

Committee: High Weald AONB Joint Advisory Committee

Date: 1 November 2010

Title of Report: National Consultations: *Guidance for Assessing landscapes for designation as National Parks or AONBs in England*

By: AONB Director

Purpose: To consider the response by the AONB Director

RECOMMENDATIONS

The Joint Advisory Committee is recommended to note the report.

Supporting information

1. BACKGROUND

1.1 In August 2010 Natural England wrote to all English Local Authorities, Parish Councils, National Park Authorities and AONB partnerships to seek their comments on draft guidance that sets out how Natural England will assess whether land is suitable for AONB or National Park designation. It deals with assessing landscapes against statutory designation criteria; identifying detailed boundaries and implementing designation or boundary variation orders. The deadline for responses was 8th October 2010.

1.2 The guidance brings together all relevant legislation on protected landscapes and for the first time it also contains a suggested method for applying legislation to the practical assessment of landscapes in designation decision making. This document is significant for the High Weald AONB not because we anticipate further boundary change but because any method for the practical assessment of landscapes in designation decision making will inevitably be used and subject to challenge in planning decisions.

1.3 The guidance was discussed by the Officers' Steering Group on 8th September 2010 and the AONB Director offered to prepare a response. A copy of our response is attached.

2. AONB COMMENTS

2.1 Whilst welcoming the intention of the guidance we are particularly concerned that a new method for evaluating the 'sufficiency' of natural beauty has been slipped into this document without proper prior consultation with bodies such as ourselves who apply these principles on a daily basis.

2.2 The evaluation framework proposed in the guidance is confused about the fundamental role people and human processes play in the 'natural' beauty of cultural landscapes like the High Weald and is not consistent with the approach to natural beauty laid out in the statutory AONB Management Plan. For this reason we have made strong

representations to Natural England setting out our concerns and promoting an alternative approach.

2.3 Our comments and concerns have been supported and taken up by the National Association for AONBs and English Heritage who have also submitted responses. We have not yet received a reply from Natural England.

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Advising on the management of a nationally valued landscape

Rob Cooke
Director: Environmental Advice and Analysis
Natural England

21st September 2010

Dear Rob Cooke

Comments on **Guidance for Assessing landscapes for designation as National Parks or AONBs in England**

Thank you for the opportunity to comment on this document. We welcome a document which brings together the relevant legislation and its application and we have no concerns about sections 1-3 or sections 5-7. Our main concern involves the technical criteria for evaluating natural beauty in Section 4 and Appendix 1.

It would be helpful to know the origins of this evaluation framework for natural beauty and what consultation it has been subject to previously. In our view the evaluation framework is confused, inconsistent and contradictory. Applying it to the High Weald AONB using available data as evidence it could equally well support total de-designation as it could expansion of the AONB boundary to include the whole of the Low Weald NCA. As it stands, therefore, we are not confident that this evaluation framework would be an effective tool to resolve even the simplest of boundary reviews. Our comments are as follows:

General comments:

1. The lack of clear thinking about the role of people and human processes in protected landscapes is evident throughout this evaluation framework. For example:

- How can any AONB be said to have 'A relative lack of human influence' when virtually all protected landscapes in England owe their 'natural' beauty to a long history of traditional interactions between people and nature?
- How can NB12: 'Extensive areas of semi-natural vegetation' be an indicator for Sub-factor: 'A relative lack of human influence' when semi-natural vegetation by definition has been extensively modified by man?
- How can landscape elements be in a good condition (NB2) without active human intervention, the absence of which is suggested as a positive indicator

by NB15? For small scale pastoral landscapes like the High Weald this means functioning farmsteads and busy, noisy, sometimes visually intrusive management of woodlands and grassland proposed as detractors to a presumed beneficial tranquillity by NB17.

