

## OVA Submission of evidence to the Glover Landscape Review



## Response ID ANON-MW92-FM69-H

Submitted to **Landscapes Review: Call for Evidence**

Submitted on **2018-12-15 14:17:33**

### About you

#### 1 Are you replying as a member of the public or on behalf of an organisation?

Organisation

#### 2 If you are replying as a member of the public

What is your name?:

If you enter your email address then you will automatically receive an acknowledgement email when you submit your response. We may also use this to contact you further.:

#### 3 If you are replying on behalf of an organisation or organisations

Which organisation(s)?:

The Otter Valley Association (OVA). The OVA, a civic amenity charity with approximately 800 members, was founded to promote and conserve the environment, landscape and history of the lower Otter valley, East Devon. It was established for the public benefit in the area comprising the civil parishes of Budleigh Salterton, East Budleigh and Bicton, Otterton, Colaton Raleigh, Newton Poppleford and Harpford. This area is situated entirely in the East Devon Area of Outstanding Natural Beauty (AONB) and all of the coastline is within the Jurassic Coast World Heritage Site.

What is your name and position?:

Penny Kurowski, Honorary Secretary

If you enter your email address then you will automatically receive an acknowledgement email when you submit your response. We may also use this to contact you further.:

pandp@kurowski.me.uk

#### 4 We would like to be able to use extracts from submissions in our final report. If you would not like them, potentially, to be made public, please tell us here.

Yes, I am content for you to use extracts of my response in the final report

#### 5 We have obligations under freedom of information laws and there is more information below. For the purposes of these laws, would you like your response to be confidential?

No

If you have answered yes, please give your reason:

### Before anything else

#### 6 We would love to know what makes National Parks and AONBs special to you

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Yes, you can use my photo online or in the report

### Part 1 - Opening thoughts

#### 7 What do you think works overall about the present system of National Parks and AONBs in England? Add any points that apply specifically to only National Parks or AONBs

Please write your answer here:

Devon has the two National Parks (NPs) of Dartmoor and Exmoor and five Areas of Outstanding Natural Beauty (AONBs) including the East Devon AONB (EDAONB) in which the River Otter sits. The Otter Valley Association's (OVA) area of benefit covers part of the River Otter, so our answer is based on our knowledge of Devon.

NPs benefit greatly from independent management boards funded by Defra, with no financial or politically biased interests in the area under management. These boards have regulated powers granted by Government, which allow for a consistent approach to land management. Furthermore their role as the overall Planning Authority enables consistency across the whole NP area, taking local natural features into account to determine how developments sit within the specific landscape, the effects on rural life and its environment, in full accordance with the National Planning Framework and maintaining the rural and cultural habitats and heritage to the benefit of all.

NPs additionally promote understanding and enjoyment of the areas special qualities. The OVA has explored the majority of both NPs via organised walking trips for members, enabling all to see the consistency of approach to and protection of the environment for wildlife, landscape and public access. Adherence to the designations of protected landscapes and the following of national planning guidance, has maintained the fragile beauty of the landscape, ecology and cultural heritage of the parks. It is very evident the two purposes of NPs work together to maintain and enhance these special areas.

AONBs are managed by partnerships of local landowners, regional and local councils, local associations and national and regional agencies, of which EDAONB is no different, each with their own financial or political agendas. Living within EDAONB means OVA members are traveling through its area of benefit on a daily basis, witnessing the changes and improvements the AONB is making. There have also been several successful landscape projects both started and completed, managed and funded by the EDAONB over the years. EDAONB is one of only two AONBs in England that include a UNESCO World Heritage Site, The Jurassic Coast, the other being the Dorset AONB. With major new housing infrastructure increasing footfall on the areas for recreation, the protection afforded by the AONB and its projects to enhance the area has never been more important, maintaining the original justification of making this area into an AONB and why it is special to the members of the OVA.

