



A Potential Cotswolds National Park

Frequently Asked Questions, FAQs

1. A National Park discussion and debate

Q: What has prompted the debate about the merits of a Cotswolds National Park?

A: The discussion as to whether the Cotswolds should be designated a National Park has steadily grown over the last two years. Comparison with the South Downs National Park landscape has led to questions as to why the Cotswolds aren't similarly designated a National Park. An on line Parliamentary petition called for the new designation. Local MPs advocated that the case for a National Park be explored and debated, having identified that a Park Authority would be more effective at safeguarding the quality of the landscape and environment, achieve a more consistent planning policy approach and benefit the tourism sector. National organisations such as the Natural Capital Committee have advocated new National Park designations and the Landscape Institute's President questioned why such a significant, special and well known landscape is not a National Park. An increasing number of local communities have called for the National Park designation for the Cotswolds to be given serious consideration.

In parallel with these local discussions the Government has launched a national review of National Parks and Areas of Outstanding Natural Beauty (AONB). The Glover Review is exploring a range of issues, not least whether there should be new National Parks. It is taking evidence until mid December 2018 and is due to report in Autumn 2019.

2. Why consider a National Park

Q: What are the main benefits of a National Park?

A:

- The National Park purposes explicitly refer to conserving and enhancing the natural beauty, wildlife and cultural heritage of the National Park, clearly recognising the value and importance of wildlife and heritage,
- The Park purposes include the promotion of the opportunities for understanding and enjoyment of the National Park's special qualities, highlighting the importance of the Park landscapes for recreation and exploration,
- Planning policy focused on the needs of the National Park area and the purpose of designation,
- Reduced number of overall planning policies compared to multiple local authorities operating across the same landscape,
- Better integrated and more consistent decision making across the designated landscape as a whole,
- Strength, identity and public recognition of the National Park brand,

- Greater collaboration across the Park area between organisations to secure new projects and associated resources for the area,
- Clear purposes underpinning Park designation resulting in a clear focus on the management of the Park landscape, environment, access and its special qualities for the long term, reflected in the Park's statutory local plan and management plan.

3. National Parks compared to an Area of Outstanding Natural Beauty (AONB)

Q: So what is the difference between a National Park and an AONB?

A: Both National Parks and AONBs are designated under the same legislation, the National Parks and Access to the Countryside Act 1949 and share the same landscape protection status. National Parks are designated:

- To conserve and enhance the natural beauty, wildlife and cultural heritage of the National Park.
- To promote opportunities for understanding and enjoyment of its special qualities.

The Park Authorities also have a duty to foster the social and economic well-being of local communities within the National Park.

AONBs are designated to conserve and enhance the natural beauty of the AONB.

The Cotswolds Conservation Board is modelled on the Park Authorities and has virtually identical purposes and the same socio economic duty, but a much smaller financial settlement.

While most of the National Parks are relatively remote, sparsely populated upland landscapes, in 2010 the Government designated the South Downs National Park, combining two existing AONBs. The South Downs National Park is very comparable to the Cotswolds in size, population and landscape type. The South Downs National Park Authority receives approximately twenty five times the central funding of the Cotswolds AONB.

Within a National Park the Park Authority is the local planning authority whereas the constituent Local Authorities are the planning authorities in an AONB.

4. Investment in the Environment

Q: Is investment in the environment a priority for Government?

A: In January 2018 the Prime Minister launched the government's 25 Year Environment Plan. It highlighted the priority of the environment and that the natural environment was our most precious inheritance. It emphasised the government's plan for our generation to become the first generation to leave the environment in a better state than we found it and pass on to the next generation a natural environment protected and enhanced for the future. It recognised that farming and forestry land uses are vital industries and that they shape our landscape.

The plan identified the designation of National Parks and AONBs as among the outstanding environmental achievements of the past 100 years.

5. Boundaries of any National Park

Q: Is there any intention to undertake a boundary review?

A: The legislation at present would require a complete review of any new Park boundary. However, there is an alternative idea, that a new Park might adopt the existing successful AONB boundary (dating from 1990) and operate for a period of time to that boundary. There could be a review of the boundary after 5 – 7 years of the Park operating, enabling discussions for any boundary changes to be based on the local day to day experience of the Park designation and Park Authority.

