

Government response to Glover Review

Final John Muir Trust response to consultation

[Consultation paper](#)

Questions

1. Do you want your responses to be confidential? No
2. What is your name? Rosie Simpson
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4. Where are you located? Other (no option for remote)
5. Which of the following do you identify yourself as? Environmental NGO

A stronger mission for nature recovery (p10)

6. Should a strengthened first purpose of protected landscapes follow the proposals set out in Chapter 2? YES

Please give reasons for your answer

We have three main reasons for this answer:

1. Protected landscapes contain some of England's wildest remaining areas. As such, they are areas that have great potential for connecting existing wild places with restored wild places and restoring damaged or fragmented habitats using knowledge about the habitats and species that are still present within the landscapes. The Government's response to the Glover Review recognises this recovery potential: 'Despite being less than one-quarter of land cover, protected landscapes are home to nearly half of all priority habitats in England, including 60% of deep peat, 34% of broadleaf woodland and nearly 88% of heather and acid grassland habitats.'
2. As landscapes with agreed boundaries and established partner bodies, they are ideally suited to planning for nature's recovery at landscape scale. As such they have a pivotal role in the UK Government meeting its 2030 species abundance target and any other biodiversity targets brought forward under the Environment Act 2021.
3. Protected landscapes have a unique leadership opportunity in demonstrating what 'bigger, better and more joined up' (as per the Lawton Review, published 2010, which remains an important contribution to the land management changes needed in 2022) looks like in England. They are areas that have people and land managers with the expertise needed to deliver on this.

We believe that achieving the stated strengthened first purpose requires England's protected landscapes to be wilder. The need for protected landscapes to become wilder places was envisaged in the Glover Review, with the recommendation that 'Strengthened Management Plans should set clear priorities and actions for nature recovery including, but not limited to, wilder areas and the response to climate change (notably tree planting and peatland restoration).' We would like to see this recommendation incorporated into the strengthened first purpose, with implementation plans required to fulfil this purpose. Rewilding Britain, in their response to this consultation, suggests two ways that wilder protected landscapes can be achieved: the introduction of core rewilding areas

across at least 10% of their area by 2030 and regenerative areas across at least 50% of their area by 2030.

The Glover Review noted that wilder areas do not need to be a stark choice between different land uses; they can be part of a continuum, realised by different approaches to land management within a protected landscape. For example, some species and habitats will return when the land is grazed less or grazed by different types of livestock (for example, grazing by cattle rather than sheep). Wilder landscapes will mean improved biodiversity, greater natural resilience to a changing climate, and enhanced experiences for people visiting these places (wilder landscapes are more alive with more sounds, smells, colours – the Glover review quoted from the ‘Wild by Design’ report, noting that a wilderness experiences can be meaningful in a range of scenarios of different scales - ‘The elements that make an area evoke this experience are diverse but principally include a sense of closeness to nature, freedom, solitude and even a sense of danger and challenge.’) By becoming demonstrably wilder, protected landscapes will become more vibrant places to live, work and visit. They will also set a standard for what is possible and have a greater chance of counting towards the Government’s target for 30% of land for nature by 2030.

Please also see our answer in response to Question 25.

7. Which other priorities should be reflected in a strengthened first purpose e.g. climate, cultural heritage?

Considering the extent to which nature has declined and has been widely reported as having declined in England as well as the rest of the UK, it seems reasonable to keep the strengthened first purpose simple and focused on recovering nature within protected landscapes. Prioritising nature recovery will deliver climate benefits and a boost for biodiversity whilst retaining a clear focus. A first purpose that is clearly about nature recovery addresses the priority to respond to climate change as we know that increasing the amount of land where nature is recovering increases the ability of that land to store carbon in the future (see Natural England’s report published April 2021, ‘Carbon Storage and Sequestration by Habitat 2021’).

By way of example, England’s uplands, which overlap with protected landscapes, are in a degraded condition and not delivering for biodiversity. Reversing the degradation requires prioritisation starting with a clearly focused first purpose on nature recovery in protected landscapes with commensurate targets and monitoring of outcomes. This matters for achieving the 30% of England protected for nature by 2030 target, for climate resilience, and for enhancing the quality of the public goods that we all rely on and which the uplands provide (for example, naturally filtered clean drinking water, space for nature recovery and improved biodiversity, natural carbon sinks and more resilient upper river catchments).