There is a big difference in the areas over which NPs have influence in protecting natural beauty and those of the AONBs. The purposes of NPs are to conserve and enhance the natural beauty, wildlife and cultural heritage across the park as a whole, all possible through the better national funding and wider management structure. As most AONBs' purposes are just to conserve and enhance the natural beauty, their much reduced funding restricts the number of projects they can complete and there is no requirement to promote understanding and enjoyment of the area.

## **8 What do you think does not work overall about the system and might be changed? Add any points that apply specifically to National Parks or AONBs**

### **Please write your answer here:**

Devon has the two National Parks (NPs) of Dartmoor and Exmoor and five Areas of Outstanding Natural Beauty (AONBs) including the East Devon AONB (EDAONB) in which the River Otter sits. The Otter Valley Association's (OVA) area of benefit covers part of the River Otter, so our answer is based on our knowledge of Devon.

AONBs, like EDAONB, are managed by partnerships of local landowners, regional and local councils, local associations and national and regional agencies, each with their own financial or political agendas. Many of these have their own agendas in respect of planning, rural development and diversity, or financial interests. Having so many partners with strong local ties, along with the much weaker remit to just conserve and enhance the natural beauty, means there is no requirement or prospect to promote understanding and enjoyment of the area. With little if any impact on planning considerations and no formal recognition, AONBs have no opportunities to ensure local and rural heritage and beauty assets are protected for the future.

In 1998 in its 'Protecting our finest countryside: Advice to Government', the Countryside Commission stated: "There needs to be an end to arguments about first and second division designated areas. The Government should confirm that the landscape qualities of NPs and AONBs are equivalent and that equivalent policies for their protection against inappropriate development are in place". The Commission went on: "The Government should legislate to create an explicit statutory obligation on all public bodies (including local authorities), in exercising their functions in relation to or so as to affect an AONB". Such a duty was imposed in relation to NPs by Section 1A (2) of the National Parks and Access to the Countryside Act 1949 (inserted by Section 62(1) of the Environment Act 1955), but not in respect of AONBs. Now is the opportunity to redress that mistake, provide AONBs with much stronger powers and objectives in line with the NPs, protecting what is left of our national heritage of landscape and environment. Even better, would be to merge EDAONB with Dorset AONB to form a new NP, taking in the Jurassic Coastal areas currently excluded from the AONBs.

## **Part 2 - Views**

### **9 What views do you have about the role National Parks and AONBs play in nature conservation and biodiversity?**

#### **Please write your answer here:**

Both AONBs and National Parks (NP) play an essential role in conserving nature but there is a significant difference in their primary purpose. Both designations share the aim of conserving natural beauty (including flora, fauna, geological and physiographical features), but in AONBs this does not expressly include the purpose of conserving and enhancing wildlife, cultural heritage, public education and enjoyment.

We are based in East Devon and feel that East Devon and Dorset AONBs have a distinctive and valuable ecology which are important on a national scale and this justifies their consolidation within a new NP which will provide the highest level of landscape and wildlife protection.

#### **Could they do more to enhance our wildlife and support the recovery of our natural habitats?:**

Connectivity between habitats is an essential component of conservation and the relatively small scale of our AONB in East Devon limits the contribution that this special area can make. If persecution and habitat destruction can be controlled/eliminated, the next biggest threat to wildlife is the fragmentation of breeding colonies. Isolation and confinement of an otherwise viable population can leave individual members prone to disease and predation and to a reduction in the diversity of the gene pool of the group. An example of this is the rare Wood White butterfly (*Lepidea sinapsis*) which survives in the wooded areas of the "Undercliff", west of Lyme Regis. Unfortunately, this location occupies an area on the boundaries between the AONBs of East Devon and Dorset and effectively illustrates the shortcomings of the designation of an AONB. Their aim is to conserve the natural beauty of an area but does not necessarily maintain connectivity between habitats which is essential to long-term survival of species. A "wildlife corridor" (Rosenberg et al., 1995) fulfills the need for links between wildlife habitats joined generally by natural vegetation. These corridors enable migration, colonisation and interbreeding of plants and animals, preventing the decline in biodiversity across a landscape. There is a strong argument, therefore, for incorporating the area of the two AONBs into a new National Park, where the specific remit prioritises wildlife and supports the recovery of habitats.

