



Special and Outstanding: The Glover Review and the Nature Conservation Challenge in England's Designated Landscapes

Nicola Bell and Guy Garrod

November 2019

1. Introduction

'Special'...'Outstanding'...'Unique'... 'Iconic'... 'Loved'...'Important'

The forty four English National Parks and Areas of Outstanding Natural Beauty have an associated lexicon. It's a language of enthusiasm where passion to conserve and promote the benefits of these spaces shines through. In fact you will struggle to find, in print at least, any serious detractors from the concept of landscape designation - to write such a thing would be to invite derision. However, closer analysis of the state of our protected areas by campaigners and researchers alike has revealed a series of issues that need to be tackled to secure the future of these landscapes. The National Parks and Access to the Countryside Act (1949), passed seventy years ago this year, has stood the test of time in terms of our national reverence for its ideals and aspirations but there is widespread recognition that more work must be done. This is the context in which Julian Glover has recently published a Review of England's Designated Landscapes which placed the challenge of doing more for nature conservation at its heart.

The Glover Review report was ambitious and far reaching examining every area of work that designated landscape organisations could and should be involved in. Covering both national parks and AONBs it uses the unifying concept of the 'national landscape'. The report had a clear headline set out on the front cover and re-iterated through the twenty seven proposals which the report contained It states:

"We want our national landscapes to work together with big ambitions so they are happier, healthier, greener, more beautiful and open to everyone." (Glover Review, 2019)

In this discussion paper we examine the agenda for change – the arguments that are being made about how designated landscapes could deliver more for nature and connect in deeper and more inclusive ways. In particular it focuses on the challenges for conservation, on securing a better future for nature and sustaining the cultural landscapes which make England's protected areas 'iconic'. It uses the analysis produced by a range of organisations involved in management, policy and campaigning as a response to the Glover Review in 2018 and the report produced by the Review team in September 2019. It concludes by arguing that the current political context means that we need to look to what can be achieved with the post Brexit resource base and without any legislative change in the short to medium term. Hence we argue that the design, delivery and resourcing of the post Brexit Environmental Land Management Scheme (ELMS) is critical to the future of both conservation and sustainable socio-economic development in the protected landscapes. ELMS received relatively little coverage in the Glover Review Report but is vital to achieving more ambitious and long term change for nature and for the people who are fundamental to securing improvements to the natural environment.

The Glover Review report has been unanimously described as 'ambitious' and 'far reaching'. There is no doubt that the vision is clear but the actions required to achieve it are less detailed. The fundamental issue is what is achievable given a political context in which it is best uncertain. Changes that require new legislation, new resources and the creation of new public bodies seem unlikely at least in the short term. In this report we ask what could and should be achieved with the resources and organisations already available? How can we best build on existing achievements based on the analysis of the present system presented by those organisations most involved in managing the protected landscapes?

This discussion paper has three sections. In the first section we examine the responses of a range of organisations made to the call for evidence issued by the Review team in autumn 2018. We have included this to outline which organisations were prioritising which issues before the Review team were discussing their findings and recommendations. We then summarise the Glover Review findings and some of the reactions and responses to the report's publication. In the final section we ask 'what next'? Accepting the case for prioritising nature conservation we consider the practicalities of delivering this ambition as well as asking what more could be done to achieve the other priorities set out in the Review report.

2. Views on Designation - Responses to the Glover Review Consultation Phase

In 2018 Defra published a 25 Year Plan for the Environment setting out plans to help the "natural world regain and retain good health". It aims to "deliver cleaner air and water in our cities and rural landscapes, protect threatened species and provide richer wildlife habitats" (Defra, 2018a). Furthermore, it sets out "an approach to agriculture, forestry, land use and fishing that puts the environment first". The tone and content of the 25 Year Plan for the Environment follows on from the findings of the Lawton Review (Lawton, 2010). Lawton provided a comprehensive analysis of the state of nature and nature conservation policy in England and subsequently been used in the campaigning focus of the major conservation charities.

The 25 Year Plan for the Environment included a pledge to review England's protected landscapes to examine what changes might be made of this system seventy years after the creation of national parks (Defra, 2018a). These designated landscapes cover 24.5% of England and hence are very important to achieving national objectives for the natural environment (Glover, 2019, p.20). Furthermore, with conservation one of the two national park purposes it might be expected that designated landscapes should be at the forefront of 'putting the environment first'. It was in this context of a growing political agenda for action on the natural environment that the Glover Review was conducted.

Julian Glover, a journalist and author, was announced as the chair of the landscapes review with other members of the review panel appointed in June 2018. From the outset it was made clear that the review would not reduce the geographical coverage of protected areas or the protections given to them. Neither would it impose 'new burdens'. Instead the aim was to look for improvements and modifications which would improve the system. As such the Glover Review terms of reference state that they will make recommendations on:

- the existing statutory purposes for National Parks and AONBs and how effectively they are being met
- the alignment of these purposes with the goals set out in the 25-Year Plan for the Environment
- the case for extension or creation of new designated areas
- how to improve individual and collective governance of National Parks and AONBs, and how that governance interacts with other national assets
- the financing of National Parks and AONBs
- how to enhance the environment and biodiversity in existing designations
- how to build on the existing eight-point plan for National Parks and to connect more people with the natural environment from all sections of society and improve health and wellbeing
- how well National Parks and AONBs support communities (Defra, 2018b).

In autumn 2018 a public consultation was launched inviting views on all aspects of the Review's remit. The remainder of this section summarises the messages to emerge from the consultation responses available to the authors by March 2019. The source material used is detailed in appendix one. It is a partial analysis in the sense that the Glover Review report confirmed that around 2,500 responses to the consultation were received. It seems likely that a high proportion of these were from individual members of the public and local conservation/amenity societies. No report summarising these responses has been made public. This discussion paper looks at those made by the key organisations involved in management and the leading campaigning organisations which

were put in the public domain or made available to us through contacts in the sector. We believe these are important to understanding the breadth of opinion on the key issues as well as highlighting some areas that are likely to form the basis of ongoing debate. Furthermore, this kind of analysis helps us to understand the differences in the issues and problems faced in different geographical areas and between different organisation types. Finally it helps to build understanding of the recent history of reform agendas – of who has been arguing for what and why.