A clear nature recovery primary purpose for protected landscapes would set the policy context for the outcomes under the Environmental Land Management Schemes, including the Farming in Protected Landscapes Scheme, and guide decisions and funding towards achieving the primary purpose. A practical example for the application of how nature recovery as the primary purpose can direct policy and funding: sheep numbers in England’s uplands should be set at numbers that are not detrimental to biodiversity and species recovery. The Sustainable Farming Incentive and other funding yet to be made available through the Environmental Land Management Scheme will need to support land managers and farmers with lower intensity agriculture that enables the delivery of nature recovery in protected landscapes.

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? [TICK ALL](#)

- 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. Our recent LNRS consultation specifically asks for views on the role of different organisations in the preparation of LNRSs, including protected landscapes.
- Building on FiPL, 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?

On reflecting the special status of protected landscapes into the design of the Environmental Land Management Schemes associated payments for farming and land management in protected landscapes (under the future ELM schemes - the Sustainable Farming Incentive, Local Nature Recovery scheme and Landscape Recovery scheme) should:

- 1) proceed on agreed priorities and outcomes for nature recovery; and
- 2) request evidence of nature recovery as a condition of additional future payments being released.

Suggested outcomes for climate and nature under these schemes:

Climate outcomes

- more carbon being naturally stored, sequestered or both (the Glover Report noted some National Parks had led successful peatland restoration programmes but that others had been slow to realise the land's natural carbon storing benefits, this could change with clear outcomes tied to available funding within protected landscapes)
- reduced flood risk
- a better understanding among farmers, land managers and the public as to what different habitats and land uses can deliver for carbon storage and reduced carbon emissions
- a landscape that's more resilient to climate change

Nature outcomes

- a greater area of wildlife-rich habitat

- greater connectivity between habitats
- better management of existing habitats for biodiversity
- increased biodiversity (this should follow from creating habitat and greater habitat connectivity)

To achieve the nature and climate outcomes requires reducing or eliminating the land use pressures and management types that undermine these outcomes, such as intensive farming. Asking what we type of activity should stop, start or change.

To indicate progress towards these outcomes will require baseline data. This baseline data would contribute to Local Nature Recovery Strategies and there will need to be a body with lead responsibility for gathering the data and recording it and evaluating it over time. The data would be critical in understanding whether the protected landscapes were delivering their primary purpose. As such, there could be a justified role for the 'lead partners' (defined in the Government's response at page 4) to coordinate receipt and monitoring of the data. That process could be combined with the role of 'lead partners' distributing funding to farmers and land managers in protected landscapes.

Specifically, where upland commons are a feature of land management in protected landscapes, the new Environmental Land Management Schemes will need to overcome the complexities of management associated with the upland commons so that outcomes for nature recovery can be achieved collectively and effectively. This may require specific, focused funding for the uplands as part of the current Farming in Protected Landscapes scheme and the future Environmental Land Management Schemes, which would necessitate land managers and farmers with local knowledge of the upland commons working together.

Local communities, which comprise people living and working in protected landscapes, are experts in the landscape with skills, expertise and knowledge in addition to those in farming and land management. It follows that local communities should be considered by DEFRA in the design of funding, and 'lead partners' in the distribution of funding for land management activity in protected landscapes that delivers nature recovery objectives. We note at page 14 of the Government's response 'The government will also support local communities through programmes such as the FiPL programme, which is helping farmers capitalise on the many social and financial benefits that the Visitor Economy generates in protected landscapes.' This is a welcome statement, but we would emphasise that local community consultation and engagement needs to involve all people in the community (rather than a group of community interests) from who thoughts and ideas should be actively sought.

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? YES

Providing AONBs with an equivalent second purpose to National Parks makes sense when both will be considered 'protected landscapes'. AONBs already enable people to connect with nature and landscapes so a second purpose relating to connecting people and places would recognise this role

officially. To fulfil the first and second purpose, AONBs would need the powers and resources to deliver on them.

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? YES

Please give reasons for your answer

There is ample evidence that access to nature improves people's health and wellbeing. To improve national health outcomes for everyone, but especially for people living in areas with poorer health outcomes and life chances, access to nature should be improved in every locality and be something that every Local Authority is tasked with delivering on. Protected landscapes can play their part in this by enabling access to nature for all parts of society to some of England's finest landscapes (although these landscapes should not be seen as the places where we 'go' to access nature as improving health and wellbeing can also be supported through improved access to nature on doorsteps and in neighbourhoods).