#### **References:**

Rosenberg, Daniel K.; Noon, Barry R.; Meslow, E. Charles (1995). "Towards a definition of wildlife corridor". Integrating People and Wildlife for a Sustainable Future. Proceedings of the First International Wildlife Congress: 436-9.

## **10 What views do you have about the role National Parks and AONBs play in shaping landscape and beauty, or protecting cultural heritage?**

### **Please write your answer here:**

We are responding as the Otter Valley Association, based in East Devon, and our response reflects our local experience.

**WIDER PICTURE.** National Parks (NPs) play a vital role in Devon but the role played by AONBs is not so clear cut. Devon is a county of unparalleled natural beauty, largely isolated by its complex topography from the rest of England until the mid-18 Century. There are two National Parks covering the unique upland areas of Dartmoor and Exmoor and five AONBs in the lowland areas. Thirty five percent of Devon lies within one of these designated areas. There are historic market towns, seaside resorts and Saxon villages superimposed on a landscape still showing evidence of Iron Age settlement. It is increasingly seen as an attractive place for tourism and as a place of retirement. Devon has a rural economy based on food, forestry, energy, tourism and small footprint industry. Past, present and future agricultural practices are a dominant influences on the landscape.

**LOCAL PICTURE.** In our Local Authority, East Devon District Council (EDDC), two thirds of the area is covered by the East Devon and Blackdown Hills AONBs. The whole of East Devon's coastline forms part of the World Heritage Site "The Jurassic Coast", which continues into Dorset. Despite the constraints imposed on land use, EDDC has chosen to adopt an ambitious house building Local Plan, substantially higher than its demographic need. There is therefore pressure not only to find land for development and employment, but also to provide recreational space for the 142,300 inhabitants (2017) in East Devon (and 129,800 in Exeter next door). It should be noted that there is no green belt surrounding Exeter to prevent urban sprawl.

Our AONB governance model with its advisory role, hosted by the local district authority, seems ill suited to influence the competing demands of housing for national needs, housing for local needs, employment land, recreation and managing the changes agriculture will face post Brexit. In contrast our two Devon NPs, with their wider social, economic well-being and cultural protection remit, regulate the housing needs of the area and emphasise the local vernacular in new developments.

## **11 What views do you have about the role National Parks and AONBs play in working with farmers and land managers and how might this change as the current system of farm payments is reformed?**

### **Please write your answer here:**

We are responding as the Otter Valley Association, based in East Devon, and our response reflects our local experience.

Devon has two National Parks (NPs) which benefit greatly from independent management boards funded by Defra, with no financial or politically biased interests in the area under management. These boards have regulated powers granted by Government, which allow for a consistent approach to land management and planning applications across the parks, maintaining the rural and cultural habitats to the benefit of all. Devon also has five AONBs, which are managed by partnerships of local bodies and companies, each with their own financial or political agendas. This lack of independence greatly restricts the protective influence of these AONBs over their areas.

Fifty years of Common Agricultural Policy (CAP) linked to the EU has seen many changes over how farming is funded, from a mainly high production basis to the current environment based scheme. This is now set to change again as Brexit in 2019 will trigger from 2021 an end to the land based direct payment linked system by 2027. Payments will be linked instead to environmental enhancements, reducing ammonia emissions, planting trees and maintaining hedgerows as habitats for wildlife. The planned transition period is to be longer than a term of Government, enabling farmers to enter longer term (10 year) contracts to stabilise income and farm growth. Most of Devon's two NPs are farmed by small family units, some privately/family owned, but a large proportion on Duchy of Cornwall or National Trust (NT) land through farm tenancies. Under NP guidance and support along with stewardship schemes, these farms have begun rebuilding stone walls, managing bracken and gorse growth, improved grassland quality and heathland productivity.