Messages to Emerge -The Areas of Outstanding Natural Beauty (AONBs)

The National Association for AONBs provided a very detailed response on behalf of the thirty three AONBs in England. The organisations which run AONBs differ widely in how they are constituted and the size of their staff teams. They also differ in how they are referred to. Hence in this report we use the acronym AONB to refer to the geographical areas and the term AONB organisations to refer to the bodies that lead on their management. The National Association is itself a charity independent of central and local government with a membership that includes AONB boards, partnerships, local authorities, other charities and concerned individuals. The content of the NAAONB response includes:

- The need to align the purposes of AONBs and National Parks so that AONB statutory purposes include wildlife/cultural heritage and understanding/enjoyment in addition to a more explicit function on socio-economic development including a duty to "seek to foster the economic and social wellbeing of local communities" (NAAONB, 2018).
- The imperative to strengthen the duty on other public bodies to have regard to AONB purposes including giving AONB organisations statutory consultee status in planning.
- The benefits of giving AONB organisations an enhanced role in the delivery of land management and rural development schemes including using AONB management plans as a framework for schemes. The possibility of grouping together protected areas in locally tailored programmes is also considered.
- The urgent need to address the under resourcing of AONB organisations including public funding through Defra and further developing fund raising activity.
- The need to give AONB partnerships a legal status.
- The need for training for members of all AONB organisation types.
- The case for creating new AONB Boards and National Park Authorities. The response argues that while changes to governance/designation type should not be necessary for the majority of AONB organisations there is evidence that need organisational change the National Association would support this. Hence there is a case for change to designation status only in "limited cases" (NAAONB, 2018).
- The need for a sustainable development fund for both AONBs and National Parks to support communities and businesses.
- The case for creating new AONBs in particular in the Forest of Dean and the South Pennines.
- The need to 'rebrand' AONBs to enhance public awareness.

The main message to emerge is the need to address the status of AONBs. As the NAAONB response articulates, "It is essential that both forms of designated landscape achieve parity of status, influence, and resourcing before true collaboration can further develop". Key steps to achieving this parity are alignment of purpose and resourcing. Therefore, NAAONB argues that "Government

should issue a single remit letter to AONBs and National Parks, signed by the Prime Minister, linked to their Defra grant" (NAAONB, 2018).

The four partnership responses available to the authors all fully endorse the NAAONB response. It was notable how closely the AONBs worked together through their national association to communicate these key messages. The individual AONB organisation responses which we accessed were additional points to emerge relating to the local circumstances in which the partnerships operate and provide specific examples of good practice as shown in the two examples from Shropshire and Chichester Harbour.

The Shropshire Hills response is written in a context of a growing interest in changing its status or organisational structure. The creation of a conservation board was being considered in 2018. The instigation of the Glover Review meant that this was shelved. The response argues that the AONB organisation needs a stronger and more secure structure with their current positioning within a local authority stretching them to breaking point. The response clearly outlines the argument that AONBs have become highly effective convenors (or 'honest brokers') as a result of the need to work in partnership but that their management plan simply does not have sufficient status especially with regard to the planning system.

The Chichester Harbour response reflects the fact that it is the only joint Statutory Harbour Authority and AONB organisation. It was created through the Chichester Harbour Conservancy Act, 1971, so has recreation and conservation purposes. The response details how access and recreation on both land and water are well managed in the designation as a result of the framework created through the 1971 Act. It also provides an examples of the successful use of volunteer resources/fund raising activity through the creation of The Friends of Chichester Harbour (active since 1987) and the Chichester Harbour Trust in 2002.

While four responses are not the basis of a comprehensive analysis of the agenda for change being pursued with the AONB community they are a useful addition to the NAAONB response in that they add to our understanding of the local experiences which have fed into the NAAONB recommendations. They also demonstrate how the frameworks in which each AONB organisation operates vary considerably not just because of topography but also through the legislative and organisational histories of the bodies that administer the designation. It is interesting that while the AONB responses continually look across to the legislative and funding provisions enjoyed by the National Parks the National Parks England (NPE) and NPA (National Park Authority) responses give very little attention to AONB organisation and show virtually no awareness of how they operate or how this could be reformed for the wider public benefit. The consultation responses from AONB organisations highlight lots of good practice with regard to nature conservation, inclusivity and partnership working but the dominant message is the need to address status, purposes and resourcing.

Message to Emerge – The National Park Authorities

There are clear areas of consensus across the responses from National Parks England, and the individual NPAs. Each NPA is an independent, special purpose local authority created as a result of the 1995 Environment Act. NPE membership consists wholly of the ten English NPAs and it exists to be their collective voice. Analysis of the responses shows there is agreement on the following:

- The need for NPAs to acquire more powers and funding to enhance nature and wildlife in

their areas.

- The NPAs should play a major role in delivering integrated, locally tailored, results based land management and rural development schemes through national Environmental Land Management Schemes (ELMS).
- The requirements on public bodies to further purposes/ the duty and implement management plans should be strengthened including changes to the wording of the relevant legislation and to the planning framework.
- The need for more certainty in what public funding the NPAs are going to receive from the UK Government.
- The need for more diverse NPA board membership in terms of gender, ethnicity, age.
- The need to further engage with the challenges of involving young people and in promoting the health and wellbeing of the population as a whole.

In addition to advocating these specific changes there is also general consensus that:

- The national park system offers the tax payer good value for money. In particular that the NPAs have successfully used partnership working to overcome deficiencies in funding and powers. In summary the NPAs 'punch above their weight'.
- The Rights of Way network is poorly financed and confusingly administered
- That affordable housing and sustainable transport remain a major problems in the majority of the parks.
- That no 'third purpose' on socio-economic development is needed. NPAs current duty to have regard to social and economic development is sufficient.
- That they should remain independent NPAs to reflect the special and unique qualities of the Parks while working together more.
- Any extensions or additions to the National Parks system should not be achieved through 'watering down' funding to the existing Parks.

There are, however, some differences in the NPAs responses which indicate that, although there is consensus on what needs to change, how this should be achieved or the extent of the reform required is debatable. We have identified four areas where differences emergence. These are not necessarily points of disagreement but topics on which there are different ideas about the best way forward.