The current Cotswolds AONB boundary is based upon an assessment of landscape qualities dating from 1988 - 1990. It is a coherent natural historic landscape based boundary and does not adopt county, unitary, district, borough or parish administrative boundaries.

The Glover Review may well recommend changes to the current lengthy arrangements for reviewing boundaries of National Parks and AONBs.

6. The difference a Cotswolds National Park would make

Q: What differences would there be after 5 - 10 years if the Cotswolds were to become a National Park?

A: In summary a Park Authority would aspire;

- A single Local Plan leading to 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;
- Consistent high quality development design and the use of materials appropriate to the area;
- Joining up of multiple advisory services and funding streams for communities, farmers and landowners;
- To enable and lead effective networks for collaboration, co-ordination and delivery with landowners, farmers, businesses and communities across the Park as a whole;
- To experiment and trial new, innovative and entrepreneurial initiatives;
- Enhanced and consistent sustainable visitor, tourism, recreation and quiet enjoyment policy development and implementation across the area;
- Co-ordination and delivery of sustainable visitor and tourism management for the whole area;
- Improved and consistent management of the whole 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.

7. Local involvement

Q: What plans are there for public consultation?

A: Natural England as the national adviser on landscape and protected landscape designations would review the case for a new National Park, make recommendations to Government and there would be a full round of consultations as they deemed necessary. The Cotswolds Conservation Board already has a programme of engagement with stakeholders in train, which will continue.

8. Local residents and communities

Q: What would a National Park mean for local residents and communities?

A: The answers in section 2 and 6 outline the potential benefits of a Cotswold National Park, many of which would be benefits to local residents and communities living and working in the Park.

In summary it is envisaged that a Park Authority would:

- Provide strategic plans with clearer sets of planning policies, based upon the needs and capacity of the Cotswolds,
- Proactively pursue local neighbourhood plans and the provision of affordable housing,
- Improve the co-ordination and management of visitor and tourism provision for the Cotswolds as a whole,
- Secure more resources for the improved care and management of the landscape and recreation infrastructure e.g public rights of way,
- Advocate and support investment in appropriate economic growth and jobs.

9. Contribution of the National Park to wider society

Q: What can a National Park designation contribute to the needs of wider society?

A: A national report in 2017 jointly sponsored by Public Health England and the National Park Authorities showed clear opportunities for beautiful landscapes to contribute to improving the physical and the mental wellbeing of the population. Cotswolds GP surgeries are already starting to use social prescribing linked to short local walks. The natural beauty and tranquility of a National Park would offer significant health and well-being benefits to

communities living in the Park and those larger urban communities living within easy reach of the Park, building on the existing innovative work with the Princes Trust and with inner city Gloucester women's walking groups.

10. Democratic representation on a National Park

Q: What model of governance is likely to be adopted?

A: Traditionally a Park Authority comprises no less than 40% Local Authority appointees, at least 20% Parish appointees and up to 40% Secretary of State appointees. Thereby at least 60% of the Park Authority comprises locally elected appointees. The Secretary of State appointments process enables the recruitment of national expertise relevant to the protected landscape, expertise that would not step forward to join a local authority. This is the same model as the current Cotswolds Conservation Board.

The Park Authorities regularly have a series of networks or mechanisms to engage and work with local communities, farmers and landowners e.g. Neighbourhood Plans, farmer cluster groups, whole estate plans.

The opportunity could be taken to explore alternative arrangements e.g. including appointees resulting from direct elections onto the National Park Authority.

11. A Precept or Levy

Q: Would there be an intention to precept or 100% fund from a central government grant and other miscellaneous sources?

A: National Parks are currently funded 100% via the government department, Defra, (Department for Environment, Food & Rural Affairs). The Park Authorities have retained their earlier precept or levying powers although these are not used. The precept power enables Parks to reclaim Vat, unlike Conservation Boards.

