



To Landscapesconsultation@defra.gov.uk  
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**Dedham Vale AONB and Stour Valley Partnership and Suffolk Coast & Heaths AONB Partnership response to DEFRA consultation on Government Response to Designated Landscapes Review.**

The Dedham Vale AONB (DV) and Suffolk Coast & Heaths (C&Hs) AONB Partnerships are supported by one staff team working across the two AONBs. Each Partnership is a stand-alone non-constituted body made up of the AONB team's funding partners (excluding DEFRA) and representatives from the farming, environmental, business interests.

These representations are made on behalf of the two AONB Partnerships who are committed to the (current) purpose of the AONB designation, to conserve and enhance natural beauty. For the avoidance of any doubt, some individual members of the Partnership are public bodies or statutory undertakers who have duties to conserve and enhance natural beauty and it is anticipated these members will provide separate representations reflecting their complete interests and responsibilities. Other Partnership members are likely to make their own representations reflecting their purposes.

Any questions relating to this response, which is in the public domain, should be made in the first instance to Simon Amstutz, the lead officer for the two AONBs in the east of England, the Dedham Vale AONB and Suffolk Coast & Heaths AONB.

## Summary of response:

The Dedham Vale and Coast & Heaths AONB Partnerships welcomed many of the findings in the final report of the Designated Landscapes Review published in 2019. However, it considers that the ambitious paradigm change proposed in the report is at risk of being lost if the some of the proposals are not fully implemented. This could be a missed opportunity for AONBs to support the Government's ambition for people, nature and climate.

AONBs currently deliver on Government objectives relating to nature recovery, net zero and engaging people. The review report clearly signposted a model for designated landscapes to deliver more and better, with many overlaps with current Government priorities relating to nature, climate change and people, designated landscapes fit for the 21st century.

In particular the Dedham Vale and Coast & Heaths AONB Partnerships consider that if Proposal 24 ....*be strengthened with new purposes, powers and resources, renamed as National Landscapes* were to be delivered AONBs could deliver on a wide range of Government ambition:

- A strengthening of the first purpose, *to conserve and enhance natural beauty*, to include a specific reference to restoring nature that currently is encompassed in natural beauty.
- A new second purpose, aligned to National Parks, to promote understanding and enjoyment where it does not impact the first purpose.
- New powers to ensure public bodies pay due regard to the purpose(s) of AONBs, give appropriate weight to AONB Management Plans and consider mechanisms for giving AONBs greater status in planning processes.
- New resources to reflect delivery of new powers and purpose(s).

The current two tier system of protected (designated) landscapes, National Parks and AONBs, has led to inequality in the delivery of purpose(s) and disparity in the delivery of statutory purpose(s) from public and private organisations.

Aspirations for levelling up, addressing the concerns of climate change, loss of nature and engaging a wider audience would be better delivered by a more ambitious implementation of the review report.

## Response by chapters:

### Chapter 1: A more coherent national network

#### Strengthening AONBs:

The Dedham Vale and Coast & Heaths AONB Partnerships welcome the Government recognition that priority action is required for AONBs and that the current two tier system does not allow AONBs to fulfil their potential.

As such the Dedham Vale and Coast & Heaths AONB Partnerships call for the full implementation of proposal 24, relating to purpose, powers and resources. They consider that a name change alone cannot deliver the required change to support Government aspirations expressed in the 25 Year Environment Plan, 30 by 30 and Climate Change aspirations and that purpose, powers and resources should be reformed in the ways outlined below:

#### **Purpose**

**Create a single first purpose for AONBs and National Parks.** Change the current statutory purpose of ‘conserve and enhance’ to reflect the need to actively recover nature in these areas. The term natural beauty already reflects flora and fauna, but consideration should be given to further promoting the natural beauty definition or explicitly reflecting a purpose to restore nature in this first purpose.

**A new second statutory purpose**, for AONBs and similar to National Park second purpose, to deliver enjoyment and understanding of AONBs to reinvigorate ambition to connect all parts of society with the countryside.

A third statutory purpose to support vibrant local communities is not considered necessary, given obligations placed on local authorities.

#### **Powers:**

Strengthening the wording of the existing duties for public bodies to ‘have regard’ to the statutory purposes of AONBs to ‘**pay due regard**’. This would enable the better delivery of current or proposed purpose(s) as set out in national policy, AONB management plans and meet current Government aspirations.

