

Peak District National Park Authority

Response to the Landscapes review: call for evidence

Part 1 - Opening thoughts

The following photo was submitted with our response to help illustrate what makes the National Park special to us.



Credit to Joe Bawden and Dave Longbottom

We would like any opening thoughts on the role played by National Parks and AONBs - you may want to make a more detailed suggestion further on.

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.

It is no co-incidence national parks celebrate our 70th year anniversary just a year after the National Health Service. Both were born from a moment of societal change to re-build Britain after the war: to care for the health of the nation with the NHS; and, to retain our treasured landscapes for the well-being of the nation.

Our founding legislation was borne from two great campaigning movements from here in the Peak District. From people living in the industrial cities surrounding the Peak District campaigning for a right to access and enjoy the countryside; and, from a group founded by Ethel Haythornthwaite in Sheffield campaigning for the countryside to be fit for returning war heroes and an early pioneer of Campaign for the Protection of Rural England.

There is much to celebrate from the past 70 years. We want to achieve so much more. We hope this review becomes the spark to re-awaken this sense of public support for National Parks to be accessible for all and to inspire care in everyone for the countryside.

National Parks are designated because of their spectacular landscapes, wildlife and cultural heritage offering a breathing space for learning, discovery and enjoyment for the nation. The special qualities of these landscapes are what make them important and part of a globally recognised designation. The **seven special qualities** of the Peak District National Park are:

- Beautiful views created by contrasting landscapes and dramatic geology
- Internationally important and locally distinctive wildlife and habitats
- Undeveloped places of tranquillity and dark night skies within reach of millions
- Landscapes that tell a story of thousands of years of people, farming and industry
- Characteristic settlements with strong communities and traditions
- An inspiring space for escape, adventure, discovery and quiet reflection
- Vital benefits for millions of people that flow beyond the landscape boundary

We work to conserve and enhance this distinctive sense of place for current and future generations to enjoy, not to preserve a landscape frozen in time.

The **dual purposes** of National Parks work well together because they create a virtuous cycle: by conserving and enhancing, we create opportunities for people to enjoy nature and the countryside; and, by enjoying people will be inspired and moved to care for the landscape.

Our **duty to the communities who live and work** in the National Parks works well as a duty and is key to this virtuous cycle because supporting the sustainability of these communities mean these landscapes have future custodians.

As National Park Authorities we deliver these purposes and duty as **a regulator, an influencer and through delivery on the ground**. We act as a convenor for the place and in partnership with people in developing **National Park Management Plans**. These plans set the framework for everyone to work together to achieve National Park purposes.

Our **skills** as National Park Authorities are how we:

- Look at the landscape scale, while valuing and caring for the detail
- Keep it a living place, while maintaining what gives the landscape its special qualities
- Care for a public asset, which is largely in private ownership
- Acknowledge often polarised views, while seeking harmonious outcomes
- Focus on caring for the place, while looking beyond the boundaries of the landscape.

The **legal and regulatory planning** framework that governs National Park Authority operations facilitates the delivery of our purposes and duty; in seeking to improve and do things better we wish to maintain what is good about this framework. For example, being

the local planning authority enables us to develop and ensure a consistency of approach to planning policy and decision making across the whole of the National Park.

It costs every taxpayer less than £1 per year to support the 10 English National Parks in their work to speak up and care for these finest landscapes for all to enjoy forever.

We would like to ensure we have the best policy levers available to achieve our aspirations for the nation's finest landscapes; and for all public money spent here to enable the nation to achieve the purpose of inspiring care in everyone so National Parks are accessible to all and a working model for a sustainable future.

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.

The legislation setting up National Parks, and subsequent government policy and guidance, created an approach to caring for these landscapes with a focus on convening and harnessing support by consensus-building. Consensus-building creates sustainable outcomes, it takes investment in time and trust and can lead to negotiated outcomes that may not always support keeping the best the best.

We are at a time now when the pressures on landscapes, natural heritage, cultural heritage and the ability to access them are greater than they have ever been. Our challenge is how to maintain our role as independent convenors of the place (as peace-makers as well as place-makers) and at the same time use our voice to achieve positive and active change (as change-makers).

There is potential to work better within, and across, the network of UK National Parks and other designated landscapes. There is potential to better tell the story of protected landscapes to stimulate support and love of National Parks and reignite the passionate fight for caring for these landscapes for all – no matter what age, social background or creed.

Areas to work better together in pursuit of National Park purposes:

1. **Our governance:** for the member appointment process to help deliver a greater diversity in our members to better represent wider society and for our boards to be more agile and fit for the size of the organisations we are.
2. **Our relationship with constituent and neighbouring authorities**, such as local authorities, combined authorities, local enterprise partnerships and strategic transport bodies, to garner a better understanding, appreciation and support of national park purposes and to seek opportunities to work together to support the deeply rural communities represented by national parks.
3. **National policy:** to provide the best policy levers to achieve our aspirations for the nation's finest landscapes and for public money spent in protected landscapes achieves their purposes and secures a sustainable future.
4. **Working together across the national parks/protected landscapes network:** to work more closely and collaboratively across the 15 UK national parks, and all protected landscapes, to generate a sense of shared understanding, support and working together.

Part 2 - Views

We'd like to hear views on particular issues.

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

National Parks are reservoirs for biodiversity and without protection and financial resource these areas would have suffered biodiversity losses at a pace similar to areas in the wider countryside. However, National Parks have not been, and are not, immune to losses. Only a third of the Peak District National Park is protected by a nature conservation designation, most of which is the moorland of the Dark Peak and South West Peak. This leaves many of our grassland habitats unprotected, where habitats of quality are much more restricted with little or no connectivity between them.

There are no additional tools or powers within National Parks to succeed fully with protecting and enhancing biodiversity. The Peak District State of Nature Report 2016 shows major loss of habitats and species over recent decades especially for flower-rich grasslands, including lead rake grasslands and limestone heaths, plus dew ponds. These losses are generally lower than in surrounding rural counties but still significant and are leading to a dwindling of the special qualities of the National Park.

