

Ruth Bradshaw, Policy and Research Manager, Campaign for National Parks – Written Evidence (LUE0048)

Introduction

1. The Campaign for National Parks is the independent national voice for the 13 National Parks in England and Wales. Our mission is to inspire everyone to enjoy and look after National Parks – the nation’s green treasures. We have been campaigning for over 80 years to ensure that our National Parks are beautiful, inspirational places that are relevant, valued and protected for all.
2. Our evidence focuses particularly on the issue of land use in National Parks, of which there are 10 in England, covering almost 10% of the country. These areas support the protection of the landscape and wildlife and deliver key environmental services, such as water provision and carbon storage in peat soils and forests. As well as being inspiring places for people to enjoy and improve their health and well-being, National Parks are also home to rural communities and make a significant contribution to the economy through tourism, farming, and other related businesses which often rely on the high-quality environment for their success.
3. Many of the benefits which National Parks provide, including tourism and rural economic growth, could be lost if the special qualities for which they are valued are undermined. National Parks are living and working landscapes, but the challenge is to ensure that the range of benefits that they provide is not compromised by insensitive change, unsympathetic land use or irresponsible development. It is therefore essential that the planning system and other policies governing land use provide strong support for the protection and enhancement of designated landscapes.
4. We have focused on National Parks as that is what our charitable purposes relate to but most of the issues covered are equally applicable to Areas of Outstanding Natural Beauty (AONBs).

Responses to the Committee’s questions

Pressures and challenges

Q1. What do you see as the most notable current challenges in relation to land use in England? How might these challenges best be tackled? How do you foresee land use in England changing over the long term? How should competing priorities for land use be managed?

5. The most notable current challenges in relation to land use in England nearly all relate to the climate and ecological emergency. A range of factors contribute to this including poor agricultural and land management practices and unsustainable and poorly located housing and other types of development resulting in increased pressure for new transport infrastructure. Furthermore, some of the measures to address this emergency also present challenges in relation to land use such as the availability of land for renewable energy infrastructure, and the increased demand for agricultural land by companies looking to implement carbon offsetting projects. The demand for such uses is likely to increase over the long term and these challenges would best be tackled by developing a strategic approach to identifying where different types of land use are most appropriate and ensuring that there are rigorous and well-enforced policies in place to reduce the negative impact of damaging land use practices. Such an approach would also ensure that competing priorities for land use were managed most effectively.

Farming and land management

Q4. What impacts are changes to farming and agricultural practices, including food production, likely to have on land use in England? What is the role of new technology and changing standards of land management?

6. The farmed area and the type of farming varies between the Parks, but most of the land in England's National Parks is used for farming, the majority of which is livestock based. Centuries of farming have shaped the landscapes of the National Parks and helped create many of their special qualities but in recent decades intensive farming practices have had many negative environmental impacts including biodiversity loss, reduced flood resilience, poor water quality and degraded soils. It's clear that changes to agriculture and land management are needed in order to tackle the climate and nature emergency and that this will have an impact on land use.
7. The 2019 IPCC report on Climate Change and Land¹ highlighted the need for policies to influence dietary choices and enable more sustainable land-use management. The National Farmers' Union (NFU) has already committed its sector to a target of net zero GHG emissions by 2040 and the final report of the RSA's Food, Farming and Countryside Commission² argued that the need for radical changes to make farming more sustainable is as crucial as decarbonising our energy system. Many of these changes have significant implications for

¹ <https://www.ipcc.ch/site/assets/uploads/2019/08/3.-Summary-of-Headline-Statements.pdf>

² https://www.thersa.org/globalassets/projects/psc/ffcc/reports-2/1.-our-future-in-the-land_executive-summary_july19.pdf

farming and agricultural practices in National Parks, for example, a move to a more plant-based diet would lead to changes in the type of farming practiced with consequent impacts on the landscape. Some farmers are already adopting a more sustainable approach to food production³.