Greater weight should be given to AONB Management Plans with **responsibility on AONB authorities to implement Management Plans** rather than the current requirement to develop and review Management Plans.

Further consideration of granting AONB Conservation Boards, Staff teams or Partnerships statutory consultee status or **a mechanism to give greater weight to the AONB view**. This could be delivered by setting thresholds on when the AONB became a statutory consultee to avoid unnecessary administrative burden and potential duplication with local planning authorities.

Alternatively to provide a statutory instrument **to give the AONB position greater and significant weight** when determining development applications.

**Resources:**

Appropriate resources **will need to be made available to AONBs as proposed in the review report to enable the step change in delivery** expressed in any changes to powers and purpose(s). Such additional resources would be an efficient way of delivering ambition on nature, engaging people in the countryside and adapting to impacts of climate change. AONBs already deliver huge amounts within the current restricted funding environment, meaning each pound invested in AONBs leads to multiple pound delivery of public good.

It is worth noting that doubling the current national AONB budget (ie that shared between the 34 English AONBs) would be the equivalent of the funding provided to one National Park.

While recognising the role of a blended financial system, including new opportunities that should be developed at a national level for local benefits, AONBs have long demonstrated their considerable skill in securing external finance for project activity. The principle of public funding for public goods delivered through AONB core funding should continue and be enhanced as outlined in the review report.

The resources made available through the Farming in Protected Landscapes programme is welcomed and should be continued through emerging Environmental Land Management Scheme. Further consideration should be made to supporting AONBs to deliver other public goods or a range of ecosystem services, in particular those related to nature recovery, appropriate access and safeguarding natural resources.

The Dedham Vale and Coast & Heaths AONB Partnerships consider that powers, purpose and resource should be brought to relevant AONBs for them to deliver the Heritage Coast purpose, much of which overlaps with current AONB purpose. This would be a cost effective way to deliver gains that form part of the Government's aspiration for nature recovery, addressing the impacts of climate change and public health and wellbeing. This aspiration is contained within the 25 Year Environment Plan and the National Planning Policy Framework and supporting AONBs in this way would be an efficient way of supporting action to deliver this ambition.

The Dedham Vale and Coast & Heaths AONB Partnerships consider that there is also an opportunity to review Heritage Coast boundaries to ensure they make sense. No legislation would be required for boundaries to be reviewed and in cases such as the Suffolk Heritage Coast there may be a case for extending the area into the estuaries. To do more protected landscapes need to do more outside their designated boundary and this would be an efficient way to add to that process.

Strategic Direction:

The Dedham Vale and Coast & Heaths AONB Partnerships welcome the Government suggestion for greater collaboration between National Parks and

AONBs and give a cautious welcome to the mechanism suggested for a 'national landscapes partnership'. However, this would be dependent on the details contained in any proposals, including the need to:

- Build on existing collaboration both between National Parks and AONBs and within each grouping of protected landscapes, eg National Parks England and the National Association for AONBs.
- The direction set out in the proposed National Landscapes Strategy from Government.
- The direction of Natural England guidance on managing AONBs, including emerging management planning guidance, and governance principles and structures.

The defined aspirations for the national landscapes' partnership are to:

- *generate additional private income through green finance initiatives and joint funding bids.*
- *champion protected landscapes and run national campaigns, such as promoting tourism.*
- *develop strategic partnerships and programmes with a particular focus on commercial partners.*
- *create opportunities to provide training and development, and*
- *share knowledge and expertise to build capacity across the protected landscapes family.*

These are broadly welcomed but the Dedham Vale and Coast & Heaths AONB Partnerships consider:

- New finance initiatives have a role to play in funding project activity. A transparent review of AONB funding on the scale suggested in the review and longer term settlements would be welcomed.
- Welcome national campaigns to promote purpose. The Dedham Vale and Coast & Heaths AONB Partnerships recognise the importance of the tourism industry (worth over £300M per year and supporting over 5,000 jobs across the Dedham Vale and Coast & Heaths AONBs in 2019) dependant on AONBs having a second statutory purpose relating to enjoyment and understanding.
- Building new partnerships and programmes is important where they deliver AONB purpose(s).
- Recognise the important role a coordinated training programme can deliver and the opportunity to build on initiatives from the NAAONB.
- Recognise the opportunities to build expertise across 'national landscapes' but note capacity for many AONB teams to engage is limited.