Our natural heritage is inter-linked with cultural history and the landscape, because habitats are the product of peoples' past and present interaction with the landscape and their management decisions. So habitat loss leads to a diminishing of landscape and cultural heritage.

The main tool for the conservation and enhancement of priority habitats outside of nature conservation designations is the agri-environment schemes. Yet we are seeing a progressive decline in coverage of such schemes in the White Peak from approximately 87% coverage in March 2014 to a current level of around 50%. The upper tier schemes are crucial because it is only these that achieve positive enhancement, lower tier schemes are more about stabilising what has been lost.

Our only regulatory function is planning in relation to development that may affect nature conservation or biodiversity interests. Aside from removal of some Permitted Development Rights, National Parks do not have any additional planning protection for nature conservation and biodiversity compared to areas outside National Parks. The Agricultural Environmental Impact Assessment Regulations thresholds are lower in National Parks and are intended to prevent agricultural improvement of priority habitats. The regulations have been recently revised to better protect priority habitats and cultural heritage in protected areas, but are as yet untested. These regulations are enforced by Natural England, with limited resources to deal with potential breaches.

As a National Park Authority, we operate at the landscape scale - bringing together organisations, specialists, farmers, land managers and land owners so change is bigger, better and more joined up – and with the small details - providing an integrated conservation service to individual land managers across the National Park through planning and farm advice.

The best example of achieving landscape scale change is the highly successful Moors for the Future Partnership. For 15 years this partnership, led by the National Park Authority, has been restoring some of the most degraded blanket bog in Europe, turning back the clock on 200 years of degradation from industrial pollution to bring back life to the Dark Peak moors. These moors, which are also designated as SSSIs, SACs and SPAs, are

critical in helping our environment to be resilient to climate change, providing ecosystem services through carbon storage and water supply, slowing the flow of water from the moors, retaining soils, revegetating bare peat and encouraging biodiversity of flora and fauna. More recent partnerships include the South West Peak Landscape Partnership and White Peak Partnership.

Partnerships are also important in tackling polarised issues, an example being the Peak District Birds of Prey Initiative which aims to address the continuing absence of healthy breeding populations of birds of prey in the moorlands of the Peak District National Park. Dealing with polarised issues takes an investment of time, trust and commitment between all partners to achieve sustained, long-term, enhancements.

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

Our 5 year Corporate Strategy for 2019-24 sets out our ambition for distinctive landscapes which are sustainably managed, accessible and properly resourced and high quality habitats in better condition, better connected and wildlife rich. We are aware that despite our good work, and that of our partners, some valuable natural habitats and important species have been declining. National Parks have huge potential as key reservoirs for wildlife, but to realise this potential National Park Authorities and our partners need further tools to make sustained progress in the following key areas.

To help deliver more for nature conversation in our finest landscapes we need:

1. Continued government **funding for peatland restoration.**
2. A new **Environmental Land Management Scheme for all land managers** that is outcome-led, simple, flexible, accessible, paying adequate rates to encourage uptake and based on the principle of public payment for delivery of the full range of public goods. It must be accompanied by a clear and central role for National Park Authorities in influencing how and where this money is spent to ensure that the best outcomes are achieved in National Parks. Please see response to question 11 below for more detail.
3. **More effective EIA regulations** for agriculture and forestry that are effectively enforced and so cannot be ignored and to have lower thresholds in National Parks to cover all boundary removal (walls and hedges) and small land parcels because these are often where the most interest lies.
4. **A broader understanding of what rewilding** means (what it is and is not) in National Parks – the term rewilding polarises people rather than brings them together behind a common purpose. We seek a better conversation about bringing wildlife into our landscapes that is about re-establishing naturally functioning ecosystems and nature recovery areas where people who have cared for the landscape have a place. We see National Parks as demonstration sites to explore options and opportunities. .
5. To support an approach to **management of upland moorland** where grouse shooting has a sustainable future alongside healthy population of birds of prey; where grouse moors are managed less for the numbers of grouse shot and instead the cost of a day on a grouse moor is also for enjoyment of the moorland experience, seeing birds of prey, enjoying heather in bloom and experiencing wildlife.
6. More **joined up working across our protected landscapes of National Parks and AONBs** to provide a more strategic approach to biodiversity networks and resilience. We already have working groups considering this across our professional officers and would welcome engagement of Natural England in considering the scope for National Parks and AONBs to be a key part of the Nature Recovery Network.
7. **Main-streaming the value of natural capital and cultural capital and ecosystem services into economic regulatory frameworks.** Ofwat's economic regulatory framework recognises this value by allowing water companies to fund catchment solutions and flood risk management decision making supports funding natural flood risk management solutions. This generates support for land management solutions that restore high quality habitats because it is good for water quality and flood risk management. Ofgem also recognises customers are willing to pay for undergrounding high voltage lines to enhance the landscape, with a significant Visualisation Impact Programme underway. However, there is currently no effective economic regulatory regime that recognises the value of blanket bog restoration to carbon sequestration which can fund this as a crucial activity to mitigate climate change; and there is no significant economic decision making tool to support the value of the natural health service provision from spending time in the countryside to preventative healthcare.

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

Our National Parks are living landscapes that have been shaped by people for thousands of years. The Peak District National Park has one of the richest concentrations of prehistoric monuments in the country, with many stone circles, burial mounds and settlements. At a national scale most of the highest densities of schedule monuments fall within National Park boundaries.

Our 5 year Corporate Strategy for 2019-24 sets out our ambition for a cherished cultural heritage that is better understood, looked after and enjoyed for distinctive landscapes which are sustainably managed, accessible and properly resourced.