Q5. What impact are the forthcoming environmental land management schemes likely to have on agriculture, biodiversity and wellbeing? What do you see as their merits and disadvantages?

8. Environmental Land Management (ELM) is critical to bringing about the transformation for agriculture, biodiversity and wellbeing that's needed. It is essential that ELM is designed specifically to further the purposes of National Parks, recognising the special qualities and special challenges in these places, over and above the wider countryside. We want the Government to set out a clear vision for agriculture and land management in Protected Landscapes which emphasises the importance of less intensive, regenerative and nature-based agriculture and land management. Given that National Parks are so important for recreation, there should also be specific emphasis on how farmers and landowners can be encouraged, supported and rewarded for managing better and greater access, with less impact.
9. We would like to see a full evaluation of this the Farming in Protected Landscapes (FiPL) programme with the successful elements replicated in the design and delivery of future ELM schemes in Protected Landscapes. National Parks have been designated by virtue of their outstanding special qualities for nature, natural beauty, public access and enjoyment and cultural heritage. This should be reflected in ELM, with schemes designed in a way which furthers the statutory purposes of these areas. This could be achieved either through the weighting and targeting mechanisms in ELM, or through a continuation of an additional scheme such as FiPL as part of the ELM framework. We urge Government to give special attention to public access aspects, as land managers need to be supported to welcome visitors as well as manage their impacts. Options related to this have been largely removed from recent agri-environment schemes, and land agents and advisors currently have very little experience in this area: time and investment is needed to build capacity and capability and its crucial to get this right to avoid escalation of insider-outsider polarisation experienced during the pandemic.
10. We also encourage government to expediate the phasing out of damaging and intensive land management. This should include a ban

³ <https://www.nffn.org.uk/about-us/>

on all burning on peatland in National Parks and AONBs, irrespective of peat depth.

Nature, landscape and biodiversity

Q6. What do you see as the key threats to nature and biodiversity in England in the short and longer term, and what role should land use policy have in tackling these?

11. The key threats to nature and biodiversity are the changing climate which has been identified as one of the biggest causes of biodiversity loss globally⁴; unsustainable land management practices as discussed in response to Q4, the pressure for development as discussed in response to Q7; and pollution. The impact of pollution on water quality is of particular concern⁵.

Q7. What are the merits and challenges of emerging policies such as nature-based solutions (including eco-system and carbon markets), local nature recovery strategies and the biodiversity net gain requirement? Are these policies compatible, and how can we ensure they support one another, and that they deliver effective benefits for nature?

12. The need to adapt to, and mitigate for, climate change offers significant opportunities to demonstrate the potential to deliver nature-based solutions in areas such as flood prevention and carbon storage in National Parks. NPAs are already involved in delivering a range of these types of projects. For example, Dartmoor and Exmoor NPAs are part of the South-West Peatland Partnership which is working to restore over 3000 hectares of peatland in total and which will achieve a carbon abatement of 1,013 tCO₂ per year once completed⁶. There are details of a number of other existing land management initiatives in National Parks on the National Parks UK (NPUK) website⁷.
13. One of the key challenges is identifying what kind of habitat improvement might be appropriate in particular locations. For example, tree-planting may not always be the most appropriate solution and NPAs are using Landscape Character Assessments, woodland strategies and other initiatives to identify where they should prioritise support for particular types of habitat. Local Nature Recovery Strategies (LNRSs) should play a strong co-ordinating role in helping to identify the most appropriate improvements for particular locations and in ensuring that nature-based solutions and other relevant policies such as biodiversity net gain complement each other. To be effective,

⁴ <https://nbn.org.uk/wp-content/uploads/2019/09/State-of-Nature-2019-UK-full-report.pdf>

⁵ For further detail, see: https://www.wcl.org.uk/docs/WCL_Blueprint_for_Water_Vision_Report.pdf

⁶ <https://www.southwestwater.co.uk/environment/working-in-the-environment/south-west-peatland-partnership>

⁷ <https://www.nationalparks.uk/climate-change/>

the LNRs will need to be developed and implemented in partnership with farmers, landowners and other key stakeholders so there are significant opportunities to build on the approach that NPAs already use for developing their Management Plans. NPAs have a long history of working in collaboration with a range of relevant partners to agree priorities and actions for nature's recovery as part of these Plans.