- 1) Working together - While all agree that the NPAs need to work together more, when it comes to the question of how there is lots of diversity on the detail. Most NPAs also included examples of current joint working but again the areas highlighted differ from Park to Park.
- 2) Governance reform - This is perhaps the area where there is most disagreement. Each NPA, with the exception of the Broads Authority, makes a statement on how they would like to be reformed. Hence while the Yorkshire Dales, Lake District and Peak District advocate a reduction in size of the NPA the remainder either consider that their governance arrangements have broadly worked to date or that there are potential pitfalls in governance reform. The North York Moors pre submission paper argues that a mix of local and national members are needed so that they "see overall merit in the current arrangements" and "the main determinant of how far-reaching the impact of the NPA is, is the overall political and policy context in which it operates" (North York Moors National Park Authority, 2018). At the Northumberland National Park Authority meeting at which the pre-submission paper

was discussed there was lively debate on governance questions with regard to the size of the Authority and the length of time local authority members could serve.

- 3) Finance - While all NPAs want more security and access to a greater diversity of funding sources there was variation in the detail on answers of how finance should be reformed. Several responses provide detail of how the current funding arrangements work and how it could be changed but the detail differs. Likewise, while all agree that a direct grant from Defra is needed there are variations in the degree to which they see fundraising, charitable grants and sponsorship as a viable future source of funding. Some mention future of the Heritage Lottery Fund, the EU Leader Programme and the Single Prosperity Fund as they look ahead to the changing funding landscape. However, not all engaged with the impacts of these shifts beyond funding for ELMS.
- 4) Affordable housing and transport - Each NPA suggest different reforms and measures both locally and nationally to tackle these issues. There are a wide diversity of different ideas on what could be done.

Taken at face value it would seem that the AONB organisations have achieved a higher degree of consensus on the reform agenda with the material that was placed in the public domain revealing fewer points of debate than between the NPAs. It may be that the weaker funding and status position of AONB organisations combined with efficient co-ordination through NAAONB has resulted in consensus on the most important reforms. However, what we have also seen is a reflection of the different organisational status of the bodies managing designated landscapes. AONB organisations do not have to make their minutes public in the same way that NPAs, as special purpose local authorities, are required to do. In this case the existence of legally constituted Authorities rather than loser partnerships helps researchers and interested individuals see more of the content of discussion. The NPA documents also make apparent how each Authority is independent of each other while working within a common governance, policy and legislative structure.

Messages to Emerge - Natural England

Natural England has statutory roles in the designated landscape system including being the 'national landscape advisor', the designating authority and a statutory consultee in the planning system. The response is clear on what more Natural England thinks NPAs and AONB organisations should be doing:

"They should exemplify integrated, landscape-scale approaches to management that improve their natural capital assets for people in and beyond their boundaries. They should adopt a more coherent national voice as a key part of the Defra family to deliver more with their resources for a healthier natural world. Designated landscapes can play a major role in delivering the 25 YEP by well targeted and informed management and action, for example, as a key part of the Nature Recovery Network, piloting environmental net gain, delivering carbon sequestration, piloting the new Environmental Land Management System (ELMS) and forging green connections with urban populations." (Natural England, 2018, p.1)

The response goes on to state that Natural England can help to achieve these changes to play their role in championing the 'designated landscape family'. As is reflected in the quote above, achieving the 25 Year Environment Plan is the major theme running through the response. The recommendations contained in the response include:

- More working together as a 'family' to achieve a national 'voice, profile and brand'.
- More resources and 'capability building' for NAAONB and NPE.
- Make AONB organisations statutory consultees in the planning system.
- Address the lack of diversity on NPAs and make national appointments to AONBs.
- Look at creating more AONB Conservation Boards.
- Strengthen the duty on other public bodies to have regard to designation.
- Improve funding arrangements including link with delivery of national environmental objectives.
- Ensure management and local plans feed into achieving national environmental objectives and priorities.
- Improve evidence collecting and monitoring.
- Implement a series of changes to improve the designation process.
- Encourage measures to attract a greater diversity of people to designated landscapes.

There is a lack of clarity on the specific recommendation with regard to delivery of land management policy. The response states that:

"Strengthened land management plans, with clear targets and performance criteria, could potentially provide a local framework to support Environmental Land Management System, informing land managers of locally and nationally coherent priorities for landscape-scale activities" (Natural England, 2018).

However, it is not stated how this should be delivered and the role the NPAs and AONB organisations should have. The theme of the delivery of ELMS is also prominent in the responses from the NGO sector.

Messages to Emerge - Campaign for National Parks

The Campaign for National Parks argue that the National Park purposes have stood the test of time but that some updates are needed to the overall vision and a series of policy innovations are needed to address the threats to the Parks (CNP, 2018a). In particular CNP argue that:

- A new vision to connect National Parks to 25 Year Environment Plan is needed.
- The duty of other public bodies should be strengthened including a requirement to produce statements on how organisations fulfil this stronger duty to be published in management plans.
- More support for sustainable transport is needed including trials of road pricing.
- NPAs should have increased responsibility for the delivery of land management policy.
- There should be more emphasis on cultural heritage.
- More powers and resources are needed to maintain and enhance the Rights of Way network.
- A national requirement for additional council tax to be paid on second homes and appropriate tax on properties registered as holiday lets is needed. There should be a requirement for planning consent for change of use to second home/holiday let.
- More emphasis on the delivery of affordable housing is needed.
- The proportion of nationally appointed members should be maintained. Reductions in the size of some NPAs are needed.

- Reforms to governance are essential.
- A national body to champion designated landscapes is required with eight specific responsibilities. This new body should be funded through re-allocation of existing protected area resources.
- More secure multi-year funding arrangements for NPAs alongside encouragement to engage in more innovative fund raising activity is required.
- The case for new designations should be examined. CNP are not championing any specific area. If there are new National Park designations there should be no dilution in funding to existing Parks.
- There is the potential for a maritime dimension to the system if new coastal Parks are created.

Throughout this submission extensive reference is made to the CNP report 'Raising the bar: Improving nature in our national parks' (CNP, 2018b). Nature recovery was already high on the national agenda for the leading national parks charity before the Glover review was commissioned. However, working across designated landscape types was not. Almost all the content of the Campaign for National Parks response refers solely to National Parks. It is striking how little attention the AONBs are given, National Parks are largely conceptualised as a system in their own right that should not be 'diluted' rather than part of a wider system of what, since Glover, have been conceptualised as 'national landscapes'.