National Park Authorities hold a key role in shaping the landscape and natural beauty of these special areas. We do this primarily through our regulatory planning role, which provides a crucial “backstop” to our conservation and enhancement purpose, and through our advisory services from specialist officers. We also use our planning function in a positive and pro-active way, seeking to achieve enhancements to the landscape of the National Park whenever possible by managing change through the development process. High quality design and attention to detail underpins the development management work of all National Park Authorities; our planning role is vital in this and should not be reduced or undermined in any way, particularly through further deregulation of planning. Ensuring that development is in the right place and is of the right scale and design is at the heart of the planning process in National Parks. This also ensures that we look after the cultural heritage of the National Park, which is rich in human history.

We also help to protect and enhance our cultural heritage through the support and advice we give on land management schemes, such as large estate management plans, partnership conservation plans, guardianship sites and agri-environment schemes. Our support to local communities and groups also plays a vital role helping communities cherish and protect heritage that is dear to them.

The uniqueness of National Parks and the voice of National Park Authorities is our ability to speak for natural capital and cultural capital – we care for landscape, cultural heritage and natural heritage. No other place-based public body embraces all three and engages the public to enjoy and be inspired by their understanding of them and to pass this care onto others and to the wider world - so bringing a social capital benefit as well.

To deliver more for cultural heritage we would welcome:

1. Working with Defra in the **promotion of a deeper understanding and appreciation of the cultural heritage** in our landscapes as a key to delivery of the Government’s 25 Year Environment Plan. In particular through the proposed local natural capital plans so cultural capital is integrated into frameworks of ecosystem services, as much as natural capital currently is.
2. The proposed new **Environment Land Management Scheme** to deliver for the cultural capital of these special landscapes, such as protection of traditional dry stone walls. To prevent the removal of any drystone wall the introduction of wall regulations should be considered. Maintenance of the walls and restoration could receive appropriate support through the new ELMs. National Park Authorities currently administer the Hedgerows Regulations and this role could be extended to cover the regulation of traditional drystone walls.
3. **A single, nationwide Historic Environment Record could offer significant benefits** – because the data and information that sits behind delivery of the schemes and plans above is critical to successful delivery.

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?

Around 84% of the total area of the Peak District National Park is farmed land. Farmers and land managers are essential for conserving and enhancing the special qualities of the National Park. Our National Parks should be the finest landscapes for the nation with enhanced beauty, natural heritage, cultural heritage and access. So rather than being a place for intensive agriculture, National Parks must be places that encourage land management that reflects a National Park's status and purposes.

Farms must be sustainable and resilient businesses to survive. Decision-making is mostly driven by economic pressures. If farmers are to be encouraged to support National Park purposes and deliver more environmental and public benefits they need to be supported. There needs to be a way for the fundamental values of cultural, social and natural capital to be part of the decision making.

We want to ensure land management in the Peak District National Park delivers the full range of benefits, encouraging farmers to protect and enhance the natural and cultural environment and enhance public access to it. We would like to see more trees, more native woodland to match soils and geology, more scrub and ponds restored, more wildflower grassland of various sorts, protected lead mining remains, more limestone heath, and our cherished drystone walls to be rebuilt and restored. This would all enhance the ecosystem services, carbon capture, water quality protection, flood management, soil protection, amenity, cultural services and nature conservation values; a much better landscape for health and welfare because more bird song, butterflies and flowers have been shown to increase wellbeing for those using the landscape. This also requires support for increasing access to the countryside, for example supporting public rights of way, key linkage routes to open access areas and new access to water and watersides.

We support a future land management support scheme that delivers public payment for public goods and which underpins the whole future of farming and land management. It needs to be attractive to farmers to enter, since current schemes are not due to complexity, increased recording requirements, inadequate and late payments. While there is uncertainty about the future level and type of funding support to farmers after our exit from the European Union this is an opportunity in a lifetime to influence new schemes to pay farmers and land managers to conserve and enhance the special qualities of the Peak District National Park.

To help deliver more for our finest landscapes:

1. The National Park should be a **test-bed for new and innovative support schemes** which care for and enhance the special qualities of the Peak District National Park
2. A clear and **central role for National Park Authorities in influencing how and where the new Environmental Land Management Scheme is directed** and spent to ensure that the best outcomes are achieved in National Parks; whilst the Authority need not be the “purse-holder”, it should have a role in where and how public money is spent in the National Park.
3. The **2014/15 level of RDP funding in to the PDNP**, £30 million/year, will be needed and redirected in full for the delivery of public goods.
4. Currently annual payments are calculated on the basis of income forgone and additional costs which are nationally assessed and so often do not reflect local circumstance, actual productivity or indeed the public value of the public goods being delivered. This is particularly relevant in the White Peak. We will work with Defra to trial our White Peak Pilot idea as an example of **new ways to deliver an ELMS to address the local circumstances and needs**, whilst at the same time working in a complementary way with other rural development support initiatives, and we stand ready to work to deliver this pilot with partners.
5. There will need to be a **clear link between a future land management support scheme and the rural growth elements of the proposed Shared Prosperity Fund**. Farming and land management businesses will need to be resilient and sustainable and this will often involve farming operations becoming more efficient and diversifying enterprises. So these businesses will need to access these rural development funds in a simple way which dovetails with land management support

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

Promoting opportunities for understanding and enjoying the Peak District is already at the heart of what we do. The government’s 8 Point Plan for National Parks and the 25 Year Environment Plan highlights the importance of engaging more diverse audiences and we are increasing our engagement efforts.

Our 5 year Corporate Strategy for 2019-24 sets out our ambition for a National Park loved and supported by diverse audiences. We have the benefit of significant physical assets that help us to achieve our desired outcomes. Our multi-user trails, visitor centres and historic estates are enjoyed by more than 700,000 visitors every year. We’re developing a suite of award-winning "Miles without Stiles" routes, with 20 routes published in 2018 and a further 20 this time next year. There are many opportunities for creating and improving accessible routes and we work closely with the Peak District Local Access Forum to achieve this. Where appropriate we use Traffic Regulation Orders to manage access and ensure impacts on routes are mitigated so they are available for all to enjoy safely for future generations.