14. Another major challenge involved in delivering more nature-based solutions is the availability of sufficient funding. In particular, there is a need for revenue support for staff costs as well as project funding particularly in terms of the preparatory work needed for major land management projects which involve getting agreement from a wide range of landowners and other stakeholders. The NPAs across the UK are working together on a programme called "net zero with nature"⁸ as part of the Revere initiative co-ordinated by NPUK working in partnership with Palladium. £239m of nature restoration projects have been identified for funding through Revere. This includes the Great North Bog which is a peatland restoration project covering nearly 7000 square kilometres of upland peat across the designated landscapes of Northern England including four National Parks. It is being developed by the Yorkshire Peat Partnership, Moors for the Future Partnership and the North Pennines AONB Partnership⁹ and aims to join up some of the existing restoration projects that these partnerships have already successfully delivered. The partners estimate that 4.4 million tonnes of carbon is released annually by damaged peat in the Great North Bog area. Restoring this peatland will deliver many other benefits, including enhanced biodiversity, improved water quality and reduced flood risk.
15. While there are many important reasons for supporting nature-based solutions, care must be taken to avoid an over-reliance on their use for carbon offsets. Carbon offsetting through land management has specific risks including undermining demand management (if carbon savings are used as a justification for not reducing direct emissions). There are also significant levels of uncertainty about exactly how much carbon different types of habitats store and for how long. For example, natural processes such as wildfires, could result in the release of carbon stored in woodlands or peatlands and peatlands need to be in good condition in order to be able to store carbon in the first place. Off-sets must be independently verifiable, and robustly monitored to avoid double-counting. As well as being permanent they must also result in a real net reduction in emissions, taking account of any additional emissions resulting from their establishment, ongoing management and monitoring. This is important as some of the processes required to implement nature-based solutions can be fairly carbon intensive, for example, helicopters are often used to transport

⁸ <https://www.nationalparks.uk/net-zero-with-nature/>

⁹ <https://greatnorthbog.org.uk/>

materials to peatland restorations sites which are inaccessible by other means.

Environment, climate change, energy and infrastructure

Q8. How will commitments such as the 25-year environment plan and the net zero target require changes to land use in England, and what other impacts might these changes have?

16. Preparing for climate change and achieving the net zero target are going to require a wide range of different actions. Even if strong action is taken now, global temperatures will continue to rise so policies to tackle climate change need to incorporate measures to adapt to the impacts of climate change such as flooding as well as measures to reduce carbon emissions, such as greater use of renewable sources. Both these types of measures have significant implications for land use in National Parks. There is evidence from both Wales¹⁰ and Scotland¹¹ that climate mitigation and adaptation measures are likely to have as much impact on land use as the direct impacts of climate change. The need to reduce carbon emissions in the energy sector also has implications for National Parks as these areas are rich in many of the resources used to generate renewable energy.

Land use planning

Q10. What do you see as the advantages and disadvantages of the existing land use planning system and associated frameworks in England? How effectively does the system manage competing demands on land, including the Government's housing and development objectives? What would be the merits of introducing a formal spatial planning framework or frameworks, and how might it be implemented?

17. One advantage of the existing land use planning system in England is that designated landscapes are granted additional protection in the National Planning Policy Framework, including the presumption against major development in these areas. A successful part of the current system is that NPAs are local planning authorities, with responsibility for both plan-making and planning decisions in their area. Having dedicated planning authorities for National Parks is critically important to the protection and enhancement of the Parks and the well-being of the communities that live within them.