A National Park would look to add to its main Defra settlement by seeking and applying for other grants. Parks have been successful in securing investment from the Heritage Lottery Fund, government departments e.g. MHCLG, (Ministry of Housing, Communities & Local Government), government agencies e.g. Natural England and private sector companies. Additional funding programmes include historic building restoration grants, cycle access infrastructure grants – working as individual Parks, groups of Parks or in partnership with other organisations. The Cotswolds Conservation Board also works in this way.

The Park family has recently been working to secure private sector sponsorship, with the most recent example of success being their national programme with the Columbia outdoor clothing company – leading to savings in the Parks' operational budgets.

12. Additional red tape

Q: Won't a National Park simply lead to more red tape and become a blocker on development and innovation?

A: Whether an area is designated as a National Park or as an AONB, the same issues of development control and strategic planning need to be addressed. Arguably, having these determined through a single local plan will create significant opportunity to reduce bureaucracy.

National Parks are living, working landscapes that support rural communities. Farming and planning systems have both led to the recognition, designation and celebration of our National Parks. The Park Authorities have a formal duty to foster the social and economic well-being of local communities within the National Park. Both National Parks and AONBs are afforded the highest status of protection and government policy is that major development should only take place in exceptional circumstances.

As the single South Downs National Park Local Plan is finalised there is a dramatic reduction in the number of planning policies across the area, the result of a single plan looking at the one landscape compared to multiple local plans led by a number of local authorities. Planning policy is clearer and less bureaucratic.

13. Planning powers

Q: What are the preferred arrangements for dealing with planning applications in a National Park area?

A: Traditionally a National Park Authority is the planning authority for the Park area and delivers planning services direct. The South Downs National Park operates a different model. There is a single strategic Park wide Local Plan and Park wide Management Plan. Most planning delivery is delegated to local authorities, with an annual rolling contract between the Park Authority and individual authorities. How such an approach might work in the Cotswolds would be the subject of discussions between the Conservation Board, Defra, MHCLG, Natural England and the constituent Local Authorities.

Within the South Downs National Park the Authority:

- compiles the Local Plan and Management Plan for the National Park;
- works with the County and Unitary Councils to agree joint Waste & Minerals Plans;
- determines all waste and minerals applications;
- compiles design guidance for application when determining planning applications;
- informs and substantiates the housing needs of the Park and its communities;
- delegates the delivery of development control to 5 district councils, (Section 101, Local Government Act 1972);
- monitors the delegation of the delivery of development control and can decide to call in an application for determination by the Park Authority.

The South Downs National Park Authority currently receives circa 4,400 planning applications a year. It determines circa 1,125 or 25% of these as a Park Authority, with the remaining 3,375 or 75% determined by the local authorities under the delegated arrangements.

The South Downs Park Authority has seen the number of planning applications remain the same compared to before the Park. However the Park Authority believes that the quality of the applications has risen due to the designation of the Park and provision of more specific and detailed planning guidance. Applicants recognise that the Park landscape requires a

higher standard of application and planning proposal. The Authority has championed the value of local Neighbourhood Plans, of which there are currently 53 in the Park area, which help identify the need for new housing and development.

The South Downs Park Authority determines 90% of the major planning applications, with major defined by the scale of an application, the sensitivity of the location and the uniqueness of the application.

In general the larger authorities have opted to deliver planning services under a delegated arrangement whilst those authorities with only a small part of the Park or very few planning applications in the Park have opted for the planning function to be delivered by the Park Authority.

A Park Authority would seek to achieve consistent high level planning policy and implementation for the area as a whole.

14. Development plan

Q: With the requirement that a National Park prepares its own local plan what will be the relationship between the adjoining local authorities and any such local plan? Will the local plan have due regard to the policies in the adjoining local authorities?

A: A “duty to cooperate” already exists between National Parks and neighbouring Authorities. The Park Authority would compile the Local Plan for the National Park, and work with the County and Unitary Councils to agree joint Waste & Minerals Plans. It would in addition compile design guidance, mindful of the differing elements applicable to the different areas within the park, for use by applicants and when determining planning applications.

It would clearly set out Park specific policies to guide applicants and for use when determining planning applications.

In respect of the adjoining local authority local plans and core development plans the National Park Authority would work in partnership with the local authorities to understand their housing needs.