### A Unified Mission

The Dedham Vale and Coast & Heaths AONB Partnerships recognise that a unified mission for National Parks and AONBs is a desirable outcome of the review. This would require more than a simple change in names. Any unified mission would

require a step change for AONBs relating to purpose, funding and powers as outlined above.

## **Chapter 2: Nature & climate**

The Dedham Vale and Coast & Heaths AONB Partnerships welcome the Government's commitments to nature recovery and addressing climate change. These Partnerships welcome opportunities beyond the current purpose to conserve and enhance natural beauty to support meeting targets in Government's commitments. The Dedham Vale and Coast & Heaths AONB Partnerships consider the purpose of conserving and enhancing natural beauty is compliant with much of the work required to address climate change and nature decline.

The Dedham Vale and Coast & Heaths AONB Partnerships consider that the Sandford Principle be applied to all Protected Landscapes and not just National Parks. This would address the issue of potential conflict between a revised first purpose and a proposed second purpose, i.e. where public enjoyment cannot be reconciled with the conservation and enhancement of natural beauty (and the restoration of nature?) priority must be given to the conservation of natural beauty.

### The Nature Recovery Network and 30 by 30

The Dedham Vale and Coast & Heaths AONB Partnerships consider that they have the potential to build significantly on current excellent activity on nature recovery and addressing climate change given appropriate powers, purpose and resources. Many partners consider there is a great deal of urgency around the need to deliver on 30 by 30 and that new powers, purpose and resources should be given to AONBs to affect immediate action. The statutory AONB Management Plan and emerging AONB Nature Recovery Plans have the potential to play a key role, (in addition to direct delivery), in Local Nature Recovery Strategies if Government supported this through encouragement of responsible authorities.

AONBs are, if properly empowered and resourced, well placed to support aspirations around 30 by 30 and addressing climate change given their ability to convene partners, expertise and potential.

### A stronger mission for nature recovery

The Dedham Vale and Coast & Heaths AONB Partnerships would welcome a stronger mission for nature recovery. The Government Response notes that the aim to make amendments to the current statutory purpose are:

- *A core function of protected landscapes should be to drive nature recovery*
- *A revised purpose should be more specific with regards to nature outcomes and explicitly mention biodiversity*
- *The principle of natural capital should also be included to capture the societal value of nature in our protected landscapes and encompass a broader range of ecosystem services.*

The Dedham Vale and Coast & Heaths AONB Partnerships welcome the first two bullets but are concerned that resource, energy and time devoted to the third bullet could detract from delivery of previously established AONB purpose. Conserving and enhancing Natural Beauty is an established principle and statutory purpose and while it is important to understand AONB's natural capital this should not temper the activity of first two bullets.

#### Setting ambition and monitoring progress

The Dedham Vale and Coast & Heaths AONB Partnerships welcome the proposals to enhance monitoring and reporting but consider that such requirements are proportionate to the funded delivery and should be consummate with any additional powers, purpose and resource arising from Government's response to the review.

#### Agricultural transition

The Dedham Vale and Coast & Heaths AONB Partnerships consider that the early indications of the Farming in Protected Landscapes programme are a step change for meeting the current AONB purpose and contributing to Government aspirations around people, place, nature and climate.

Lessons learnt from the Farming in Protected Landscapes programme should drive the inclusion of a similar programme of the emerging Environmental Land Management Schemes.

The Farming in Protected Landscapes programme has enabled a reinvigorated relationship between AONBs and their farming and landowning communities. The gains achieved through public investment should be the foundation of further delivery on Government priorities for people, place, nature and climate through drawing on AONB Management Plans, farming and landowner knowledge and emerging Local Nature Recovery Strategies.

### **Chapter 3: People & place**

The Dedham Vale and Coast & Heaths AONB Partnerships recognise the aspiration for protected landscapes to offer everyone in society a share of the benefits that they can provide. It further recognises the setting or hinterlands of AONBs have much to contribute to the Protected Landscape and AONB purpose can be served by action within these areas.