12. Are there any other priorities that should be reflected in a strengthened second purpose?

A strengthened second purpose on connecting people with protected landscapes should be designed in a way that clearly reinforces the first purpose and in no way undermines it. This could be achieved by a second purpose that places an emphasis on responsible access, nature connection (*Research shows that nature connection, rather than time in nature, is important in leading to pro-environmental behaviour (<https://findingnature.org.uk/2021/10/19/how-actively-noticing-nature-not-just-time-in-nature-helps-promote-nature-connectedness/>)*) and a public that is informed about how land uses affect habitats and the land's ability to store carbon naturally.

A second purpose with an emphasis on respectful nature connection could translate into strategic plans and specific actions, for example: 1) visitors being encouraged to connect with nature and the landscapes in ways that are respectful; 2) an increased emphasis on activity that gives back to nature as a way to experience a protected landscape (as opposed to any marketing emphasis on consuming nature); 3) an increased role for land managers in protected landscapes to facilitate experiences in nature for visitors (supported with funding via the ELMS); 4) sustained investment in ranger services which are a valuable interface between the visiting public and land managers, conservation bodies and others working in the protected landscape.

A second purpose on improving connections will require adequate resourcing, partnership and collaboration to adequately facilitate experiences and educate people about how to safely enjoy, experience and respect wild places in protected landscapes. As recommended for the first purpose, communities made up of people living and working in protected landscapes, as experts in the place itself, should also be supported (with accessible information and funding) to initiate activity that helps to realise the second purpose.

For example the John Muir Award (please see <https://www.johnmuirtrust.org/john-muir-award> for information) is sponsored and promoted by the Lake District National Park Authority to encourage people to enjoy, connect with and care for wild places and nature in the Lake District.

Through this scheme local schools (please see case study for Ennerdale and Patterdale schools: <https://www.johnmuirtrust.org/resources/485-commons-for-enner>) and community organisations encourage local people to access and take responsibility for their protected landscapes, and outdoor education providers do the same for visiting groups (please see case study for outdoor education residential in the Lake District National Park: <https://www.johnmuirtrust.org/resources/543-case-study-brilliantresidential-in-the-lake-district-national-park>).

The John Muir Award is used in all National Parks and most AONBs although it is only sponsored by the National Park Authority in the Lake District, Cairngorm and Loch Lomond and the Trossachs National Parks. For information on how the John Muir Award is used in England's National Parks please see a report from 2019: https://www.johnmuirtrust.org/assets/000/001/768/National_Parks_UK_Report_original.pdf?1627069505

The John Muir Award impacts positively on people, places and planet (please see impact reports available at <https://www.johnmuirtrust.org/john-muir-award/impact-and-updates>). Further sponsorship would increase the scope of this activity.

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? Tick all that apply.

- Issue Fixed Penalty Notices for byelaw infringements - tick
- Make Public Space Protection Orders (PSPOs) - tick
- Issue Traffic Regulation Orders (TROs) to control the amount and type of traffic on roads - tick

Please give reasons for your answer:

The Trust believes in public awareness campaigns and promoting the Countryside Code as a way to encourage respectful behaviours that enable all visitors to fully enjoy and benefit from these special places. In exceptional cases enforcement powers may need to be used to manage visitor pressures as a last resort, where a problem is recurring, and public awareness is not offering a solution. This should be very much a last resort.

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? YES

Please give reasons for your answer

Where used irresponsibly and unnecessarily this activity impacts greatly on other peoples' enjoyment of wild places as well as causing ecological damage. It does not support the proposed first purpose of protected landscapes and undermines the second purpose. The National Park Authorities and the Broads Authority and local highway authorities should have the power to redress behaviour that harms nature and peoples' access to nature. Balance of interests could be achieved with how the power is exercised and exemptions.

15. For which reasons should National Park Authorities, the Broads Authority and local authorities exercise this power?

- Environmental protection
- Prevention of damage
- Nuisance
- Amenity
- Other All of the above.

16. Should we legislate to restrict the use of motor vehicles on unsealed unclassified roads for recreational use, subject to appropriate exemptions? Yes – in National Parks and Areas of Outstanding Natural Beauty only

Please give reasons for your answer

General permitted use of 4x4 vehicles or motor bikes for recreational use in open country and wild places, which are also protected landscapes, is not compatible with several objectives. These are not respectful ways to enjoy wild places and protected landscapes; their use restricts the ability of others to experience these places, disturbs wildlife and is not climate friendly. We see that there could be exceptions, for example, a person who is seeking to experience a landscape who has a limited range of mobility. There could be case by case exemptions to a general rule that prohibits recreational use of motor vehicles on green lanes.