The NPs support of Pillar II Development Schemes have enabled some farms to diversify into B&Bs, farmed meat outlets, outdoor activity centres and opportunities to expand school education programs. But AONBs do not benefit from such independent management programs. East Devon AONB (EDAONB) is a mixture of land owned by a large private estate, some NT land, tracts of county and local authority land along with privately owned areas of farmland and woodland. Clinton Devon Estates (CDE) is the largest land owner, whose land includes some of the richest and most intensively farmed areas along with the Pebblebed Heaths. East Devon District Council (EDDC) owns large tracts of land alongside the River Axe, which have been diversified into wetlands with major visitor facilities. There are other areas within the east of the AONB also owned by EDDC that have benefited from projects run by EDAONB.

It is the lack of the second part of NP designation that prevents the AONBs from being more involved and supportive of the independent section of farming, only the larger landlords like CDE, NT, EDDC can promote AONB projects as they have the financial stability to bear the costs. Changing EDAONB, Dorset AONB and all the Dorset & East Devon World Heritage Site into a combined NP would provide the many smaller family farms with the guidance and support, plus additional funding, to enable them to make major enhancements to their environment.

## **12 What views do you have about the role National Parks and AONBs play in supporting and managing access and recreation?**

### **Please write your answer here:**

From our experience in Devon, there is a clear difference between the way the National Parks (Dartmoor and Exmoor) and our local AONB, East Devon (EDAONB), operate.

The National Parks each have a clear and iconic identity, which is enhanced by their promotion of their areas as places for recreation and enjoyment. Better resourced than AONBs, the National Parks have Visitor Centres, Ranger Teams, and run programmes of walks and other events. This means that access to the area is clear and well managed, and visitors and residents have a wealth of opportunity to explore and enjoy these areas to the full.

By contrast, EDAONB lacks an identity and, apart from the occasional sign on its boundaries it has a low public profile. The lack of resource means that the management team is small, and has limited impact. RECREATION appears to be provided by the EDAONB Partnership which is a loose collection of organisations within the AONB. There are a large number of recreational opportunities, but these are not co-ordinated or marketed as AONB specific. For

example The Otter Valley Association, Sid Vale Association and East Devon Ramblers all have walks programmes, but whilst these often take place in the EDAONB, the AONB is not a focus for them. The EDAONB website does signpost to these organisations, and East Devon District Council (EDDC) provides some kind of co-ordinated, but not comprehensive, guide across its area, but of course its area is larger than the EDAONB which sits within it.

ACCESS, is not something that EDAONB is able to influence directly (with the exception of the 40 mile long distance footpath, the East Devon Way which the team manage and promote well). Again any work is done by members of the Partnership and arguably would happen regardless of the AONB.

EDAONB has swathes of open land (the Pebblebed Heaths) and many miles of the South West Coast Path, a wonderful network of footpaths and of course the sea shore, all of which appears to be managed in a piecemeal rather than a co-ordinated fashion as it could be if the AONB was better resourced.

An AONB, whilst aiming to protect the landscape within which access and recreation can happen, has neither the resources nor specific role to support and manage them. Better resources and perhaps a different designation (Dorset and East Devon National Park?) would enhance access to the opportunities that are already available within this wonderful landscape. It could, at least, be helpful to strengthen the AONB purpose to include promoting to the public opportunities for understanding and enjoying the special qualities of the AONB.

### **13 What views do you have about the way National Park and AONB authorities affect people who live and work in their areas?**

#### **Please write your answer here:**

We are responding as the Otter Valley Association (OVA), based in East Devon, and our response reflects our local experience.

Our experience from meeting those living and working in the Dartmoor National Park is that they view the NP authority in a positive light. This includes the farming community. In contrast many residents of East Devon AONB are largely unaffected by the designation, many are ignorant of it.

#### **Are they properly supporting them and what could be done differently?:**

An AONB, by definition, plays a much less active role in supporting the local community than a National Park especially in promoting public enjoyment and having regard for the social and economic well-being.