Within its draft local plan for the Park the South Downs National Park Authority is advocating circa 700 policies for the Park. This is a significant reduction from the circa 1500 policies currently used by the local authorities across the Park area.

The National Planning Policy Framework (NPPF) advocates that there should be plans for the enhancement of natural capital at a catchment or landscape scale across local authority boundaries. The National Park Authority would be ideally placed to develop such a plan for the Cotswolds.

15. Housing growth implications

Q: Will there be any implications of a National Park designation on housing growth? For example, as district councils have area wide housing growth requirements, will the part in the National Park within the district be expected to make a commensurate contribution?

A: The Park Authority would inform and substantiate the housing needs and housing capacity of the Park and its communities and reflect these in the Local Plan.

Government policy means that National Parks are not subject to top down housing allocations or the proposed standard methodology of assessing housing need. Their purposes require them to consider the economic and housing needs of the community living in the Park with particular emphasis on affordable housing.

The South Downs National Park Authority's draft local plan is proposing 250 new homes a year, distributed or dispersed across the Park, with 125 or 50% affordable houses. This compares to the average of 250 homes a year in the twelve years before Park designation. The housing growth is similar to the past but with far greater emphasis on affordable housing needs. The housing numbers are based on local need and the capacity of the landscape to accommodate growth without development having a detrimental impact on the Park.

Research led by the Campaign for the Protection of Rural England (CPRE) in autumn 2017 identified the Cotswolds as one of the AONBs under the greatest development pressures nationally.

The practice of the Cotswolds Conservation Board has been to support the proportionate organic growth of its communities with support for both housing and employment where they do not conflict with the core purposes of the AONB designation and Conservation Board.

16. Property values and housing affordability

Q: What consideration is being given to housing affordability issues in a new National Park?

A: The National Planning Policy Guidance under Natural Environment/Landscape refers to the English National Parks and Broads UK Government Vision 2010 for information on National Parks. It 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."

The Cotswolds are already well known both nationally and internationally and the area has good access to London, Bristol and Birmingham. As a result the area is extremely popular, market housing prices are relatively high and there are significant numbers of second homes. It is not envisaged that National Park designation would therefore lead to any significant increase in house prices.

17. Balance between recreation and quiet enjoyment

Q: While it is recognised that the Cotswolds already is a major visitor destination which helps support the rural economy, a National Park could attract more visitors. Therefore what balances are being sought between retaining the character of the area and balancing increased demand for visitors?

A: National Park Authorities in England have the following two purposes:

- to conserve and enhance the natural beauty, wildlife and cultural heritage of the National Park;
- to promote opportunities for understanding and enjoyment of the National Park's special qualities.

If there is a conflict between the two purposes the conserving and enhancing purpose takes priority, known as the Sandford Principle. The ongoing National Parks and AONB Review may consider experience from Scotland, where the socio economic duty is elevated to a purpose. The Scottish Parks also have a fourth purpose: to promote sustainable use of the natural resources of the area. A Cotswolds National Park might aspire a bespoke model for the Cotswolds, it could:

- improve co-ordination of recreation, quiet enjoyment policy development and provision of services,
- achieve greater co-ordination and delivery of sustainable tourism for the Park area as whole,
- improve and lead a consistent approach to the management of the rights of way network, including the design and use of materials appropriate to the Cotswolds.

18. Rural diversification

Q: What would be the implications on farm diversification, reuse of farm buildings to other businesses and renewable energy projects?

A: National Park Authorities have a range of relevant and positive case studies. They also have a clear duty to foster the social and economic well-being of local communities within the National Park and regularly champion sustainable rural development.

The Park Authority would inevitably look to join up the 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; and experiment and trial new, innovative and entrepreneurial initiatives in order to aid and support appropriate rural diversification.

The Cotswolds Conservation Board is the only protected landscape organisation in England to be operating as an Accountable Body for a LEADER programme, an approach a National Park would look to develop. The Cotswolds LEADER programme is investing circa £1.7m in local growth and jobs.

Research in 2013/14 identified that the Cotswolds AONB designation generated £337m gross value added economic activity a year and that 9,720 jobs were critically dependent upon the high quality landscape and environment of the AONB. The Cotswolds AONB and any potential National Park is far more than just a nice view.