2. Underpinning this framework is the assumption, in our view a mistaken assumption, that there is a common value system for scoring perceptual and experiential landscape qualities. This is further confused by an over emphasis on remoteness and tranquillity; a factual misunderstanding about the role communication networks and settlement plays in character and the attempt to provide objective indicators for subjective qualities. For example:

- Why is a sense of openness and exposure a sub-factor and indicator (NB14) for wildness when the most likely characteristic of wild landscapes certainly in southern England would have been a wooded more enclosed feel (albeit with open grazed areas)? It may be that people value a sense of openness and exposure but this should not be confused with wildness.
- Relative wildness and tranquillity factors both have indicators relating to the absence of roads and built features (NB10, NB11, NB13, NB17) which is likely to give these features (or the absence of them) a disproportionate influence over the final score.
- Similarly 'Scenic quality' contains 3 indicators favouring views (NB5, NB6 and NB9). People might seek striking landform (NB6); memorable views (NB9); open, expansive, uninterrupted tracts of land (NB13 and 14) in the places they visit whilst at the same time valuing different qualities in the landscape they experience day to day. Certainly in the High Weald research shows that people appreciate and cherish the feeling of shelter, intimacy and sense of surprise around every corner which this wooded more enclosed landscape provides.
- The processes of human occupation and settlement play a fundamental role in landscape character so it would not be surprising to find that in some landscapes, such as the High Weald, surviving patterns of communication networks or settlements are as important to 'natural' beauty as semi-natural vegetation. How does this fit with an evaluation framework that rates absence of roads (NB10) and distance from habitation (NB11) as key indicators of natural beauty?

Comments on detail:

1. Factor: landscape quality - Natural England promotes the European Landscape Convention (ELC) definition of landscape: 'an area, as perceived by people, whose character is the result of the action and interaction of natural and human factors'. Under this definition 'Landscape quality' should, logically, encompass all the other factors.

2. NB2 - Landscape condition is notoriously difficult to define. In this document does it relate to:-

- The ecological functioning of landscape elements?
- The long term security of appropriate management for those elements?
- The coherence/ intactness of the patterns or character of that landscape element?

For example, in the High Weald AONB woodland in the form of interconnected small woodlands, wooded gills and shaws is a core component of character. The extent and pattern of this woodland is maintained but very little is actively managed and whilst it is functioning well as a carbon store and habitat for shade tolerant and woodland edge species it is not for species adapted to traditional cyclical management.

3. NB3 - We welcome the understanding that incongruous features that are temporary in nature such as wind turbines do not necessarily have a negative impact on natural beauty.

4. Factor: Relative wildness - In our view this is not an appropriate evaluation factor for what are essentially cultural landscapes see general comment 1 above. This factor could be seen to suggest that traditional management which can be noisy and visually intrusive and the built environment necessary to support it are not compatible with the designation.

5. NB10 and NB11 - There are over 3500 farmsteads in the High Weald AONB, over 100 villages and many more hamlets and individual buildings. The High Weald is also characterised by a dense network of radiating droveways (roads and rights of way). It may feel remote but this is only because the lack of woodland management screens views which for many hundreds of years would have regularly revealed the many farmsteads, hamlets and routeways. This may change again with the rapid expansion of wood fuel.

6. NB13 - At the height of the Wealden iron industry the High Weald was a heavily industrialised landscape and the remains of this industry are everywhere.

7. NB15 - The absence of human intervention seen as a positive in this indicator is a direct threat to the conservation of natural beauty.

8. Factors: Cultural heritage and associations - Cultural aspects are about more than just historic features or art. We would expect these factors to include consideration of relevant socio-economic factors. For example, the existence and economic health of appropriate traditional (and new) industries and craft skills that could provide the necessary resilient, low carbon land management into the future.

An alternative approach

In our view an alternative approach to evaluating natural beauty is required. This needs to be flexible enough to accommodate existing protected areas, the 'sufficiency' of whose natural beauty was not judged against set criteria, and the more rigorous approach required for new designations. We suggest a new evaluation framework consisting of four parts:

1. Assessment of the degree of intactness/ coherence and time depth of those components of natural beauty (character) that make the area homogenous, recognisable and distinct from surrounding areas i.e. those components which

unite an areas character at a given scale not those elements or features which subdivide the area into smaller landscape units.

2. Assessment of the contribution made by other nationally important and locally distinctive features such as rare habitats or BAP species; historic sites or vernacular buildings.
3. Assessment of the factors that contribute to visual enjoyment and/or provide experiential/ perceptual qualities.
4. Assessment of the functioning of the ecological and cultural systems underpinning natural beauty.

We are happy to discuss further any of these views.

Yours sincerely

Sally Marsh
AONB Director

Notes:

1. The views expressed are the views of the AONB Director and not the agreed position of the High Weald Joint Advisory Committee (JAC) who are not able to provide comment within the timescale.