Messages to Emerge - Friends of the Lake District

At the more local level the focus on the single biggest and longest established 'friends society' has been on protected landscapes. The Friends of the Lake District view themselves as covering the Cumbrian AONBs as well as the National Park. Hence this response looks beyond National Parks to include detailed recommendations for AONBs as well. It uses the concept of a single system of designated landscapes extensively in the response. Key points of interest in this detailed document include:

- The case for a strong, central co-ordinating body for designated landscapes to ensure that they are well managed and that they are 'championed' nationally.
- Support for three key areas of consensus in the NPA and AONB responses i.e. delivery of land management policy, more secure 'multi-year' funding packages and a stronger duty on other public bodies.
- The need for more emphasis on natural and cultural heritage.
- The argument that the Sandford principle should be better implemented and that a reconsideration of the concept of quiet enjoyment is necessary in order to ensure that recreation is compatible with the first purpose.
- That planning documents produced by AONBs should have statutory status.
- An interest in the potential for designating new areas and changing the designation type. Specifically, "areas such as the North Pennines AONB may be a prime candidate for National Park status and there is potential to link this as a whole with existing designations of the Yorkshire Dales, Nidderdale AONB and the Forest of Bowland AONB." (FLD, 2018)
- The need to retain the balance in favour of national representation on NPAs while ensuring that training is provided at induction stage for all Park/AONB staff and members.
- There should be no direct elections to NPAs but more local involvement in forums etc.

In the wider NGO sector the theme of needing to look at the system as a whole to create more linkages is also apparent.

Messages to Emerge - National Trust

The National Trust response also uses the concept of designated landscapes to discuss both AONBs and National Parks. As the single largest conservation charity in England it has a role as both a major land owner with holdings in most of the designated landscapes and as a policy advocate with an interest in the system as a whole. It highlights the importance of partnership working, arguing that AONB organisations have become adept at this to achieve much with sparse resources. They acknowledge that some of the NPAs are getting better at partnership working but suggest that in general the NPAs are far more inward looking. The consultation response draws on past work the National Trust has done on AONBs including a 2015 report on AONBs and development which highlighted the weaknesses in the system (National Trust, 2015). Again, this is a detailed response which argues that the following actions are needed:

- Promoting understanding of AONBs so that it is recognised that they have equal status of protection.
- For NPAs and AONB organisations to better protect nature.
- Better implementation of the Sandford principle in National Parks and its introduction to AONBs.
- Improving AONB organisation governance through independent Secretary of State appointed chairs and more independent members with specific expertise.
- Improving NPA governance to better represent national interests and produce more innovation. The response argues that currently, "highly localised and smaller scale concerns" are "being given precedence over consideration of the national context and needs of the population of the nation as a whole" (National Trust, 2018).
- For either Natural England or Defra to provide more guidance on what designated landscapes should be achieving and facilitating access to expert advice.
- Stability in funding arrangements as well as funding increases.
- For national economic development programmes to better recognise the economic and social contribution of protected landscapes.
- Place more emphasis on better supporting existing designations rather than looking to create new designated areas.
- Examine the case for marine and coastal designations.
- Produce further guidance on the purposes and duties to ensure relevance to full range of societal and environmental concerns.

The Trust argues that NPAs and AONB organisations should be involved in land management policy but in the context of a national programme. The response states that, "the system must have a clear national framework and objectives, transparent lines of accountability and be able to combine these with local priorities through a flexible toolkit" (National Trust, 2018). It goes on to discuss the need for a 'local offer' to deliver a plan led approach but does not state which organisation(s) should be responsible for administration.

Messages to Emerge - Campaign for the Protection of Rural England (CPRE)

The CPRE submitted an exceedingly detailed response reflecting its long standing campaigning

focus on the landscape preservation. It often deals with the specifics of National Parks and AONBs separately reflecting the high level of understanding of the frameworks in which they operate and the experience across the different areas. Recommendations of particular interest include:

- The case for strengthening the duty on other public bodies and increasing funding.
- The need to do more on nature conservation.
- The need to address affordable housing and sustainable transport.
- The case for opening up access to new groups and ensuring everyone has opportunities to visit.
- The need for more 'holistic' planning in AONBs including shared policy frameworks where the designation includes multiple local authorities, statutory consultee status and more resources.
- A new designation programme focusing on improving access to the network and to tackling the 'unfinished business' from Hobhouse.
- The case for national appointments to AONB organisations to achieve more independence and giving them a 'legal status and statutory duty to implement management plans'.

The CPRE response does not recommend any changes to the purposes or duty and does not advocate any change to NPA governance. It is very detailed on the future of land management policy stating that:

“Development of the Environmental Land Management Scheme (ELMS) should ensure expertise from NPAs and AONBs is incorporated into the design of both universal and targeted levels for their area; and for them to play a key role in the delivery of the scheme” (CPRE, 2018, p.6)

It goes on to set out how this should work arguing that the design and delivery of schemes should be delegated to NPAs and AONBs with funding to help them build capacity to do this.

Messages to Emerge - National Farmers Union (NFU)

The dominant message from this response is that farmers have a mixed experience of the consequences for them of operating in a designated landscape. They argue that there is 'good engagement' where NPAs and AONB organisations recognise the need for 'productive farming businesses'. Seven positive specific examples are cited but some negative ones are also used to convey their message that designation means extra costs to farm businesses particularly through planning constraints and conditions. The response covers both National Parks and AONBs, although it is not very sophisticated on the differences. It suggests repeatedly that AONBs are a grade down from National Parks. Specific recommendations include:

- Strengthened socio-economic duties so that this is given equal weight to the purposes.
- More recognition of the imperative for farm businesses to modernise and adapt including a stepping up in the consultation of farmers in decision making.
- Action to improve public understanding of farming, including school visits, but also more intervention in visitor management.
- A series of specific issues relating to environmental land management policy and its monitoring.

The NFU do not have an appetite for extending the system and are also concerned that AONBs are not 'upgraded' to National Parks. Furthermore, they seem to reject the idea of local delivery of ELMS by National Parks and AONB organisations, instead they advocate:

“Future Government support to farmers should be through a nationally determined framework delivering fairly to all farmers across the country. To achieve national consistency future schemes must be determined and designed at a national level” (NFU, 2018, p. 8).