#### Landscapes for everyone

The Dedham Vale and Coast & Heaths AONB Partnerships welcome the Government's view that increased engagement can be achieved via the provision of additional resource such as rangers. In addition, all staff in protected landscapes should seek to widen engagement, as all staff have an important role to play in delivering on inclusivity, such as community development officers; landscapes for all officers and countryside officers to name but a few.

#### A stronger mission for connecting people and places

The Dedham Vale and Coast & Heaths AONB Partnerships concur that a second statutory purpose to clarify and reinvigorate ambition to connect all parts of society with protected landscapes would support the delivery of the review report. The Dedham Vale and Suffolk Coast & Heaths AONBs currently facilitate may hundreds of volunteer workdays which contribute to the delivery of the current AONB statutory purpose. This in itself delivers for nature recovery, a sense of place, public health benefits (physical and mental) and is considered to be a significant contribution to society.

### Supporting local communities

The Dedham Vale and Coast & Heaths AONB Partnerships consider a new statutory purpose to support vibrant local communities is not considered necessary to achieve the objective of vibrant local communities due to the existing statutory responsibilities placed on local authorities that currently host AONB teams. Should hosting arrangements change this should be a consideration in setting up new arrangements.

### Sustainable transport

Our proposals to strengthen the statutory purposes of protected landscapes and strengthen the duty of regard (Chapter 4) should increase the weight local authorities give to supporting local rural communities and the public's enjoyment of protected landscapes through their transport plans.

### Open access land

No comments

### National Trails

The Dedham Vale and Coast & Heaths AONB Partnerships consider that protected landscapes and National Trails have different purpose. It recognised that where National Trails pass through or are within protected landscapes they present an opportunity to support responsible access and a means to engage people. The need to follow the mitigation hierarchy relating to impacts from the development of National Trails should be embedded in policy.

### Sustainable tourism

The Dedham Vale and Coast & Heaths AONB Partnerships consider that protected landscapes can be the canvas for more sustainable tourism and if appropriate powers, purpose and resources were afforded to AONBs they could contribute to existing tourism activity, which was worth over £300M in 2019 across the Dedham Vale and Suffolk Coast & Heaths AONBs.



## Managing visitor pressures

The Dedham Vale and Coast & Heaths AONB Partnerships recognise the increasing tourism pressures and associated inappropriate behaviours arising within protected landscapes and consider these were on the rise even before the current pandemic. Community expectations of managing inappropriate behaviours by visitors to AONBs are not matched by any powers AONB staff teams or Partnerships have. It considers that any enforcement powers made available to National Park Authorities should be made available, with appropriate resource, to local authorities with AONB within their jurisdiction. A system similar to that relating to the Recreational Disturbance Avoidance and Mitigation Strategy should be considered.

## Planning reform and the role of AONB teams in planning

The Dedham Vale and Coast & Heaths AONB Partnerships welcome the Government's response to the review that recognises the need to give greater weight to AONB statutory purpose. It considers that this could be achieved by a strengthening of the 'duty of regard' with this linked to strengthening the status of AONB Management Plans, and for AONB Partnerships to have a formal role in planning and development management with associated additional resources.

The Dedham Vale and Coast & Heaths AONB Partnerships welcome the Government's response to the review that recognises the need to give greater weight to AONB statutory purpose(s). It considers that this could be achieved by a strengthening of the 'duty of regard' with this linked to strengthening the status of AONB Management Plans, and for AONB Partnerships to have a formal role in planning and development management with associated additional resources.

AONB bodies need to be engaged as early as possible at the plan making stage. Early engagement provides AONB bodies a vital opportunity to help shape and improve policies that have the potential to impact on the AONB. This covers a wide range of policy areas including that relating to the built environment, infrastructure, economic development, design and landscape management.

Despite the existence of national guidance and policy expressed through the the National Planning Policy Framework, understanding about AONBs and the application of the national policy and guidance can vary greatly across different planning authorities. AONB bodies therefore have a useful role to play working alongside planning authorities to shape and strengthen Local Plan policies for AONBs.

As well as helping to build relationships between AONB bodies and the planning authorities to support better planning, early engagement of the AONB bodies will ensure that emerging policies comply with national policy and in the National Planning Policy Framework and also deliver against the statutory purpose (s) of designation i.e. to conserve and enhance natural beauty.

