



A Cotswolds National Park Position Statement

Discussions over whether the Cotswolds should be considered for designation as a National Park have steadily grown over the last two years. These discussions chime with the Government's 25 Year Environment Plan, launched in January 2018 and the Glover Review of National Parks and AONBs, which commenced in June 2018 and is due to report in 2019.

In this Position Statement the Board outlines the broad case for the Cotswolds to be considered for designation as England's next National Park.

Introduction

The Cotswolds is an ancient naturally bounded settlement area identified by man as far back as the Anglo Saxon period. The area represents the best known section of oolitic limestone stretching from the Channel coast to the North Sea. It is often described as the quintessential English rural landscape and reflects the human influences that have moulded it through time.

The underlying limestone, field boundary walls, stone buildings and rolling hills are all seamlessly interwoven. Settlements, both large and small, built from limestone with a common architectural heritage sit within the countryside around them. No other area combines such a high quality landscape with its high quality village and town architecture, the sum of the whole is very much greater than the sum of the individual parts.

The industrial revolution passed the Cotswolds by and until the second half of the 20th century it was largely untouched. Even today much of the landscape is sparsely populated and is remote in feel. It is a unique and stunningly beautiful area.

Operating context

The Cotswolds was originally designated an Area of Outstanding Natural Beauty (AONB) in 1966 and extended in area in 1990. At 790 sq miles or 2,038 sq kms it is the largest of AONBs and third largest Protected Landscape in England, after the Lakes and Dales National Parks.

The statutory purpose of AONB designation is to conserve and enhance the natural beauty¹. It is Natural England's view that the practical application of the natural beauty criteria is identical for National Park and AONB designations, despite there being differences in the degree to which the criterion is clarified in the legislation². It is also the Government's formal position that the natural beauty required of an AONB and a National Park are the same³.

The AONB was designated because of the features of natural beauty which are derived from the geomorphology, the historic land use and the heritage which are evident over the whole area, from the escarpment in the west and through the dip slopes and valleys of the east, and from Bath in the south to Chipping Campden in the north.

¹ Section 82, Countryside and Rights of Way Act 2000.

² Guidance for assessing landscapes for designation as National Park or Area of Outstanding Natural Beauty in England, Natural England, March 2011.

³ See Lords Hansard 20 Mar 2006 (Col 51) and Commons Hansard 13 June 2000 (Col 556W).

The AONB was originally managed via a local authority led Joint Advisory Committee, then a local authority hosted AONB Partnership and from 2004/05 by an independent Conservation Board. The large geographic size of the AONB and its regional and local government complexity led the establishment of the Board.

The Cotswolds Conservation Board is modelled on a National Park Authority and has the following two purposes:

- to conserve and enhance the natural beauty of the AONB and;
- to increase the understanding and enjoyment of the special qualities of the AONB.

and it has a duty to foster the socio economic well-being of local communities.

The Board's membership comprises Secretary of State, Local Authority and Parish appointees, a Board of 37 members modelled on a National Park Authority.

The real challenges of coherently managing such an extensive high quality landscape across 15 local authorities, 5 counties and 3 regions are increasingly clear, and these challenges risk undermining the vision in its original designation as an AONB.

National Park status could provide a more coordinated and consistent approach to the management of the area, putting conserving and enhancing natural beauty and the understanding and enjoyment of the areas special qualities at the heart of landscape management, plan-making and decision-taking.

In June 2018 Defra announced the review of National Parks and Areas of Outstanding Natural Beauty (AONBs). The Review is being chaired by Julian Glover, who is working with a small advisory panel and is due to report in Autumn 2019.

The Review is exploring what might be done better, what changes could assist protected landscapes, and whether definitions and systems - which in many cases date back to their original creation - are still sufficient. Its objectives include examining and making recommendations on the case for the extension or creation of new designated areas.

The Conservation Board recently adopted the Cotswolds AONB Management Plan 2018 - 2023. Within the plan it has an ambition to promote the case for the Cotswolds being designated as England's next National Park.