As we might expect the NFU response is distinct in its tone and recommendations from the voluntary sector conservation bodies. Critically it seems that the idea of NPAs and AONBs being closely involved in the delivery of locally tailored ELMS may well be contested by farming organisations. This response is also distinct in arguing for a third socio-economic purpose of equal weight to the conservation and recreation purposes.

3. The Glover Review Report: Content and Reactions

In July 2019 the interim Glover Review report was published. This was followed swiftly by the publication of the final report in September 2019. Critically in the intervening two months there was a change in Prime Minister and Secretary of State at Defra. Michael Gove, who has originally commissioned the review, was replaced by Theresa Villiers. The Glover Review final report contains twenty seven proposals. These are listed in full in appendix two.

The report begins by highlighting how much is currently achieved across the forty four designated areas with relatively few resources. It starts with praise but moves rapidly to a critique. The central argument is that there is poverty of ambition and finance. As such it argues there are major failings with regard to both the natural environment and facilitating access for the country as a whole. The reasons for these failings are argued to lie in the structure of the system:

“Today, we have a system which is fragmented, sometime marginalised and often misunderstood. Indeed it is not really a system at all, but ten national parks who do not always work together effectively, and an entirely separate network of thirty four less powerful AONBs. They have different purposes from National Parks, vastly less money, but sometimes greater pressures; and yet cover areas that are more visited, sometimes more biodiverse and are just as beautiful” (Glover, 2019, p.9).

To tackle this fragmentation it is argued that a new way of working is needed with a new organisation at its heart:

“...our central proposal is to bring National Parks and AONBs together as part of one family of national landscapes, served by a shared National Landscape Service (NLS) which will give them a bigger voice, bigger ambition and a new way of working to meet new challenges” (Glover, 2019, p.9).

From the twenty seven proposals, and the analysis contained in the final report, we can see four inter-connected agendas for change that are the major focus on the Glover's findings, form the basis of the reports structure and resonate strongly with the content of the consultation responses.

- doing more for nature
- delivering diversity and inclusivity
- action for communities
- governance change to deliver more effective AONBs and create a new National Landscape Service

Attention was also given in the final report to the creation of new designations and changes to existing ones. These are likely to receive comprehensive attention elsewhere hence we have decided to focus on the priorities for change in the existing system in this discussion paper. In the remainder of this section we look in more detail at Glover's recommendations of the four key themes before turning to the reactions of the key organisations.

Doing more for nature

The report is fundamentally based on an acceptance of the findings of the Lawton Review (2010). Glover argues the case for nature recovery – that we need to restore what has been lost on an

urgent basis. The key mechanism for this is the local management plan underpinned by evidence gathering on the state of the natural environment. The argument is also made for integrating the challenges of climate change, with the themes of tree planting, peatlands and 'wilding' highlighted. Glover wants national landscapes to be leaders in Nature Recovery Networks that work at a landscape-scale. This will be require more partnership working and a central role for a new National Landscape Service.

The report advocates no change to NPA planning powers but argues for AONB organisations having statutory consultee status and for local plans for AONBs. Following the case made widely by respondents to the consultation, Glover recommends stronger wording so that other public bodies must pay more attention to the special status of national landscapes and have more regard to management plans.

There is a paradox apparent in the report once it moves onto ELMS. On the one hand Glover acknowledges the pivotal importance of ELMS to the past and future stating that “...it is obvious that ELMS, if it comes in as proposed, will have a bigger effect on our national landscapes than anything else being planned by government” (Glover, 2019, p. 56). However, it is something he shies away from commented in detail upon as “this is not a review into farming policy. Plans for ELMS will apply to the country as a whole, not just to national landscapes, and are being developed elsewhere in government” (Glover, 2019, p. 56). To reinforce his comment that farming reform is being dealt with elsewhere Glover's recommendations with regard to ELMS are relatively brief. One page of the report is devoted to specific detail on how ELMS should work with a further three pages on the role of farming and working with farmers. The specific details include:

- Management plans should guide landscape-scale priorities for payments for public goods.
- Other payments, for woodlands or rural development, should reflect management plans.
- Schemes should be flexible, long term and locally adaptable.
- Priority should be given to nature recovery.
- Schemes should support a broad range of public goods.
- Schemes should support the people and cultural traditions of national landscapes.

Delivering diversity

Glover goes back to John Dower's writings of the 1940s to argue that national parks “were meant for everybody” (Glover, 2019,p.15). National landscapes are argued to be too exclusive with too little done to encourage first time visitors. The report advocates a new mission for people to be enshrined in law. Specifically he recommends:

- every child spending at least a night in a national landscape
- programmes of outreach to minority groups
- social prescribing
- more volunteering
- a massively expanded ranger service as part of a new National Landscape Service.

Action for communities

This theme is centred on the value of 'lived in landscapes' with the recommendations focusing on how to support building stronger local communities. The three specific recommendations in this theme are:

- a third statutory purpose on social and economic well-being to replace the weaker existing duty.
- A new National Landscapes Rural Housing Association to build affordable homes for rent.
- A more active role for national landscapes in sustainable transport

Governance change

The central recommendation in this theme, as set out in the introduction to the report as a whole, is the creation of a National Landscape Service. This is argued to be the organisation that can create greater cohesion within the system so that national parks and AONBs work much more effectively together. Glover describes the distinction between AONBs and national parks as having “created an unhelpful two tier system” (p.129) which is holding them back. Other specific recommendations include:

- updated statutory purposes that cover both designations
- modernising of boards/authorities including reductions in the number of members, emphasis on attracting a more diverse range of members and more strategic direction.
- A new funding model that includes greater stability in the grant levels and a range of commercial and charitable sources of income.
- Renaming of AONBs as national landscapes.

Initial reactions to the recommendations

The initial reaction to the final report was largely one of cautious welcome. Virtually every response used the word 'ambitious' with terms such as 'thorough' and 'challenging' frequently appearing. There was no serious contention of the key recommendations on nation and diversity or on the status of AONBs. The organisations whose consultation responses were analysed above tended to highlight where 'their' recommendations has been taken up while also pointing to an area of concern. The majority of organisations, like Defra, stated that they would be taking time to examine the report content and recommendations in much more detail before any further response.