The access and public rights of way network provides the means by which many people engage with the National Park. Responsibility for the network rests with the Highways Authorities. We work with the Highways Authorities who operate across the National Park,

but this is limited by a lack of funding and, at times, synergy between our aims and management of the Rights of Way network by the Highway Authorities.

The loss of public transport services within, into and across the National Park has restricted the ability for people to access the National Park via sustainable transport means, resulting in more people accessing by car, which limits the ability of those without a car to enjoy these national treasures. It also results in increase car traffic with subsequent challenges on air quality.

As well as maintaining physical access, there is work we do to overcome perceived barriers to access, such as a lack of confidence to explore and discover the natural world or cultural or social factors which may make people not feel safe or welcome. We want to ensure ease of access so people do not miss the benefits the National Park offers. We work to inspire those who do not feel they have a connection with the natural world and arouse their curiosity. We also want the enjoyment of the Peak District National Park to be at a scale and quality that respects the needs of all, and allows all to enjoy.

To help open up access and provide greater opportunities for recreation:

1. **More jurisdiction over the infrastructure that supports great National Park experiences** is needed. Transferring responsibility for the maintenance and improvement of this resource to the National Park, along with respective budget and legal powers, would enable us to make improvements with regard to access and accessibility.
2. **Support with the first/last mile transport challenges.** There are a number of key transport corridors across the National Park network, where the interchange experience could be significantly improved through greater partnership working between different transport operators, key visitor attractions and protected landscapes. For example, existing public transport options are available from Sheffield railway station to Chatsworth House and Bakewell, but it is confusing for the domestic visitor, let alone international visitors, to follow successfully. There is an opportunity for Government to make it easier to create joint ticketing solutions to key attractions in National Parks, which can be promoted to international visitors upon arrival in the UK.
3. Our location in the Peak District means working with Transport for the North and Midlands Connect. **We'd like strategic transport bodies to actively support the National Park's purpose to promote enjoyment and understanding.** This purpose is sometimes less well understood by such public bodies.

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

A sustainable community relies on social, economic and environmental factors. Peak District National Park residents live in an outstanding landscape with natural beauty, wildlife and cultural heritage. Combined with the relatively close proximity of large towns and cities around the Peak District, this makes the National Park an attractive place to live; but being an attractive place to live can exacerbate the issues of affordability seen in many rural areas. There are also difficulties of access to services, particularly given the limited availability and cost of public transport in the area. While many villages have a range of thriving local facilities, some find it difficult to retain their services, with health and social

care being particularly affected. With residents' age profile increasing, many need access to these services now more than ever. Unemployment rates are relatively low, however the range and value of employment and access to jobs can be a problem. An ageing population, with a potential reduction in working age people and an increase in elderly people, adds to this. Furthermore it is important to find opportunities for younger people, who wish to remain in their communities, to do so.

National Park Authorities are organisations who seek to be grounded in their local communities. We seek to fulfil our socio-economic duty through our planning policies, as a community enabler and in working with the District and County Councils who have the direct remit and resources to take action; but all public sector bodies need to work together.

Our planning policies aim to retain community facilities and services and where it is no longer viable to do so we look for alternative community uses. We have permitted the change of use of former pubs to shops and community buildings into community-run shops. We support such innovation of communities running their own services and work to help them share and learn from each other. Yet these services often emerge after the loss of traditional means of accessing services, like doctors' surgeries and public transport.

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

The National Park Authority believes that building strong connections between local people and the area in which they live can help to foster thriving, vibrant and sustainable communities.

Over the past four years we have increased our capacity working with communities and our 5 year corporate strategy for 2019-2024 sets out our ambition for thriving and sustainable communities that are part of this special place. We are working with parish councils and communities to develop our understanding of what makes a thriving, vibrant and sustainable community. Sustainable communities need suitable employment and services including schools, shops and health facilities and we need to continue to work with partners to explore new ways of providing these services. We aim to support communities in a way that conserves and enhances the Peak District National Park's special qualities.

We work through Parish Councils and community interest groups to build understanding, capacity and cohesion in these communities. The main asset the Authority has in this work is the expertise and advice it can offer to communities, sometimes bringing them together through events such as the annual Parishes Day or providing a range of initiatives, from a statutory Neighbourhood Plan, to non-statutory village plans, to advice or financial assistance on small projects. Previously, government financed us to run a Sustainable Development Fund for communities, but this stopped several years ago. It was an important fund delivering significant impact and we have re-prioritised a small fraction of the government's National Park Grant we receive each year to maintain this, albeit at a lower level.

For many people businesses form an essential part of their experience of the National Park, from large landed estates to small cafes and village shops. We are particularly supportive of businesses which promote opportunities for the understanding and enjoyment of the special qualities of the area by the public and see this as a vital component of the National Park's performance. We welcome opportunities for high value, low impact employment within sustainable locations which supports National Park purposes. Due to the close proximity of neighbouring towns the Peak District National Park is a net exporter of commuters, with about twice as many people regularly leaving the area for work as entering it. Retaining an element of locally based employment is important to the provision of services and the character of local communities. Working with partners we are

supportive of efforts to provide appropriate opportunities for local businesses within the National Park.

To this end, the Authority supported the formation of Business Peak District (BPD), which now has over 700 members; this seeks to act as a single voice for businesses in and around the Peak District and as a representative of their interests. Its vision is for a Peak District with a distinctive, high quality rural environment and an enterprising, growing and sustainable rural economy. The Authority continues to support BPD and we aim to enable local businesses to thrive in a way that is compatible with and, wherever possible, enhances the special qualities of the National Park on which so many livelihoods rely. We can provide an environment where new businesses can be established and existing businesses can modernise and evolve while conserving and enhancing the special qualities of the National Park and enriching the communities that live within it.

Digital connectivity, both mobile and broadband, is also of vital importance to Peak District Communities and businesses. A Peak District National Park-wide enhanced broadband/digital service delivered in innovative ways with communities has a role to play in accessing services, as these services are still only available in a consistent way in the larger towns and villages. The Authority takes a positive approach to the provision of both mobile and broadband networks, whilst seeking to protect the special qualities of the area, but more needs to be done by the providers to cover the more remote areas, adopting more sensitive and innovative approaches where necessary

Our work with communities relies on good partnership with the key public sector bodies with responsibility for economic and social development – the local enterprise partnerships, strategic transport bodies, and county and district councils.