The East Devon AONB (EDAONB) has many laudable objectives in its Strategy Management Plan, but it has no influence to fulfil them, eg the needs of the local rural community with regards to affordable housing. Many strategies are outside EDAONB's remit and this is a dilution of their meagre resources eg development of links with tourism and accommodation providers.

Their Key objective "2.3 Planning development and policy protects the special landscape character and tranquillity of the AONB and will enable appropriate forms of social and economic development that are compatible with the landscape, so conserving and enhancing the environment" would indicate that the management team are actively involved in planning development. The Plan has as a priority action to "Respond to planning consultations in accordance with the AONB protocol as resources allow". However, the OVA's area of benefit, lying entirely within the AONB, very rarely sees any advisory comments from the AONB team with planning applications. The AONB has no influence on promoting local skills and promoting the local economy. AONB powers would benefit from strengthening.

### **14 What views do you have on the role National Park and AONB authorities play on housing and transport in their areas?**

#### **Please write your answer here:**

AONB management teams are ineffectual. Given the National pressure for more housing development, we would draw attention to the recent National Trust case study (2015) of major planning applications in AONBs. In the majority of major development cases the need to show exceptional circumstances that the development was in the public interest was carried out only weakly. This corresponds to our local experience in the East Devon AONB.

In contrast to National Parks, AONB management teams have no responsibility for the provision of local housing needs and especially affordable homes. As a result AONBs can suffer excessive development where the availability of non-designated land is limited with the locally employed squeezed out, such as in EDDC.

A National Park can actively influence rural transport in its area more than that of an AONB.

## **Part 3 - Current ways of working**

### **15 What views do you have on the way they are governed individually at the moment? Is it effective or does it need to change, if so, how?**

#### **Please write your answer here:**

Our local authority, East Devon is an example of a local authority with ambition to deliver a housing plan substantially above demographic need with only one third non-designated land. Our experience is that the small AONB advisory management team, hosted within the local authority, is ineffective in making a case against planning applications within the AONB if that case runs contrary to the local political wind.

For example, in commenting on planning application 17/3022, the formal comment from the AONB management team to the planners is best described as neutral. This application was to extend a major heavy engineering works into a discontinued quarry site due to be returned to heathland. The site lay in the sensitive Pebblebed Heaths, a European designated site. This application cannot be described as "Conserving and Enhancing" and there is no shortage of alternative employment land outside the AONB, yet it was approved.

In another example, the AONB made no comment whatsoever in any of the three applications starting with 13/0316 to develop 40 houses outside a Village Built Up Area Boundary on a ridge line within the AONB which received 383 objections from a population of 1,700. From a democratic perspective the AONB team was perceived to be compromised as the local AONB partnership chair was occupied by a senior executive of the Estate submitting the application.

SOLUTION: A National Park would solve this. Failing that, management of AONB should have Conservation boards modelled on National Park practice, such as used in the Cotswolds. This would provide a better structure to resolve these conflicts of interest.

**16 What views do you have on whether they work collectively at the moment, for instance to share goals, encourage interest and involvement by the public and other organisations?**

**Please write your answer here:**

Our experience is that our East Devon AONB tends to focus on peripheral "safe" matters and involves and consults with the public on these matters and not on the core issue of whether or not proposed Local Authority actions will conserve and enhance the area.

The AONB has as a Key Objective 2.6 "Improved access to services and facilities and the active participation in community and appropriate landscape related social enterprise." and has managed and funded several community projects over the years but the majority of these have been carried out in the east of the area on land owned by the funding local authority. The East Devon AONB is not visible in the west of its area.

**17 What views do you have on their efforts to involve people from all parts of society, to encourage volunteering and improve health and well-being?**

**Please write your answer here:**

From our experience in Devon, there is a clear difference between the way the National Parks (Dartmoor and Exmoor) and our local AONB, East Devon (EDAONB) operate.

The National Parks have the benefit of resources not available to AONBs, and so are able to market their areas and the opportunities available much better and more widely than, in our experience, the EDAONB. They also have ranger teams and visitor centres, enabling them to better engage with visitors and residents, and promote activities to improve health and well-being.