The emphasis on the natural environment was met with widespread approval. For some campaigners Glover does not go far enough (Avery, 2019) while the NFU is, perhaps, cautious reiterating that food production and caring for the environment go 'hand in hand'. The existing nature conservation work that organisations were doing featured heavily in the responses to the Glover report. Natural England highlighted schemes already being undertaken with NPAs on ELMS and peatland restoration (Juniper, 2019). The NAAONB outlined how they had made nature the major theme of their 2019 conference with the subsequent publication and work on 'The Colchester Declaration'. NAAONB also welcomed the prioritisation of designated landscapes for ELMS stating that “AONB teams are ideally placed to be able to support delivery of these systems” (NAAONB, 2019).

In the national parks family the theme is also one of Glover confirming the case for the existing 'direction of travel' and mandating them to go further for nature. The central place of ELMS in this is apparent. National Parks England has been working on how ELMs could work in National Parks. In August 2019 it issued a press release on the future of farming in the Parks (NPE, 2019). At present there is concern that policy hiatus risks seeing a major reduction in land covered by

environmental agreements. Since 2015 there has already been a twenty percent decline in the number of Stewardship agreements covering farmed land in the Parks (NPE, 2019). In addition to action to address this, NPE is campaigning for all the national parks to be covered by the pilot scheme for ELMs due to start in 2021.

The theme of diversity and inclusivity, opening up national landscapes to all, was universally welcomed. The need for this has aroused no critical comment. Again, the tendency has been to highlight what is already being done. For example, the Chief Executive of the South Downs, Trevor Beattie, commented in a press release “it’s good to know we are on the right track” before highlighting the work they were already doing to give young people a night under the stars (SDNPA, 2019).

Likewise, addressing the status, powers and resourcing of AONBs seems to be viewed as a long overdue change. NAAONB is fulsome in its welcome of all the recommendations that relate to this theme including a name change to 'national landscapes' (NAAONB, 2019). Reflecting the influence of the Glover review process and report the NPAs and CNP are starting to talk more in terms of national landscapes and partnership working across them. The recent documentation and web content of these organisations is seeming to make more reference to AONBs. It has been interesting to see that the ideas of a 'third purpose' and a 'national landscapes housing association' have, to date, attracted relatively little comment although CPRE has voiced concerns about the consequences of the third purpose (CPRE, 2019).

The more controversial themes in the recommendations has been the concept of the National Landscape Service and governance reform. While the Campaign for National Parks (CNP, 2019) and Friends of the Lake District (FLD, 2019) have welcomed the idea of creating such a service in their press releases, Natural England have stated that “...these recommendations are all firmly within Natural England’s power, remit and vision” (Juniper, 2019). The National Trust lies somewhere in between first saying that they would be pleased to see the creation of the new service but making the caveat that it should build on the work of existing organisations rather than “starting from scratch” (National Trust, 2019). The NFU make no specific comment on the National Landscape Service recommendation with NFU President Minette Batters stating that “National Parks and AONBs need to work with farmers to develop policy that is suited to the specific landscape” (NFU, 2019).

This discussion paper has been written in the weeks following the Glover Report publication. We expect more detailed responses to emerge in time including, crucially, Defra's plans for action. Glover's recommendations are just that – ideas for the future not plans for legislation or commitments to spending. Given the inevitability of a General Election by the end of 2019 and the subsequent uncertainty as to whether Defra will take any action as a result of the Glover recommendations the focus of the final section is what could and should be achieved for designated landscape working within the legislative and resource status quo. What can be delivered with public money that is already committed using the existing organisations?

4. Working towards a “happier, healthier, greener, more beautiful and open to everyone” future?

The reactions to Glover both as an ongoing review and final report show there is an appetite for change. If the reactions are to be believed there is a willingness to step up current levels of activity and embrace more partnership working. The problem that the managing organisations now face is how to achieve this in the current political context. How can they be more ambitious given the levels of uncertainty and the likelihood that national landscapes will be well down the public sector priority list for the foreseeable future? In this section we look at four key themes of the report focusing especially on 'doing more for nature' as the area where there is the greatest potential for positive change.

The prioritisation of nature recovery in designated landscape policy was already well underway before the Glover review concluded. His report provides added impetus, but the critical changes to policy and practice all depend on post Brexit national agriculture and environment policy. This is openly acknowledged in the Glover report but, as we highlighted above, it is a paradox that this most crucial of policy areas received relatively little coverage because it was deemed to be beyond its remit to say much about national agriculture policy. The brief text on what ELMS in national landscapes should ideally look like is disappointing in its brevity. To make a difference for nature we need carefully designed ELMS that take into account the detailed research on past schemes and our collective knowledge on farm businesses and the farming community.

There are five key interlinked points which form the context for understanding the importance ELMS to the national landscapes. First, the ongoing economic vulnerability of farming. Official statistics provide information on the different farming sectors. Although farms within the national landscapes fall into the full range of sectors grazing farms tend to predominate in these landscapes. The statistics for 2017/18 (Defra, 2018c, p.8) show that for lowland grazing farms the average income was £21,900 with £3,400 coming from agri-environment payments, £8,100 from diversification and £16,500 from the Basic Payments Scheme. Agricultural activity made a loss of £6,100. For upland grazing farms the loss on agriculture was even greater at £12,500. Positive average farm business income (£28,300) was the result of income from agri-environment schemes (£12,000), diversification (£2,900) and the Basic Payment Scheme (£25,000). Given the current state of farming it is no surprise that detailed research on the impacts of Brexit on English farms shows that under every scenario we are highly likely to see a significant number of bankruptcies in all sectors. There will be particularly significant effects on upland farming (Hubbard, 2018). Income from the combination of agri-environment, diversification and direct payments is critical to the status quo with the support available through ELMS likely to play an even greater role in a post Brexit future where income from agricultural activity is liable to be even more uncertain.