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

a) Housing

Supporting National Park purposes and helping maintain the special qualities of the National Park does result in a unique constraint on development. This is why we need a proactive approach to addressing the housing needs of local communities in ways that add to the valued character of an area. The National Park Authority has long established and successful housing policies that aim to meet the Authority's statutory purposes and to support the provision of affordable local needs houses. Since 1994 the Authority's adopted planning policies have led to housing development that either conserves or enhances the special qualities of the National Park (through the conversion of traditional buildings or the redevelopment of brownfield sites) or that provides affordable local needs housing. The latter is achieved through an "exceptions" approach to housing, with 100% of houses on exceptions sites being affordable houses for local needs. The Authority considers this to be the most effective way of meeting these needs, particularly given the relative scarcity of suitable and available housing sites in the National Park.

We will continue to take a proactive approach to addressing the local need for appropriate housing in the Peak District National Park. We want to work together to grow our understanding of different housing products. We support community-led housing initiatives that recognise the importance of delivering affordable homes with the community at the heart of the development process. Finally, we want to attract appropriate levels of inward investment from Government and others that reflects the cost of building affordable homes in the Peak District National Park.

Looking at the wider housing pressures, the Authority has been very concerned that constituent authorities' housing targets, driven by OAN (objectively assessed needs) estimates, have placed a burden of expectation on the National Park Authority to accommodate some of their wider housing needs within the National Park in order to relieve pressure on those areas outside the National Park. This has led to unnecessary tension between the National Park Authority and constituent authorities on this issue. Whilst the Authority has been sympathetic to the difficulties this has placed constituent authorities under, the answer is not to meet these wider housing pressures in the National Park but to acknowledge these constraints when the housing targets are being set for the constituent authority areas. The Authority welcomes the protection given to National Parks, in respect of housing and major development, in the revised National Planning Policy Framework (July 2018).

Future opportunities to assist local needed affordable housing:

1. Government support for this approach, through clear planning policy and guidance, with clarity on the role of respective authorities in finding sites and getting them released, and through **support for rurally focussed registered housing providers** is essential.
2. The flexibility to **use funds collected through section 106 agreements and New Homes Bonus** raised by the constituent authorities to be used within boundaries of the National Park would also support this. Currently this is not possible.
3. The National Park Authority does not seek to be a housing provider, but it does need **the support, tools and flexibility of approach** required to support the delivery of affordable housing in appropriate ways for the National Park.

b) Transport

Transport Infrastructure: The Authority is concerned that major transport infrastructure schemes may be proposed in, around and through the National Park without significant weight being given to National Park purposes and the duty under section 62 of the Environment Act 1995 at the strategic outline planning stage. As a result of early engagement by the Authority we are now closely involved in the discussions on trans-Pennine road and rail proposals and are seeking to influence these at an early strategic development stage. The Authority's approach is to seek a clear justification for major proposals in the National Park and, if this can be demonstrated, to seek exemplar schemes that provide significant net environmental enhancement and to provide opportunities for sustainable transport options to promote enjoyment of the National Park. This approach should be understood and endorsed by all Highway Authorities and the Department for Transport. The same applies at the local level where there is a need for a greater recognition by local highway authorities of the significance and special qualities of National Parks and the design of schemes, road improvements, footways, signage and lighting should reflect this.

Transport Services: A steady decline in commercial bus services over recent years has made access even harder for people without their own transport. This needs to be addressed in innovative ways, working with existing providers and looking at ways of combining users and services (for example, visitor-focused services and local community transport or transport to hospitals and doctors). The Authority does not seek to be a transport provider, but it will work closely with providers and communities to seek and deliver innovative solutions. These can include off-road solutions, with a greater focus on sustainable means of transport, including cycling and walking, with improved networks and facilities for this. The Authority has already achieved much through the use of former

railway lines as multi-user recreational routes, which are popular with local communities and visitors alike (such as the Monsal Trail, Tissington Trail, High Peak Trail, Longdendale Trail and the Manifold Trail).

We are developing the concept of a joined-up visitor and community bus service around the Edale valley, to see how we might develop a new service. We have also examined the successful 'Devon Total Transport' scheme and would like to explore if we can pilot a 'Devon plus' scheme here in the Peak District National Park, with the initial concept considering how we might work with Clinical Commissioning Groups (CCG) to better support provision of non-emergency patient transport services and increase local transport community services, with the Authority acting as a convenor of key stakeholders to pilot this.

Future opportunities are:

1. The Authority is willing to work with Highway Authorities at both a strategic and local level to achieve schemes and designs that are worthy of and appropriate for National Parks, but there is a **need for a clearer statement of responsibility for Highway Authorities**
2. The Authority is willing to **explore the concept of a 'total transport' pilot in the Peak District National Park, which takes the successful Devon model a step further** by helping CCGs deliver more efficient non-emergency patient transport services and increase local community transport provision. We would welcome Department for Transport and Department for Health support for such a pilot.

Part 3 - Current ways of working

We'd like to ask some specific questions about the way National Parks and AONBs work at the moment.

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?

The Peak District National Park Authority works within a complex administrative structure covering three county councils, eight district, borough, city and metropolitan borough councils and 125 parishes. Our role as a convenor for the place that is the Peak District National Park enables us to have conversations, and take action forward, that works with and transcends geo-political boundaries and enables us to act in a way that is best for the place and the people who are connected with the place. We have decades of experience in testing answers to national and global questions at a local level. We aspire to be thought leaders, exemplars and inspirers.