18. Another essential element of the existing system is that those responsible for National Parks are able to take account of both the local and national needs and ambitions for these areas. In order to for this to be done effectively, NPAs must have the right balance of locally and

¹⁰ <https://eprints.glos.ac.uk/6722/>

¹¹ <https://www.nature.scot/climate-change/climate-change-impacts-scotland/climate-change-impacts-landscapes>

nationally appointed members and we would not want to see any reduction in the proportion of nationally appointed members with responsibility for planning decisions in National Parks. Not only are such members appointed to represent the national interest but they also bring specialist skills in areas such as landscape, biodiversity and heritage, which are particularly important to the work of the NPAs.

19. The current approach to housing delivery in National Parks, as set out in Local Plans, aims to ensure that the limited development opportunities available cater for local needs rather than meet the high demand for market housing. However, there is still a lack of affordable and/or local occupancy housing in some National Parks. Even when NPAs have appropriate policies in place, they cannot always rely on developers bringing forward sufficient sites or implementing planning permissions once granted. There is a need to consider what more Government could do to support the delivery of housing which supports the needs of local people in National Parks. The high-quality environment in these areas makes them attractive places to live. 2011 Census data (the latest available), suggests all the National Parks have an increasingly ageing population, indicating that they are seen as particularly attractive places to relocate to for those who are retired. This combined with the fact that these are popular areas for second homes, means that average house prices in National Parks are already significantly higher than the average house price in their respective region, increasing the pressure for development in these areas. Previous research has found that the premium for a property in a National Park varied from 27% to 90% but in five of the 10 National Parks it was over 60%¹².

20. There are limited options for the NPAs to address the issue of second homes without changes at a national level. We want the Government to introduce measures to allow for additional council tax to be paid on second homes and by businesses that operate multiple holiday lets. We would also like to see the introduction of measures to allow local planning authorities to require planning consent for a change of use from a permanent residence to a second home or holiday let in areas where high numbers of such properties are having a detrimental impact on local communities. This should be along similar lines to the proposals which the Welsh Government has recently consulted¹³ on and which involve changes to secondary legislation to create new use classes for second homes and holiday lets and to primary legislation to ensure that this change of use is a material consideration in planning decisions. Changes to the planning system would need to be accompanied by a number of other changes

¹² [Valuing England's National Parks, Cumulus Consultants Ltd and ICF GHK report for National Parks England 2013](#)

¹³ [Planning legislation and policy for second homes and short-term holiday lets | GOV.WALES](#)

including a compulsory licensing scheme for holiday homes and more resources for local planning authorities to enable them to deal with the increased number of planning applications and associated enforcement activities. There is further information in our response to the Welsh Government consultation¹⁴.

21. There is increasing pressure for land use for a wide range of different purposes both within existing protected landscapes and across the whole of England. Introducing a formal planning framework would allow for much more careful consideration to be given to the most appropriate land use in particular locations, including identifying how particular areas will need to change in order to tackle the climate, ecological and public health challenges we currently face. This should include identifying further areas for designation as Protected Landscapes.
22. Much has changed since the first National Parks were created in England and Wales in the aftermath of World War Two, but the pandemic has demonstrated how important and invaluable these landscapes continue to be. There is now a need for an improved network of designated landscapes, including new National Parks to support a healthy and inclusive society. This could also extend the boundaries of coastal National Parks to include their adjacent marine features and seascapes and even potentially include completely new types of designation.
23. In terms of identifying a wider network of designations, particular attention should be given to restoring landscapes which could lead to the creation of future National Parks in areas where there are significant gaps in the existing network of designated landscapes in terms of both public accessibility and ecological connectivity, and where there are particularly rare or threatened habitats. These areas should be clearly identified as part of a wider Land Use Strategy and/or National Spatial Plan and afforded additional protection in recognition of their potential future status.

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¹⁴ [220222 \(FINAL\) CNP AWDL response to WG consultation on planning changes for second homes and holiday lets.pdf](#)