

## Planning

HEAD OF SERVICE: ADRIAN DUFFIELD



Listening Learning Leading



By email:

[landscapesconsultation@defra.gov.uk](mailto:landscapesconsultation@defra.gov.uk)

Contact officer:

Tel: 01235 422600

Textphone users add 18001 before you dial

4 April 2022

Dear Sir/Madam,

### **Government Response to the Landscapes Review**

Thank you for providing South Oxfordshire and Vale of White Horse District Councils with the opportunity to comment on the Government Response to the Landscapes Review.

Significant areas of South Oxfordshire and Vale of White Horse are located within the Chilterns and North Wessex Downs Areas of Outstanding Natural Beauty (AONBs).

The Councils' response is provided below and is formatted to align with the relevant consultation questions.

#### **A stronger mission for nature recovery (p10)**

##### **6. Should a strengthened first purpose of protected landscapes follow the proposals set out in Chapter 2? (Response options: YES/NO/UNSURE.)**

Yes - A core function of protected landscapes should be to drive nature recovery. A revised purpose should be more specific with regards to nature outcomes and explicitly mention biodiversity. The principle of natural capital should also be included to capture the societal value of nature in our protected landscapes and encompass a broader range of ecosystem services.

##### **7. Which other priorities should be reflected in a strengthened first purpose e.g. climate, cultural heritage? (Open response.)**

A strengthened first purpose of protected landscapes should take account of the need to address the climate emergency and to ensure long term resilience to climate change.

## **Agricultural transition (p12)**

**8. Do you support any of the following options as we develop the role of protected landscapes in the new environmental land management schemes?**  
(Select all that apply.)

Support the following options:

- Designing the environmental land management schemes in a way that works for all farmers and land managers, including the specific circumstances for those in protected landscapes, recognising that farmers in these areas are well-placed to deliver on our environmental priorities.
- Using Local Nature Recovery Strategies to identify projects or habitats within protected landscapes.
- Monitoring the effectiveness and uptake of the new environmental land management schemes in protected landscapes. Using this to inform whether further interventions are needed to ensure we are on track for wider nature recovery ambitions.
- Creating a clear role for protected landscape organisations in the preparation of Local Nature Recovery Strategies.
- Building on the Farming in Protected Landscapes (FiPL) programme, empowering protected landscapes to support decision-making and delivery against agreed priorities, including through dedicated project coordinators and advisers.

**9. Do you have any views or supporting evidence you would like to input as we develop the role of protected landscapes in the new environmental land management schemes?** (Open response.)

Protected landscapes include some of our most important habitats. There is significant potential to support local nature recovery in these areas, including increasing ecological connectivity. This should be recognised in new environmental land management schemes.

Opportunities should also be taken to deliver wider environmental gains and to increase natural capital.

Landscape recovery within protected landscapes and their settings could help to conserve and enhance the natural beauty of protected landscapes and to deliver wider benefits for people and nature.

## **A stronger mission for connecting people and places (p14)**

**10. Should AONBs have a second purpose relating to connecting people and places, equivalent to that of National Parks?**  
(Response options: YES/NO/UNSURE.)

Yes.

**11. Should a strengthened second purpose of protected landscapes follow the proposals set out in Chapter 3 to improve connections to all parts of society with our protected landscapes? (Response options: YES/NO/UNSURE.)**

Yes - It is important to ensure that all communities have opportunities to experience and benefit from protected landscapes and that current inequalities are addressed. However, improving connections between people and protected landscapes should be undertaken in a way that avoids harm to the special character of these areas. It is also important that connections are sustainable, utilising active and low carbon modes of travel.

**12. Are there any other priorities that should be reflected in a strengthened second purpose? (Open response.)**

Yes:

- Addressing inequalities.
- Enhancing sense of place, local character and identity.
- Protecting, enhancing and increasing awareness of cultural heritage.

### **Managing visitor pressures (p16)**

**13. Do you support any of the following options to grant National Park Authorities and the Broads Authority greater enforcement powers to manage visitor pressures? (Select all that apply.)**

No response.

**14. Should we give National Park Authorities and the Broads Authority and local highway authorities additional powers to restrict recreational motor vehicle use on unsealed routes? (Response options: YES/NO/UNSURE.)**

Yes.