Given the statistics on the losses being made on agricultural activity on many grazing farms a sensible question might be why people continue to farm at all, and in particular, why they continue to graze stock. This leads to the second point. The design and content of ELMS must work with the motivations and positive behaviours of farmers if policy is to be successful. This is not to advocate simply giving farmers money in an unconditional manner but to argue that farmers need to be able to earn a living in a way which both creates public goods and also sustains their sense of pride and identity. Research consistently shows that farmers continue to farm because they want to produce food and see being able to do this as the route to future profitability. In a recent study by Franks et al (2019) the majority of upland farmers surveyed responded that they saw the answers to their problems as more grants and direct payments that supported food production not environmental goods. Low profitability has forced many to engage with agri-environment schemes as a route to

staying on the land but it seems the majority still do not see environmental public goods as their core business. Furthermore, many have criticised the current schemes as problematic. Hence recent work on piloting ELMS has focused on designing schemes which work in a very different way and seek to engage farmers more directly in achieving the desired outcomes. Early results from a Yorkshire Dales pilot on results based schemes are encouraging in the sense that all the farmers involved in the first three years have volunteered to continue with the next two years of the project (Le Coq, 2019).

But given the likelihood that many of those who are reluctant to focus on providing public goods over traditional farming activity will be forced out of business in the next couple of years anyway why should we be concerned with designing schemes to prevent this happening? This leads to our third and fourth points – the well-being crisis in farming and the role of farming in the environment and cultural landscape.

It will be imperative to get ELMS right to help mitigate the welfare crisis in farming. For decades farming has been recognised as having one of the highest suicide rates of any occupation and mental health has been a major concern of farming welfare organisations. Farmers have also tended to struggle to access help. This has resulted in the foundation of charities nationally and regionally to help address these specific needs. The 'restructuring' that will be the result of Brexit is expected to bring many more individuals to a point of crisis. A 2019 study in Wales found that more needed to be done to protect against the negative effects of Brexit on health and well-being (Public Health Wales and Mental Health Foundation, 2019). Hence the support available to farm businesses is important to prevent and address the impacts on people and communities. This includes the options for funding public goods as well as the direct 'well-being' support services. In short ELMS need to provide hope for the future of businesses as well as delivering for nature. The delivery mechanisms also need to be mindful of the impact on individuals' health of the sort of help that they get to access schemes. In other words having contact with knowledgeable and supportive people helps farmers to understand what can be achieved with their business. It will be a major challenge to bring hope not just further regulation.

The fourth point has an extensive literature and was covered by the Glover review report. Our national landscapes are cultural landscapes that need farming practices to be sustained and to retain their visual aesthetic. The risks associated with a major 'restructuring' are essentially unknown. An optimistic outlook might point to the potential for other farmers to expand their businesses and improve their profitability or for 'wilder' areas to grow in extent. However, there are risks associated with both of these scenarios and with the other potential outcomes. Major change at a rapid rate is unlikely to be positive for either resident communities or visitors. The impacts on the environment and nature are, at best, likely to be mixed.

The fifth point relates to what is already working. There is a long history of the NPAs and AONB organisations being directly involved in facilitating entry to the agri-environment schemes that have been part of the CAP for the last four decades. This has been in recognition of the massively greater resource which these schemes have represented compared for the budget for conservation in protected areas and/or any national government environmental scheme. The work also recognises the importance of farming to the cultural landscapes that were the basis of designation. In other words NPAs and AONB organisations have sought to support farming communities in this very practical way at a time when farm incomes have been consistently low because the landscape would not be the same without them. As Glover articulates to large extent the first purpose has been delivered through agri-environment policy since the 1990s. European rural socio-economic

development schemes, primarily LEADER, have also played a role, providing access to funding for investment either on farm or for businesses associated with farm families. They have helped farmers and their family members secure their income and livelihood in a way which also invests in nature conservation or least does not harm the natural environment. These schemes have brought conservation benefits but, as noted above, are seen as problematic by farmers and conservationists alike. The more forward thinking NPAs and AONB organisations have sought to make best use of the national system while recognising its imperfections. This is also why National Parks England have highlighted falling amounts of land covered by stewardship agreements as a challenge which the NPAs are currently investing in addressing (NPE, 2019).

Given these five points how can ELMS be designed to deliver more for nature in the national landscapes? The Glover report set out some principles which should guide the future of ELMS specifically:

- Management plans should guide landscape-scale priorities for payments for public goods.
- Other payments, for woodlands or rural development, should reflect management plans.
- Schemes should be flexible, long term and locally adaptable.
- Priority should be given to nature recovery.
- Schemes should support a broad range of public goods.
- Schemes should support the people and cultural traditions of national landscapes.

Hence the argument is made for locally tailored ELMS which include a socio-economic element and which NPAs and AONB organisations are directly involved in. What is needed now is more detail on how ELMs will operate drawing on the lessons from the ELMs pilots and the body of research on the experience of the last four decades of agri-environment schemes. Key questions include:

- How will local tailoring be achieved in practice?
- How far reaching will be NPAs and AONB organisations responsibilities be with regard to delivery of ELMs?
- Will they continue to be largely facilitators advising and encouraging but leaving decisions, scheme agreements and monitoring to a national government agency?
- Can or should they be more involved in monitoring and evaluation?
- What does 'local' mean in this context? Park/Area specific or groups of national landscapes?
- How do we work at a 'landscape scale'? To what extent should farmers be incentivised to collaborate?
- What about areas of common land?
- How far reaching should any rural development element to ELMs be?
- How would rural development under ELMs relate to wider national economic development programmes?
- Is results based payment the way forward? Are there other forms of innovation on payment and results that need to be trailed?
- What constitutes a public good? Who decides what a public good is?
- How can the system support the mental and well-being of individuals and communities involved in land management?
- How can non engagement with landscape-scale scheme be tackled?
- How can design and operation of schemes incorporate farmers pride and identity?
- How can the benefits of schemes be communicated to resident communities?

- How can the benefits of schemes be communicated to the wider public?
- What mechanisms do we need to learn lessons and improve the way schemes operate?

The conservation of designated landscapes relies on developments in a much broader policy and legislative arena with a range of powerful players who are not primarily concerned with national landscapes. Unless the national landscapes work together to make clear proposals that are based on the relevant evidence, and sustain work to lobby central government, ELMS will not deliver nature conservation or contribute as fully as possible to the purposes. We have already seen National Parks England be highly proactive on lobbying on the future of agriculture policy (NPE, 2019) as well as activity by the AONBs. Perhaps this will become a test of how effectively all the 'national landscapes' can work together to be an effective voice in national policy?