17. What exemptions do you think would be required to protect the rights and enjoyment of other users e.g., residents, businesses etc? Access for those with restricted mobility in exceptional circumstances

18. What roles should AONBs teams play in the plan-making process to achieve better outcomes?

AONB are not planning authorities, but they should certainly be consulted on the creation of Local Plans that cover an area that includes their AONB (a recommendation of the Glover review). The guidelines for deciding proposed development within protected landscapes need to be informed by bodies with a statutory responsibility for safeguarding the landscapes and nature's recovery. For any plan-making process, AONB teams should be consulted for their advice and recommendations for how draft planning policies or planning decisions will (or will not) contribute to the purposes of the AONB.

19. Should AONB teams be made statutory consultees for development management? Yes

Please give reasons for your answer:

The AONB teams have existing local knowledge and specialist understanding to evaluate potential impacts of proposed development carefully. In this respect they will have a lot of knowledge to bring to the planning decision making process which should result in better decisions. Being a statutory consultee will require resourcing and to be effective, any newly created roles would require knowledge and understanding of landscape, nature, biodiversity and planning.

20. If yes, what type of planning applications should AONB teams be consulted on?

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

Local governance (p20)

21. Which of the following measures would you support to improve local governance? Tick all that apply.

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

Please give reasons for your answer:

Greater diversity on Boards is something that should be pro-actively sought and will result in greater diversity of thought, greater representation of different interests and perspectives within society, leading to a greater likelihood of fairer decision making. Ways to achieve greater diversity on Boards include merit based criteria and greater use of advisory panels. Merit based criteria is also important as Board members need to bring the knowledge and understanding and skills needed for Boards to make strategic decisions that are in the long-term interest of nature recovery within the protected landscape. Adequate training and materials is an on-going requirement for all Boards to function well and should be a source of continuous improvement. Removing under-performing Board members protects the reputation and credibility of the Board and should also support continuous improvement objectives. Reducing Board size to a manageable number should help Boards to function and fulfil their obligations more efficiently.

Please also see our answer provided in response to Question 25.

A clearer role for public bodies (p22)

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

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

General power of competence (p24)

24. Should National Parks Authorities and the Broads Authority have a general power of competence? [Decline to comment](#)

Overall

25. If you have any further comments on any of the proposals in this document, please include them here. [FREE TEXT]

On the statutory purpose (question 6) – we support the revised statutory purpose and believe that a stronger purpose for nature recovery needs to acknowledge that our protected landscapes have to become much wilder places. An explicit commitment or acknowledgment to making places within protected landscapes wilder will give greater credibility to the UK Government’s 30% for nature by 2030 target. On a practical level, achieving nature recovery requires National Park Authority staff to work alongside land managers and other specialist partners (e.g. environmental charities, communities) at specific sites, forming and encouraging partnership approaches, sharing knowledge and expertise. In this way, a National Park Authority can lead by example, demonstrating that partnership working is a powerful and impactful way to work. To achieve the revised purposes, National Park Authorities, the AONB teams, and the public sector partners (Natural England, Environment Agency) they work closely with, need adequate, sustained and committed funding. Having expert, experienced and skilled staff in post is critical for meeting the required improvements.

On improving local governance (question 21) - the amount of work required in being a Board member can make these positions untenable for many people in society. This is a factor that undermines the diversity of Boards when diversity and inclusion should be a normal way of working for an organisation’s governing body and operations. More flexibility in designing the role of a Board member and providing professional support to Board members could help. Online and evening meetings may also facilitate a broader range of participants. Boards of the National Park Authorities and the AONBs need to represent different viewpoints and expertise, including dedicated appointees with professional expertise in local landscapes, local perspectives as well as national, but also importantly statutory appointees with nature expertise. At present the balance of National Park Authority Boards can be in favour of land owning and agricultural interests at the expense of diversity, inclusion and expertise. More representation from professional experts and statutory appointees would help make Board decisions more balanced. Board appointments should not be politicised. We agree with the Glover recommendation that Board sizes should be capped to a number that’s in line with best practice as this would aid decision making processes.