The representation on the Authority reflects the reality of the geo-political nature of the local authorities and parish councils and of the national interest being a nationally-designated protected landscape. Our 30 members (16 council members, 6 parish members and 8 national members) allows us to represent this blend of local and national representation and allows different expertise to be available to the Authority. These 30 members provide an overview and governance oversight to 226 FTE officers of the Authority. This gives an

oversight equivalent to one member per 7.5 officers. Our members offer us a connection to people who live in the National Park and act as ambassadors for National Park purposes,

On governance processes and systems, we are undertaking our own internal governance review, with the aim of improving our engagement, effectiveness and efficiency.

We ask the review to consider what is the right size and make up of membership to be the most representative, effective and efficient:

1. The review is an opportunity to consider how our **governance can best reflect the size of the organisation and those we represent**. 75% of our members are nominated by local authorities and parish councils which have constituencies in the National Park boundary. 25% of members are appointed by the Secretary of State as national members. It is important to consider how our members can harness both the national sentiment and local representation and the precise role of each category of members.
2. We seek a **better approach to appointment of Secretary of State (SoS) members to avoid carrying vacancies for years**. Defra have indicated they will not fill our current national SoS member vacancies until July 2019. By this time the Peak District National Park Authority would have carried two vacancies for members appointed through the Secretary of State appointment process for almost 2 ½ years. Appointment of parish and local authority members is more straightforward with no gap in representation.
3. This review is an opportunity to effect a real change in **membership of National Park Authorities so they are more diverse and representative of those we serve**. Younger people, women, people from BME communities, disabled people and those living in urban areas are poorly represented across the Authority membership. This Authority has successfully engaged with a diverse range of people to access the National Park and would welcome the Review's exploring how we can reflect this success by the way that members are appointed, to ensure barriers and unnecessary restrictions are removed. To achieve real change in representation we need to avoid tokenism and look at making significant changes to remove barriers and create opportunities.

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?

As a collective network of National Parks we work together at the English level, through National Parks England, and at the UK level across the 15 UK National Parks. We collaborate on informing public policy, public communications and promotion of National Parks, joint member training as well as opportunities to join up working together on support functions and develop income generating opportunities, through National Parks Partnerships.

We have ambitions to improve how we work together, acknowledging this will bring significant benefit in:

- economies of scale on delivery
- scaling up delivery across 10% of the most deeply rural areas of the country
- the opportunity to better tell the story of National Parks

There is an opportunity to work better together in the following areas:

- **Input into national policy making**– so government departments proactively seek National Park expertise in the development of English rural policy
- **Audience research and insight** – the audience data available to National Parks is limited due to significant costs, but there is greater scope for efforts to be combined across Government departments and agencies. There is an opportunity to create a centre of excellence nationally for audience insight in protected landscapes using the combined resources of National Park Authorities, Forestry Commission, Natural England and VisitEngland. For example, the programme supported by VisitEngland’s Discover England Fund could be extended to commission and distribute new data sets and insights, and support Protected Landscapes in audience led decision making in their day-to-day activity.
- **Development of the UK National Parks brand** – there is scope to further support and add value to national and international communications and brand development of National Parks throughout the UK, to raise awareness of their presence and the benefits they deliver.

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?

Promoting opportunities for understanding and enjoying the Peak District is already at the heart of what we do. In response to Government directives (the 8 Point Plan for National Parks and the 25 Year Environment Plan) we are increasing our engagement efforts to ensure our National Park is loved and supported by diverse audiences. Through our current Corporate Strategy (2016-2019) we have shifted our direction to focus on connecting under-represented groups to the Park, particularly people under 25 and those living with a health inequality. We are on course to exceed our targets in those areas but we are anticipating a big gap between our audience diversity and the regional demographic.

We continue to work with the MOSAIC champions. This started as an HLF funded project to increase access to and understanding of the National Park by BAME communities. We have supported the Champions to set up as their own charity in order for their work to be sustainable. We have restructured to create Outreach hubs that are close to urban fringes so that we can connect more easily with a wider audience.

Our new 5 year Corporate Strategy (2019-2024) sets out our ambition for a National Park loved and supported by diverse audiences, and in doing so to generate active support in the form of volunteering, donations and commercial income; to increase our reach amongst under-represented groups so that it better represents regional demographics with regard to age, race and disability; to build a stronger identity and reputation so that people understand and feel connected to the Park

To achieve these outcomes we need to know who we are talking to and understand what people feel about the National Park now. Our brand must be developed with a clear story so that audiences can understand and believe in what we stand for. We have carried out

some audience insight work to help us understand current levels of engagement with the Peak District National Park brand and how that engagement could be converted into support. We found that people already have a strong connection to the place and we are in the process of setting up a charity to allow us to actively raise funds to support our work. It is the relationship that we can develop and the benefits we can demonstrate that will inspire audiences to support us. Greater insight would enable us to tackle the barriers that currently limit diversity but in order to be relevant our Membership, staff and volunteers also need to represent regional demographics more closely.

The development of our brand is a long term, slow-burn piece of work. The benefits of brand development efforts, local and national, are not immediate and we need to recognise that long term investment of resources is required to make a real difference. It can be difficult to make that commitment to something that is less tangible than some other elements of our work and budget uncertainty makes that decision even more challenging.

We believe that National Park Authorities should have an increasing role in helping to deliver health and well-being benefits to our communities, both within and around the National Park. In the Peak District context there are many communities close by with relatively high levels of health inequality and poor quality of life. Improved access to and awareness of the National Park, together with schemes to allow and encourage people to experience the National Park could bring wider public health and well-being benefits. Through initiatives such as health walks and green prescriptions, the National Park Authority should work with public health authorities to deliver greater benefit to the nation, with particular emphasis on these benefits being accessible to communities within the National Park.