In many respects it should be relatively straight forward for NPAs and AONBs to further improve their record on attracting new audiences. What it requires is the financing of the kind of project and ongoing work that is required to introduce new groups to the countryside and to ensure specific needs are met through the visitor infrastructure. Previous projects and existing facilities which are succeeding in bringing in new audiences provide an evidence base for how to develop this area of work. Critical to the rate of progress will be investment – both new the availability of new funds and the willingness to prioritise limited existing resources. Legislative change is not required but a will to make decisions that will result in action will be.

Reform to the way in which the system works may be harder to achieve. Given that it is unlikely that new legislation will be forthcoming it will be down to those already most involved in governance to implement evolutionary change to the system. There is a clear consensus for change in the diversity of those running national landscapes but, constraints are likely to impede the rate of progress. While NPAs can look to recruit a more diverse cross section of Secretary of State appointees they have limited control over the local authority and parish council members. Even with national Secretary of State members the ability to select relies on receiving sufficient numbers of quality applications from people from a wide cross section of society. Achieving this through the public appointments system without investment in new forms of marketing and recruitment strategies is likely to be a challenge for most parks. Likewise, for AONB organisations there is the question of how a more diverse membership can be recruited and how they can achieve a more national perspective within current organisation types.

The final issue is that of addressing the status of AONBs. There was a striking difference between the level of change advocated in the National Park Authorities and AONB organisation responses to the Glover Review consultation in 2018. The National Parks made a case for more direct resources and a pivotal role in the delivery of land management policy in their areas. They wanted a stepping up in status with regard to the duty on other public bodies to take account of their purposes and management plan but essentially they argued for changes that will allow them to do what they already do better. For the AONB organisations the stakes were higher. They too want resources and status but they are also asking for new purposes, a new duty on them and much more effective powers. They also asked for something which is beyond the Review, or any change to legislation or funding increase to achieve - to be seen in the eyes of the public as the equals of any National Park.

If the Glover Review achieves nothing else it will be remembered as the point at which a clear and reasoned argument was made for the status, resourcing and powers of AONBs to be made explicitly equal to national parks. Glover has given us the concept of the 'national landscape' even

if the lexicon of designation will continue to maintain a difference between a 'park' and a 'landscape'. If the past can be characterised as a two tier system, in which the AONBs were the poor relations and the NPAs too insular for their own good, then the future must be one of partnership working to secure the policy changes and funding needed to make a difference for people and nature across England's designated landscapes. Work to influence the design and delivery of ELMS across the national landscapes in the forthcoming year will be a key test of whether the managing organisations are capable of achieving ambitious partnership working.

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Appendix One

Internet searches were performed to access publicly available consultation responses/draft responses. Some responses were also accessed via contacts in the sector.

The table below outlines what was available from the National Park Authorities. National Parks England also published their response in full via their own web site.

National Park Authority	Source Document
Dartmoor	Paper discussed at full NPA meeting 7/12/18
Exmoor	Paper discussed at full NPA meeting 4/12/18
New Forest	Full response
South Downs	Full response
The Broads	Paper discussed at full NPA meeting 23/11/2018
Peak District	Paper discussed at full NPA meeting 7/12/18
Yorkshire Dales	Paper discussed at full NPA meeting 18/12/18
North York Moors	Paper discussed at full NPA meeting 17/12/18
Lake District	Paper discussed at full NPA meeting 12/12/18
Northumberland	Paper discussed at full NPA meeting 14/12/18

Information on the AONBs response was harder to access. Despite searching individual AONB partnership/conservation board web sites only the following were available:

National Association for AONBs
Shropshire Hills
Chichester Harbour
Forest of Bowland
Cornwall

Access to the full responses of other organisations was also obtained via the relevant organisations web site. These included:

Campaign for National Parks (CNP)
Campaign for the Protection of Rural England (CPRE)
Friends of the Lake District (FLD)
Landscape Institute (LI)
National Farmers Union (NFU)
National Trust (NT)
Natural England (NE)

Appendix Two – Proposals contained in the Glover Review Final Report

1. National Landscapes should have a renewed mission to recover and enhance nature, and be supported and held to account for delivery by a new National Landscape Service.
2. The state of nature and natural capital in our national landscapes should be regularly and robustly assessed, informing the priorities for action.
3. Strengthened Management Plans should set clear priorities and actions for nature recovery including, but not limited to, wilder areas and the responses to climate change (notably tree planting and peatland restoration). Their implementation must be backed up by stronger status in law.
4. National landscapes should form the backbone of Nature Recovery Networks – joining things up within and beyond their boundaries.
5. A central place for national landscapes in new Environmental Land Management Schemes.
6. A strengthened place for national landscapes in the planning system with AONBs given statutory consultee status, encouragement to develop local plans and changes to the NPPF.
7. A stronger mission to connect all people with our national landscapes, supported and held to account by the new National Landscape Service.
8. A night under the stars in a national landscape for every child.
9. New long-term programmes to increase the ethnic diversity of visitors.
10. Landscapes that cater for and improve the nation's health and well-being.
11. Expanding volunteering in our national landscapes.
12. Better information and signs to guide visitors.
13. A ranger service in all our national landscapes, part of a national family.
14. National landscapes supported to become leaders in sustainable tourism.
15. Joining up with others to make the most of what we have and bringing National Trails into the national landscapes family.
16. Consider expanding open access rights in national landscapes.
17. National landscapes working for vibrant communities.
18. A new National Landscapes Housing Association to build affordable homes.
19. A new approach to co-ordinating public transport piloted in the Lake District, and new, more sustainable ways of accessing national landscapes.
20. New designated landscapes and a new National Forest.
21. Welcoming new landscape approaches in cities and the coast, and a city park competition.
22. A better designations process.
23. Stronger purposes in law for our national landscapes.
24. AONBs strengthened with new purposes, powers and resources, renamed as National Landscapes.
25. A new National Landscape Service bringing our 44 national landscapes together to achieve more than the sum of their parts.
26. Reformed governance to inspire and secure ambition in our national landscapes and better reflect society.
27. A new financial model – more money, more secure, more enterprising.