Headline arguments for considering the Cotswolds for National Park designation

- The landscape: AONBs & National Parks have the same landscape status;
- Designation criteria: the area meets National Park designation criteria;
- The governance model: the Conservation Board is modelled on a Park Authority;
- Parks have evolved from AONBs: South Downs National Park, established in 2010 evolved from the Sussex Downs and East Hampshire AONBs;
- Public understanding and engagement: the public more readily understand and appreciate the title National Park;
- A Park for the South Midlands & West of England: the nearest National Park for Birmingham and Bristol, with significant and diverse urban populations on the doorstep – a geographical gap in the national provision of Parks;
- Consistent planning policy formulation and development management based on the needs of the Cotswolds and implemented for the area as a whole;
- Management of the landscape as a whole, resulting in improved enhancement of the landscape and a reduction in the erosion of landscape quality;

- Consistent sustainable tourism, recreation, countryside access and quiet enjoyment policy development and implementation across the whole area.

The basic criteria for a National Park

- An extensive tract of country in England which it appears to Natural England, by reason of its: natural beauty and the opportunities it affords for open-air recreation, having regard to both its character and its position in relation to centres of population, it is especially desirable that it is designated for National Park purposes.

The Cotswolds AONB meets the designation criteria for a National Park

- The Cotswolds landscape is already acknowledged to meet the natural beauty purpose of a National Park; it is already designated an AONB, with National Parks and AONBs having the same landscape status.
- The Cotswolds already meets the open air recreational purpose of a National Park, having significant existing activity and visitor numbers, which is recognised by Defra and Natural England in the Conservation Board's second purpose being modelled on that of a Park.

The Cotswolds compared to exiting National Parks

- Same landscape value
- Landscape similarities to the South Downs
- Third largest protected landscape
- Largest resident population
- Closer than most Parks to significant urban populations
- Third largest number of day visitor numbers
- Easier to access than most Parks
- Better known than most Parks
- Joint largest number of local authorities
- Smallest Defra financial settlement
- Administratively more complex than most Parks

Pressures on the Cotswolds AONB

- Planning pressures: CPREs review of housing in England's AONBs in 2017 identifies the Cotswolds as one of the most pressurised protected landscapes;
- Infrastructure: Highways England's A417 Missing Link and Network Rail's Great Western line electrification;
- Population and visitors: 150,000 residents and 23 million day visits a year;
- Fragmentation: 15 local authority areas - 8 district councils, 4 county councils, 3 unitary councils; parts of 283 parishes and; straddling 3 regions – the South West, South East and Midlands.

What could a Cotswolds National Park achieve?

- A single Local Plan leading consistent planning policy formulation based on the needs of the Cotswolds and implemented for the area as a whole;
- A more effective and influential landscape led Management Plan for the Park, linked to the single Local Plan;

- Management of the landscape as a whole, resulting in improved enhancement of the landscape and a reduction in the erosion of landscape quality;
- Application of Natural Capital and Cultural Capital to resource management across a whole landscape;
- Design and consistent local delivery of a single integrated rural development and agri-environment scheme;
- Ensure quality design and use of materials appropriate to the area;
- Join up of multiple advisory services and funding streams;
- Enable and lead effective networks for collaboration, co-ordination and delivery with landowners, farmers, businesses and communities across the Park as a whole;
- Experiment and trial new, innovative and entrepreneurial initiatives;
- Enhanced and consistent sustainable tourism, recreation and quiet enjoyment policy development and implementation across the area;
- Co-ordination and delivery of sustainable tourism and visitor management for the whole area;
- Improved and consistent approach to the management of the rights of way network, including design and use of materials appropriate to the Cotswolds;
- Stronger local, national and international brand for the area and the businesses that operate within the area and depend on the brand;
- Clearer identity for the area and the communities living within it, inspiring even greater pride and value in the quality of the landscape and environment;
- More appropriate resourcing and financing settlement for the size and scale of the protected landscape;
- Improved ability of urban communities in the West Midlands, Avon and outer London to access, explore and enjoy their nearest National Park, delivering in parallel significant health and well-being benefits to those diverse populations.