To open greater access to National Parks to enhance health and well-being we suggest:

1. A facility for a **National Park resource (either physical or digital) to be embedded in urban communities beyond our boundaries** to support our ambitions to be more accessible and representative of the communities we serve.
2. Better links with relevant Government Bodies such as the Department for Education and the National Citizen Service Trust to **increase the impact of the scope of our work with young people**. We would like to see a **Government commitment that every child has the opportunity to visit a National Park to enjoy outstanding learning experiences during their time at school**. The National Curriculum should reflect the importance of Outdoor Learning more strongly. Knowledge of National Parks/AONBs should also form a part of the curriculum so that young people are inspired to understand and care for those protected landscapes.
3. The accord with Public Health England helped us to develop our offer around health and wellbeing but this work will have greater impact if we can **strengthen links with the wider NHS, facilitating social prescribing**.

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

The National Park Grant (NPG) is an essential element of our core funding as National Park Authorities. It supports delivery of our core functions and enables us to lever in further funding from grant bodies, trading income and donations to achieve even more. As a consequence we are able to deliver a lot with a limited core national park grant, for example our core NPG has ranged between 45%-55% of our total spending power over the past few years.

A significant proportion of this additional income comes in through securing major grants. Over the past 15 years, we have secured c. £30m from EU LIFE funding to restore the heavily degraded peat of the Dark Peak and South Pennines SACs, secured significant Heritage Lottery funding to support our work in the South West Peak, and over £1m of funding to support businesses to enhance their offer to international visitors across nine of the English National Parks. The ability to continue to secure such levels of external funding is crucial if we are to achieve future ambitions. When we leave the EU we need access to similar funding to support continuing the important restoration works in the landscape and its natural heritage and cultural heritage.

A further sizeable source of income lies in what we secure through trading, for example in visitor services, and we welcomed the functional power of competence given to National Park Authorities.

Securing income through donations and sponsorship has been a very small proportion of income to support National Park purposes to date. We are seeking to enhance this funding source. Our new corporate strategy seeks to grow this through moving people from awareness, to understanding and support – either through volunteering or financially. We have recently submitted an application to set up a Peak District National Park Foundation.

The Chancellor's Autumn Statement published on 25th November 2015 contained the welcome headline announcement that there would be "protection" for National Parks and AONBs over the Spending Review period. As a consequence of this announcement Defra issued a settlement letter on 21st January 2016 giving a four year settlement figure for our National Park Grant showing that the Grant would be protected in real terms over the Spending Review period. This protection in the current Spending Review settlement was welcomed. It followed a period of year-on-year reductions in the NPG from 2010-11 up to 2015/16, leaving our National Park Grant at approximately 65% of its previous spending power in 2010/11.

The current Defra grant is insufficient to achieve the National Park Authority's ambitious targets for the protection and restoration of landscapes, to increase engagement from diverse audiences and support local communities. The Authority needs to be able to plan for the long-term, which in turn requires certainty of future funding levels.

In light of the above, we seek:

1. A continuation on the long-term grant settlement agreement from government.
2. A restoration of the 2010/11 spending powers to National Park Authorities.
3. Any possible new functions or powers provided to National Park Authorities to come with appropriate resources to enable effective delivery.
4. All public spending within protected landscapes to further National Park purposes (and the duty) of inspiring care in everyone so our protected landscapes are a working model for a sustainable future.
5. National Park Authorities to remain within the financial framework for local authority's in order to maintain end of year flexibilities, reserves policies, VAT exemptions, a funded pension scheme and most importantly our borrowing powers

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

We operate within our boundary, and with the many communities and partners outside our boundary. For example, we are the lead partner supporting the Moors for the Future Partnership (which embraces both the Peak District National Park and wider South Pennines Special Area of Conservation); our outreach and engagement works with the many communities in the urban areas surrounding the National Park; we work with whole communities where villages might be part in and part outside the National Park; and, we work across the National Park network, currently leading the Discover England's National Parks programme for nine National Parks. Our steer and influence operates beyond our landscape, our time and our perspectives and catalyses work and benefits for the nation.

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

Nothing specific to add, other than to ensure any potential new designated landscapes do not diminish the ability of the current designated landscapes to deliver effectively in terms of powers, resources and ways of working.

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

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?

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

These areas make up around a third of the Peak District National Park and are our most protected areas of natural beauty and wildlife and form the backbone of our nature networks. They complement the National Park designation by preventing inappropriate activity and development of our most special landscapes and sites.

The National Park Authority works closely with Natural England to deliver positive land management in these designated areas, but relies on Defra bodies to administer the schemes. This co-operative working is key to ensuring these special sites reach favourable

status. This is becoming increasingly difficult due to lack of resources available within DEFRA, Natural England and the National Park Authority.

Buffering and connecting these designated habitats provides a focus for providing advice and allocating resource, but aside from the limited number of laws and duties indicated in our response to question 9, there is no extra protection for wildlife outside these sites.

The National Park also works closely with designations linked with the built heritage and cultural heritage, with nearly 3,000 listed buildings, 450 scheduled ancient monuments and over 100 Conservation Areas. We work with Historic England, owners and other partners to deliver positive management of these designated sites/buildings

The approach outlined in the 25 Year Environment Plan for the enhancement of nature designations and the development of nature recovery networks is welcomed.

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

a) National Park Management Plan

Section 66 of the Environment Act 1995 requires National Park Authorities to produce a National Park Management Plan which '*formulates policy for the management of the relevant Park and for the carrying out of its functions in relation to that Park*' and should reflect National Park purposes. Each National Park Management Plan should be updated at least every 5 years.

The UK Government vision and circular 2010 for the English National Parks and the Broads states that '*Park Management Plans are the over-arching strategic document for the Parks and set the vision and objectives which will guide the future of the Park over the next 10 to 20 years. The Park Management Plans are for the Parks and not the Authorities. They should be supported by clear strategies with evidence of significant 'buy-in' from key partners and stakeholders, including communities, land owners and land managers. The Government expects public agencies and authorities' active within or bordering a Park to cooperate in the development of the Park Management Plan and the achievement of the Management Plan objectives.*'

This means the National Park Management Plan is not a plan for the work of the National Park Authority alone, it is about what can be achieved by everyone with an interest in the National Park and its future. We involve all the relevant local authorities, partners and other stakeholders in its development and update. It is the largest partnership plan in the Peak District in terms of the range of partners involved. It is the key delivery mechanism for delivering national park purposes. We rely on the goodwill of partners to cooperate in developing the Plan, to provide data, information and insights cut by National Park boundaries and in then delivering the actions. Much has been and continues to be delivered in partnership through our National Park Management Plan, but we could do better with greater buy-in and active participation in delivery by all partners.

