5. Scheme outcomes should focus on:
  - Maintaining, conserving and enhancing landscape complexity, including historic and cultural elements,
  - Achieving climate change adaptation and resilience,
  - Safeguarding carbon in upland peat soils,
  - Encouraging carbon sequestration from restored wet heath and woodland creation,
  - Protecting communities through lower flood risk and better water storage,
  - Improved water quality and riparian habitats through erosion control/ecosystem buffering, and
  - Delivering ecosystem/biodiversity function at landscape scale

**4. What are the prospects and challenges for future environmental stewardship schemes in the devolved administrations? How much divergence in policy between the nations of the United Kingdom is likely? How can divergence be managed?**

- 4.1. If there is to be any divergence in policy it should reflect the inherent differences in the climatic and topographic regions of the UK. Ecosystems do not respect political boundaries and national policies should be designed to work at an ecosystem scale. Upland Shropshire has more in common with upland Wales than coastal Norfolk. Therefore environment schemes should be tailored to fit local needs, and national policies should be designed to reflect this. Cross-border protected areas, such as the Wye Valley AONB, should be prioritised for involvement in any consultations on scheme divergence.

**5. What are the future risks and opportunities to innovative land practices, such as managed rewilding? What role can rewilding play in conservation and**

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<sup>4</sup> <http://www.highnaturevaluefarming.org.uk>

**restoration of habitats and wildlife? What evidence is there to support the incentivising of such schemes in any new land management policies?**

- 5.1. Rewilding has not been tightly defined and can mean many different things. An agreed definition is one of the first things required to allow a more meaningful debate. Our preferred definition would lean towards a landscape that has a depth of trophic levels (including apex predators) with functioning underlying ecological processes that would not be achieved at smaller scales or through simple non-intervention.
- 5.2. The best returns for a rewilding approach would occur where there is little current biodiversity or cultural interest that may be lost. Rewilding is by no means a solution that fits all landscapes, and losses could exceed the gains in some places, for example the cultural landscapes of the Dorset heaths would not benefit from 'complete' rewilding as this would lead to a loss of the iconic heathlands and legally protected species. Extensive management of this landscape is being pursued to ensure these features are retained in a sympathetic manner, which should be considered as being on a 'rewilding spectrum' and should continue to be supported through any new agri-environment programme. Furthermore, support for sustainable management of the wider landscape matrix should not be abandoned in favour of a specific rewilding approach focussed on a geographically limited area.
- 5.3. Any rewilding requires long term commitment (multiple decades) that is beyond that available through agri-environment schemes. If successful, rewilding would lead to the designation of sites and this would place obligations on the owners to ensure sustained management, perhaps without the support of agri-environment schemes.

**This response has been compiled by Ian Rees, Countryside Officer, Dorset AONB Partnership, on behalf of the NAAONB.**

**9th September 2016**