AONB bodies have a useful role to play when site allocations are being considered. This provides an opportunity for AONB bodies to assess whether allocations (housing or employment) being proposed in emerging Local Plans are appropriate

for AONBs or their setting. It is also a check to ensure they accord with national AONB policy and guidance policy such as the National Planning Policy Framework and Planning Practice Guide as well as fulfilling the statutory purpose(s) of designation. Where allocations are not considered appropriate early engagement provides AONBs bodies the opportunity to secure changes for more appropriate sites.

Paragraph 176 of the National Planning Policy Framework sets out a high-level approach for planning within AONBs and their setting. AONB bodies have a great level of detailed knowledge about the areas they work in. AONB bodies have a key role to play in translating the principles in the national guidance and policy into strong effective criteria-based policy in emerging Local Plans. This early engagement in policy development is essential to aid good decision making at the planning application stage.

The inclusion of a strong AONB policy in the Local Plan provides a useful framework for developers and Parish Councils or Neighbourhood Forums preparing Neighbourhood Plans.

Granting of statutory consultee status to AONB bodies was recommended by the Designated Landscapes Review Report.

The Dedham Vale and Suffolk Coast & Heaths Partnerships support the proposal to make AONB bodies statutory consultees. These Partnerships are aware that this would place specific new burdens and obligations on AONB bodies which are prescribed in [The Town and Country Planning \(Development Management Procedure\) \(England\) Order 2015](#)

Not all AONBs are subject to the same planning pressures, however becoming a statutory consultee will place a new burden on all AONB bodies. Any change in consultee status for AONB bodies will require proper resourcing so that AONB bodies can carry out this new responsibility effectively.

The Dedham Vale and Suffolk Coast & Heaths Partnerships concur with the view in the Designated Landscapes Review Report that says:

*that this does not mean AONBs should become consumed with putting in advice on every single planning application*

and that they should:

*should agree with their local planning authorities what they should be consulted upon and be free to comment if something of significance appears.*

Some AONB bodies (Cotswolds, Isle of Wight, Mendip Hills, South Devon) already have agreed Planning Protocols in place with planning authorities to help manage planning caseloads. The Dedham Vale AONB and Suffolk Coast & Heaths AONB team currently use a Position Statement to set out what we want to be consulted at the plan making and decision-making stages. It works well for plan making but less well in relation planning applications.

The Dedham Vale and Suffolk Coast & Heaths AONB team also use a triage system to decide which applications we respond to help manage caseloads. The team is currently developing a Planning Protocol which will be supplemented with standard advice for minor applications to further streamline the process.

There is likely to be a role for the use of similar measures if AONB bodies become statutory consultees to manage the workload.

Even without statutory consultee status the planning services of many AONB bodies are under significant strain linked to the growth in planning pressures and the significant increase in the number of planning applications. Access to planning expertise within AONB bodies is not equitable which adds to the pressure on some AONB bodies where a decision has to be made locally where to invest limited resources to deliver AONB purpose(s).

Many AONB bodies will only invest in a part-time planning officer while some AONB bodies have no planning resource. This results in a lack of resilience of the service. This is compounded by the fact that the skills needed to provide AONB advice combines knowledge relating to planning and landscape of which there is a current shortage. This is compounded by a lack of resource and expertise within local planning authorities meaning they often rely on AONB bodies for guidance.

AONB planners are increasingly required to engage in public inquiries and Nationally Significant Infrastructure Project processes. If AONB bodies are granted statutory consultee status, participation at inquiries and Nationally Significant Infrastructure Processes will become obligatory requiring appropriate resources.

The Dedham Vale AONB and Suffolk Coast & Heaths AONB Partnerships agree that AONB bodies should agree with local planning authorities which planning applications they should be consulted on. The use of Planning Protocols and standard advice could achieve this.

AONB bodies should be consulted on all planning applications that have the potential to significantly impact on the natural beauty and special qualities of the nationally designated AONBs. This should include applications classed as major, all applications requiring Environmental Impact Assessment and all Nationally Significant Infrastructure Project.

For clarity, the Dedham Vale AONB and Suffolk Coast & Heaths AONB Partnerships are defining major development as it is defined in the Town and Country Planning (Development Management Procedure) (England) Order 2015 (Part 1, Article (2)(1)), including housing development of 10 or more dwellings.