To achieve combined commitment to National Park purposes:

1. The duty on relevant authorities to “have regard” to National Parks and AONBs should be strengthened to better align with the 25 Year Environment Plan. We would like to see this duty amended so all public bodies are required to “further” National Park purposes.
2. Relevant Authorities should also be required to co-operate in the development and implementation of National Park Management Plans as the primary place shaping document for their area.
3. Relevant authorities should be required to provide their data and insight information at a National Park level, for example information on ‘not spots’ for digital connectivity to communities in the national park, something which has not been forthcoming.

b) The visitor economy

A more joined-up approach between Government departments and National Parks, locally and nationally, is the key to maximising the benefits of the National Parks to a wider audience. We know through a collective review of our respective visitor and non-visitor surveys that the 15 UK National Parks add value to the UK’s wealth and well-being. This data tells us that:

- The 15 UK National Parks have 104m visits/per year bringing a £6.9 billion value.
- Half of the population has visited a National Park within the past 12 months and four fifths of visitors have been to a National Park before.
- Each year we attract 33m visits by families and 20m new visitors and 9m visitors from overseas
- People visit National Parks because of the scenery, to be outdoors and for peace and quiet.
- Satisfaction with a visit to a National Park was universally high.

The data also shows us how we might learn from each other, for example in general terms, England’s National Parks have the highest number of visitors, Scottish National Parks obtain the highest value from their visitors and the Welsh National Parks attract a younger audience. The data also highlights those groups that are less well represented, younger people, those with a disability and from BME background and in a lower socio-economic class, as well as identifying that the main barriers to access are indifference, awareness and transport.

Enjoyment of protected landscapes brings its own pressures in caring and enhancing what makes them special. Promoting opportunities to enable the enjoyment and understanding of the special qualities of the Peak District National Park is fundamental to the future of National Parks. Understanding that its special qualities are at risk from a range of pressures can help reduce those pressures and increase people’s enjoyment, duty for its care is a shared one. The Peak District National Park currently welcomes over 12 million visits every year, a lot of these are day visits with bring high volume, and at times high impact, but low value to the place. We particularly welcome opportunities to generate a high value, low impact visitor economy.

The 15 National Park Authorities have instigated a programme of work to create key messages for the public in order to raise their awareness of these most special landscapes

and encourage more diverse communities to get out into them, communities who may not be aware of the existence of National Parks and what they have to offer.

The Peak District National Park Authority is acting as the accountable body for the new English National Park Experience Collection, as part of VisitEngland's Discover England Fund and on behalf of nine of the ten English National Parks. This programme is delivering the ambition set out in the Government's 8-Point Plan for National Parks to "promote National Parks as world-class destinations to visitors from overseas and the UK" by providing business support activities to private sector businesses to develop new experiential tourism products, develop skills in working with the travel trade and in welcoming international visitors. Each of the 65 new experiences within the Collection tells the stories of our protected landscapes and their people, to new audiences overseas. It is the first time National Park Authorities have delivered a national programme of work around tourism collectively, and it is developing an audience-led approach to our work.

This will help a key challenges we, and the other National Parks, face in dealing with high volume, low value patterns of visitation. We are, of course, an asset for all to enjoy but that very precious asset is at risk of being over-run by millions of visitors spending little in the local economy and support for the National Park. The National Parks must have more authority/influence in helping to both to manage the pressure of visitors and in promoting enjoyment and understanding. We also have to be allowed to lead the challenge of securing revenue from visitors to support the local economy and our own activities. A tourism tax is frowned on by the hospitality industry, but a more concerted and defined approach to visitor giving, supported by government, is needed.

This can be summed up as, the need to 'make the most of our visitors in order to make the most for our visitors'. If we succeed in this, then the National Parks are better supported in the delivery of their statutory purposes and the economic wellbeing of local communities would be greatly enhanced.

To help improve the visitor economy and reach of our opportunity for life changes experiences:

1. We seek a more **concerted and defined approach to visitor giving**, supported by government.
2. We seek continued recognition of the role National Parks can play in international and domestic tourism, recognising that as well as delivering significant economic benefits to rural communities, visits to our National Parks provide life changing and formative moments in people's lives through engagement with natural and cultural heritage. In practical terms we need **longer term support for the Discover England's National Parks Experience Collection**. The current Discover England Fund programme is expected to end in September 2019 after 18 months of initial investment. To date it has been very well received by tourism businesses and the international travel trade. Experience of successful tourism product development programmes in other countries (for example, the Wild Atlantic Way in the Republic of Ireland) shows it can take around 9 years of sustained public investment to fully realise the benefits of new product development work.

c) Publishing statutory public notices

National Park Authorities are required to publish statutory public notices in the press covering the whole area to which they apply. In the Peak District this means placing advertisements in at least five local papers. The cost of such advertisements, given their relatively small size, is significant and we have no choice but to accept this cost quoted to us by the local press, because they are aware we have no alternative option. For example, the Authority recently partnered with the Highway Authority to allow it to manage public car parks more efficiently. This necessitated the making of an Order under sections 32, 35 and Part IV of Schedule 9 of the Road Traffic Regulation Act 1984. The advertising of that Order and its subsequent sealing in the local press will cost a total of around £27,000.

Given the dramatic technological advances in use of social media and digital connectivity this method of advertising public notices via local newspapers is not cost efficient. It is also not effective in reaching the intended audience, given the decline in the relevance of local newspapers. We consider there are more efficient means of achieving the same, or greater, public reach of our statutory public notices via other routes. This would enable us to spend more of our funding directly towards our aspirations and National Park purposes.

Andrew McCloy

Chair, Peak District National Park Authority

17 December 2018

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