**15. For which reasons should National Park Authorities, the Broads Authority and local authorities exercise this power? (Tick all that apply.)**

Support the following options:

- Environmental protection
- Prevention of damage
- Nuisance
- Amenity

**16. Should we legislate to restrict the use of motor vehicles on unsealed unclassified roads for recreational use, subject to appropriate exemptions? (Select one answer.)**

Yes – everywhere

**17. What exemptions do you think would be required to protect the rights and enjoyment of other users e.g., residents, businesses etc? (Open response.)**

There are a number of residential properties that are accessed via unsealed unclassified roads in South Oxfordshire and Vale of White Horse. It is essential that access for residents is retained.

It is also important to ensure that the rural economy is supported by allowing business access, including access for farmers.

Appropriate mechanisms for enforcing the restriction of recreational use of unsealed unclassified roads should be considered.

**The role of AONB teams in planning (p18)**

**18. What roles should AONBs teams play in the plan-making process to achieve better outcomes? (Open response.)**

It is important that AONB teams shape the Local Plans and Neighbourhood Plans affecting their AONB. This will ensure that development plans contain the right policies that give great weight to conserving and enhancing the landscape and scenic beauty of AONBs which, alongside National parks and the Broads, have the highest status of protection in relation to these issues.

There should be increased resources to enable the production of evidence at a landscape-scale for AONBs. (For example: assessments of setting, views, tranquillity, dark skies, biodiversity, etc.) This would provide consistent, cross-boundary evidence to inform the production of local plans and could help to avoid a piecemeal approach. Any spatial information associated with these assessments should be made available to local planning authorities as GIS layers to ensure that it is accessible for plan-making.

Local planning authorities could have a duty to engage with AONB teams as statutory consultees, similar to that which exists for Local Nature Partnerships and Local Enterprise Partnerships. This could help to ensure that cross-boundary strategic planning matters related to AONBs are fully identified and considered through the plan-making process.

There should be increased resources to enable AONB teams to provide guidance on neighbourhood planning in AONBs and the setting of AONBs.

The opportunity to create cross-boundary development plan documents specially for AONBs already exists in planning legislation, and we are aware of one example so far - the Arnside and Silverdale AONB Development Plan Document (weblink: [www.southlakeland.gov.uk/aonb-dpd](http://www.southlakeland.gov.uk/aonb-dpd)). More resources and policy encouragement for joint development plans for AONBs could benefit their long term planning and enhancement. Where these are joint plans, covering all the AONB over several local planning authority areas, this would be a good example of fulfilling the Duty to Co-operate (Section 33A of the Planning and Compulsory Purchase Act 2004).

**19. Should AONB teams be made statutory consultees for development management?** (Response options: YES/NO/UNSURE.)

YES - AONB teams should be provided with sufficient resources to undertake this role and are likely to need to employ planning professionals.

**20. If yes, what type of planning applications should AONB teams be consulted on?** (Select one answer.)

AONB teams should formally agree with local planning authorities which planning applications should be consulted on.

This would allow a proportionate approach that takes account of local circumstances.

**Local governance (p20)**

**21. Which of the following measures would you support to improve local governance?** (Select all that apply.)

- Improved training and materials
- Streamlined process for removing underperforming members
- Greater use of advisory panels
- Greater flexibility over the proportion of national, parish and local appointments
- Merit-based criteria for local authority appointments
- Reduced board size
- Secretary of State appointed chair

We have concerns about the proposal to reduce board sizes and would not consider a fixed 'one size fits all' cap of 12 members for AONB boards to be appropriate. We would suggest that greater flexibility is needed where AONBs cover a large number of local authority areas to ensure that all local authorities are part of decision-making processes. We would also not want to see the representation of parish councils restricted by size limits. The inclusion of local authorities and parish councils in AONB boards is essential in ensuring that local communities and local issues are properly represented and to ensure that decision-making processes are democratically accountable.

**A clearer role for public bodies (p22)**

**22. Should statutory duties be strengthened so that they are given greater weight when exercising public functions?**

(Response options: YES/NO/UNSURE.)

Yes.

**23. Should statutory duties be made clearer with regards to the role of public bodies in preparing and implementing management plans?**

(Response options: YES/NO/UNSURE.)

Yes.

**General power of competence (p24)**

**24. Should National Parks Authorities and the Broads Authority have a general power of competence? (Response options: YES/NO/UNSURE.)**

No response.

**Overall**

**25. If you have any further comments on any of the proposals in this document, please include them here. (Open response.)**

No response.

Yours Sincerely,

**██████████ MRTPI**  
Senior Planning Policy Officer  
South Oxfordshire and Vale of White Horse District Councils