In addition to the applications listed above, the Dedham Vale AONB and Suffolk Coast & Heaths AONB Partnership consider that AONB bodies should be consulted on the following planning applications:

- (i) are of a sufficient scale or set within a sensitive landscape setting with the potential to detract from the protected landscape qualities of the area (due to footprint, scale, mass, height and location) e.g. agricultural buildings,

industrial sites, offices, care homes, non NSIP energy projects, isolated dwellings and housing applications for 10 + dwellings.

- (ii) could significantly reduce the tranquillity of the area through increased levels of light and noise e.g. sports facilities, road proposals and mineral extraction sites
- (iii) could result in a notable increase in disturbance from increased numbers of visitors or recreational pressures e.g. increases associated with nearby housing developments and new visitor attractions.
- (iv) could change the landscape character of the area e.g. poly-tunnels and pony paddocks
- (v) could impact Public Rights of Way, particularly promoted routes in the AONBs.
- (vi) require a departure from Local Plan policy and/or for exception site
- (vii) fall within a 5km buffer zone around the AONBs. This should not preclude the AONB team being consulted on proposals beyond the 5km from the AONBs where they could significantly impact upon their setting.

### Permitted Development

The Dedham Vale and Coast & Heaths AONB Partnerships welcome the Government's recognition that permitted development rights can have a negative impact on statutory purpose of AONBs. It considers that monitoring of permitted development rights will not deliver the conservation and enhancement of natural beauty and that a review of them is required now. AONBs would be able to provide specific examples of where permitted development has caused harm to statutory purpose.

### Affordable housing

No comments

## **Chapter 4: Supporting local delivery**

### **Local governance**

#### National Park Authorities, the Broads Authority and Conservation Boards

No comments

#### AONB Partnerships

The Dedham Vale and Coast & Heaths AONB Partnerships welcome the Government's view that local governance should facilitate high standards of

collaboration, be flexible to reflect local circumstance and should reflect the necessary skills, all of society and democratic accountability. It considers that current arrangements may not reflect all of these requirements and any future Natural England guidance should include governance principles, processes, and structures that local authorities would be expected to follow.

### Management Plans

The Dedham Vale and Coast & Heaths AONB Partnerships welcome the Government's view that in delivering proposal 3 a new national landscape strategy can deliver strengthened management plans aligned to current policy and the AONB purpose or potentially revised purposes. It will seek to engage in the Natural England review of guidance for protected landscape management plans.

### A Clearer role for public bodies

The Dedham Vale and Coast & Heaths AONB Partnerships concur with the Government view that public bodies and statutory undertakers have a huge influence on meeting current AONB purpose. It also agreed that the current duty of 'have regard' is too weak and section 85 of the Countryside and Rights of Way Act 2000 should be updated to:

*In exercising or performing any functions in relation to, or so as to affect, land in an area of outstanding natural beauty, a relevant authority shall **have pay due** regard to the purpose of conserving and enhancing the natural beauty of the area of outstanding natural beauty.*

[Local emphasis to demonstrate proposed change]

### **Sustainable financing**

The Dedham Vale and Coast & Heaths AONB Partnerships note that any proposed changes to responsibilities for AONBs, eg in revised purpose, will require proportionate resources. It welcomes a national landscapes partnership role to develop opportunities for blended finance (public and private sector). The review recognised AONB teams are currently under funded and noted:

*In the meantime, AONBs need an uplift. We believe their total funding should be doubled from the current £6.7m to £13.4m, with the uplift in funding that would no doubt come from a revised funding formula implemented over a longer period.*

The Dedham Vale and Coast & Heaths AONB Partnerships concur with this view that funding should be doubled over the lifetime of this parliament and that a new formula for AONB funding should be developed recognising any revised purpose and obligations. It is noted that AONB teams have excelled themselves in securing charitable grants to deliver AONB purpose. However, given the legal status of many AONB teams as part of a host local authority, eligibility for some funding

opportunities are limited and current resources to develop new and innovative sources of funding are not currently available.

### **General power of competence**

No comments

For and on behalf of the Dedham Vale AONB and Stour Valley Partnership and Suffolk Coast & Heaths AONB Partnership

Simon Amstutz  
AONB Manager  
[simon.amstutz@suffolk.gov.uk](mailto:simon.amstutz@suffolk.gov.uk)