19. Environmental payments for farmers

Q: How might a National Park impact on environmental payments to farmers?

A: The future Environmental Land Management Scheme (ELMS) and proposed payments for public goods and services are still being developed by government. Dating back to the

Cotswolds Hills ESA, farmers have been strong participants in various agri-environment schemes and the current Cotswolds LEADER (economic growth and jobs creation) programme. The operation of future schemes will be dependent on there being sufficient funding available and if not, whether some landscapes are prioritised.

The current National Park family have regularly been prioritised for various programmes and pilot projects e.g the current Payment by Results agri-environment trials in the Yorkshire Dales.

The Conservation Board has proposed that the Cotswolds AONB is a pilot area for any new Environmental Land Management Scheme in view of its understanding of landscape, agriculture and communities in its protected landscape.

20. Rural economy adjacent to the National Park

Q: The Vale of Evesham is a working landscape dominated by the horticultural sector which is vital for the economy of the sub region. Are there any implications for such areas as a result of National Park status? What would be the implication of any designation in economic development terms for adjacent areas if growth is restricted because of the impact on the National Park?

A: Any National Park would be a living, working landscape - as it is now for the Cotswolds AONB - with various associated initiatives, as evidenced in the answers to questions 18 and 19 above. It should not adversely impact on the economy of neighbouring areas.

A National Park could well provide a stronger local, national and international brand for the area and the businesses that operate within the Park area or adjacent to it.

21. National Park branding

Q: How might a National Park brand help the Cotswolds?

A: National Park is a title used across the world. It is generally acknowledged that the term is better understood and appreciated than England and Wales specific designations such as AONB, even if a Park in one part of the world is significantly different from another part of the world.

It is a brand that the wider population recognises as identifying the importance of the high quality landscape and the recreation opportunities it provides. Given this greater recognition it is envisaged that the National Park brand would be of greater value and interest to a variety of public, private and charitable sector companies and organisations – even for an area as well known as the Cotswolds. Local products and produce from the National Park in particular might benefit from a Park brand.

22. Pressure on local infrastructure

Q: Whilst the Cotswolds is a popular visitor and tourist destination at present, what would increased visitor numbers look like, and what additional strain would this put on travel infrastructure – particularly the Cotswold rail line and major roads e.g. A46 and A417? Would National Park status reinforce lobbying for the doubling of the Cotswold line, would Park

status lend additional support for improvements to the A46 and A417? Is there a risk that designation might see withdrawal of infrastructure improvements on the basis of impact on the National Park?

A: Cotswold AONB is in a fortunate position of already having good rail and road infrastructure linking its protected landscape to communities and urban populations.

A National Park would seek to positively influence the delivery of appropriate infrastructure improvements. Given that the Park would be designated for the quality of its landscape, the Park Authority would seek a landscape-led approach to any infrastructure improvements, in simple terms the right improvements in the right place.

National policy e.g the National Planning and Policy Framework and associated guidance would also apply to any such infrastructure schemes.

23. Evidence base

Q: What is the evidence from elsewhere of the benefits of National Park status?

A: Consideration of the arguments for and against a Cotswolds National Park must be underpinned by evidence. The gathering of specific evidence is on going and has been included where appropriate in the answers above. Lessons are being learnt and evidence requested from Defra, Natural England, existing National Parks and other organisations with experience of National Parks.

There are 15 local authorities spread across the South West, South East and West Midlands regions with territory in the Cotswolds AONB. This does make aspects of consistent evidence gathering, data collection and interrogation for the whole area more challenging.

24. Why not simply retain the Cotswolds AONB

Q: Why designate a Cotswolds National Park to replace a Cotswolds AONB?

A: Whilst the AONB has the same landscape status as a National Park it is a poor cousin from a policy, practical delivery and resourcing perspective. As evidenced through the questions and answers above, the National Park offers a better designation and management arrangement for the consistent delivery of policies and decision making across the whole landscape. It is the best available option for securing the long term future of the Cotswolds landscape, environment and everyone living and working in this very special area.