The disadvantages of a National Park

The evidence base for comparing circumstances before with after National Park status is not clear cut. Evidence has very often not been collected or independently assessed at a national level. The potential disadvantages of National Park status are perceived to include:

- A more challenging or restrictive planning system within a National Park.
- Additional red tape or bureaucracy associated with a National Park Authority.
- An increase in house prices as a result of National Park designation.
- More visitors to a Cotswolds National Park compared to the Cotswolds AONB.
- The operation of a National Park having a higher cost to the Treasury.

A Cotswolds National Park Authority's purposes

National Park Authorities have the following two purposes and socio economic duty:

- Conserve and enhance the natural beauty, wildlife and cultural heritage of the National Park;
- Promote opportunities for understanding and enjoyment of the National Park's special qualities.
- A duty to foster the social and economic well-being of local communities within the National Park.

A Cotswolds National Park Authority could readily adopt the same purposes and duty, particularly when the Cotswolds Conservation Board is already modelled on a National Park Authority.

However, a new National Park could serve as an opportunity to develop an updated set of purposes, which might focus on the following:

- Conserve and enhance the natural beauty, natural capital and cultural capital of the area;
- Promote the understanding, exploration and enjoyment of the area and what makes it special;
- Support and promote sustainable farming, tourism, forestry and other economic development of the area;
- Support and promote the social well-being of the local communities of the area.

A Cotswolds National Park Authority's membership

The Park Authority could adopt the same structures of the existing Conservation Board and National Park Authorities i.e. 40% Secretary of State, 40% Local Authority and 20% Parish appointees.

However, the opportunity could be taken to explore alternative arrangements e.g. an equal number of Secretary of State, Local Authority and appointees resulting from direct elections onto the authority.

How would the Park achieve its purposes?

- To be a single environmental delivery body or commissioner acting on behalf of all government departments, delivering and/or investing in a local Cotswold menu of public goods and services;
- To lead the development of a strategic local plan and management plan for the whole area with associated policies to guide development and infrastructure;
- To lead the provision and co-ordination of information and interpretation about the AONB and directly lead or stimulate the provision of informal recreation and access services;
- To lead sustainable rural economic development, the development of a single rural economic plan and its implementation through an associated programme of advice, action and investment;
- To provide a single one stop shop for Park wide advisory services covering; visitor information, rural skills, participation and volunteering, trails and local rights of way, development design, landscape, biodiversity and the historic environment.

What would the Park plans look like?

- Strategic landscape based local plan accompanying or incorporating a Park management plan;
- Park wide strategic plan which stimulates the development of neighbourhood plans with which to inform and achieve local delivery;
- 25 year approach, complementing the Government's 25 Year Environment Plan and Defra's 8 Point Plan for England's National Parks;
- Incorporating Defra and its agencies (Forestry Commission, Environment Agency, Natural England) to provide a single strategic landscape scale vision and plan;
- Applying a Natural and Cultural Capital approach, combining landscape and water catchment based approaches;
- Informing and leading the creation of a local menu for the purchase of public goods and services and investment in rural land management and rural development.

Why it is especially desirable to create a Cotswolds National Park

Any candidate National Park would be assessed by Natural England to determine if it is **especially desirable** to create a National Park. The key criteria used and the related evidence from the Cotswolds in response to the criteria are as follows:

- Cotswolds AONB is an extensive tract of land that satisfies the statutory tests of natural beauty and opportunities for open air recreation:
 - the area is already designated an AONB for its natural beauty, it is already defined as being of equal landscape status to a National Park,
 - the AONB receives 23 million day visitors a year, the third largest of any Protected Landscape and more than the majority of Parks,
 - the Conservation Board has the same enjoyment / recreation purpose as a Park Authority.
- The AONB is of such significance that National Park purposes should apply to it:
 - the Conservation Board already has the same two purposes and socio economic duty as that of Park.
- It is experiencing issues that will affect the area's special qualities, understanding and enjoyment, unless designation occurs:
 - the area experiences significant development and infrastructure pressures and planning policies and development management are not consistent across the whole AONB;
 - CPREs review of housing in England's AONBs in 2017 identifies the Cotswolds as one of the most pressurised protected landscapes.
- National Park purposes are best pursued through the management mechanisms, powers and duties that come with National Park designation:
 - the Conservation Board's purposes, duty and governance structure is modelled on a Park Authority; the Board is already expected to deliver Park purposes, but is not resourced adequately to do so.
- There are other relevant factors that tend to suggest desirability to designate. Such factors include:
 - National Park Authorities have a duty to foster the economic and social wellbeing of local communities within the National Park as they pursue National Park Purposes;
 - the Board has the same socio economic duty as Parks.
 - National biodiversity policy;
 - applies equally to the Cotswolds.
 - National sustainable development policy;
 - applies equally to the Cotswolds, although the AONB is fragmented across 11 local plans.
 - Emerging national policy and procedures for agri-environment schemes post Brexit;
 - the same policy and procedures should equally apply to the country's third largest protected landscape.

Planning function delivery options

Current legislation would result in the National Park Authority being the planning authority for the whole National Park, but it would need to agree with Government and the County, Unitary, District and Borough Councils how best to deliver its planning responsibilities.

Traditionally National Park Authorities have delivered planning functions across the whole Park direct. However the majority of National Parks are smaller than the Cotswolds, have a smaller resident population and a far smaller number of planning applications.

The South Downs National Park shares similarities with the Cotswolds and provides an alternative model for consideration, whereby the Authority:

- Produces and adopts the local plan;
- Originally delegated planning services to all local authorities⁴;
- Currently delegates development control to 5 authorities and contracts with those authorities for the delivery of planning services;
- Delivers planning direct in the remaining authority areas, i.e. some authorities have given back their delegation as it doesn't make sense for them to deliver planning in the Park area since the size of area concerned and/or the number of applications does not warrant or justify separate systems or a delegation;
- Monitors the delegation of the delivery of development control and can decide to call in an application for determination by the Park Authority;
- Informs and substantiates the housing needs of the Park and its communities;
- Works with County and Unitary Councils to agree joint Waste & Minerals Plans;
- Compiles design guidance for when planning applications are being developed and determined.

Housing numbers and affordable housing provision

Government policy requires National Park Authorities to consider the economic and housing needs of the community living in the Park with particular emphasis on affordable housing. The National Planning Policy Guidance under Natural Environment/Landscape refers to the English National Parks and Broads UK Government Vision 2010. Paragraph 78 states: "The Government recognises that the Parks are not suitable locations for unrestricted housing and does not therefore provide general housing targets for them. The expectation is that new housing will be focused on meeting affordable housing requirements, supporting local employment opportunities and key services."

Park boundary

It is suggested that new national legislation could enable a National Park to adopt the existing Cotswolds AONB boundary. A boundary review might then be undertaken after 5 – 7 years of the day to day experience of the Park operating.

The Glover Review will be liaising with Natural England on the process of designating National Parks and AONBs and extending boundary areas, with a view to improving and expediting the process.

Legal status of a Cotswolds National Park Authority

It is envisaged that a Park Authority would be a public sector body, a special local authority as for existing National Parks, a body able to trade and sell services. The Authority could be supported by a National Park Landscape Trust, a membership based charity.

Potential enabling legislation & timescale

Could be established via an Act linked to Brexit legislation. There is potential for a new Park Authority to be established in the mid 2020s,

11 December 2018

⁴ Section 101, Local Government Act 1972. Specified by Hilary Benn MP, SoS at Defra at the time of the establishment of the South Downs National Park Authority