Both National Parks have volunteering programmes, which encourage the public to get involved in a range of activities. We do not have enough experience of the National Parks to comment on how inclusive their activities are.

EDAONB does not have its own programmes of activity, apart from some very geographically specific lottery-funded projects. It is noticeable that most of its activity is focused on the east of its area. The AONB website does signpost to volunteering opportunities which are run by members of the AONB partnership. It could be helpful to strengthen the AONB purpose to include promoting to the public opportunities for understanding and enjoying the special qualities within the whole of the AONB.

**18 What views do you have on the way they are funded and how this might change?**

**Please write your answer here:**

The present funding system for both National Parks and AONBs is uncertain and needs reform in the context of the 25 year Environmental Reform and the changes Brexit will bring to the ways agricultural subsidies are distributed.

We feel that increased funding to AONBs, linked to clear and agreed outcomes, would greatly strengthen their ability to conserve and protect their landscapes.

**19 What views do you have on the process of designation - which means the way boundaries are defined and changed?**

**Please write your answer here:**

Where the efforts to conserve wildlife and natural landscape conflicts with the expansion of the built environment within an AONB, the case for redefining the level of protection is vital.

For example, in our area within the East Devon AONB, the recent encroachment of the Jurassic Coast World Heritage Site by a holiday park (Ladram Bay), the proposed demolition of a roosting building for rare bats (East Budleigh), and the continued industrial occupation of heathland sites (Blackhill Quarry) undermine the value of the designation. This makes the case for stronger controls which only a National Park can fulfill and brings with it more significant changes in the administration of the area.

The Sandford Principle (1974) states that "Where irreconcilable conflicts exist between conservation and public enjoyment, then conservation interest should take priority". This principle was updated in the Environment Act (1995) as: "If it appears that there is a conflict between those purposes, the National Park Authority shall attach greater weight to the purpose of conserving and enhancing the natural beauty, wildlife and cultural heritage of the area". On too many occasions this principle is not applied in the East Devon AONB. Planning considerations for housing and development often override environmental issues and nature conservation.

**References:**

The Sandford Principle: National Parks Policy Review committee, 1974.

**20 What views do you have on whether areas should be given new designations? For instance, the creation of new National Parks or AONBs, or new types of designations for marine areas, urban landscapes or those near built-up areas.**

**Please write your answer here:**

The OVA (Otter Valley Association) asks the Glover Review panel to support a Dorset and East Devon National Park and to ask Natural England to undertake a full assessment at the earliest opportunity.

This Dorset & East Devon NP, working with partners including councils and communities, voluntary societies, land managers and businesses would

- make a vital contribution to landscape-scale conservation,
- increase the biodiversity of the environment with a continuous wildlife corridor,
- promote understanding and enjoyment of the area's special qualities by the public, including cultural heritage and the social and economic well-being of those living within them.

The historic heritage includes Iron Age hill forts, Saxon villages, Georgian resorts and numerous castles. In addition, it would be the first English NP with an international designated coastline of outstanding geo-diversity and geo-morphology which would support the conservation of the marine environment. The coastline has mudflats, salt marshes, unique pebblebeds and flood plains, all with a strong maritime history. The Dorset proposal also includes the idea of incorporating an offshore marine conservation area: Lyme Bay, amongst other things, has rare cold water coral and marine species such as seahorses.

The European SPA and SAC site of the Pebblebed Heaths is home to the rare Southern Damselflies, the Dartford Warbler and the Silver-studded Blue butterfly. This is all less than an hour from the major conurbations of Exeter and Dorchester.

The area already fulfils the recreational criteria with open spaces; peaceful woodlands; tranquil vales; ancient trees; and heathland. There is a variety of walking, horse-riding and cycling routes for all abilities including the South West Coast Path. Therefore there are already facilities in place to support tourism. A new NP incorporating Dorset and East Devon would be better placed to attract funding to enhance and support a sustainable tourist industry.

Devon is the fifth most dependent sub-region on tourism with about 5.5% of the output of all economic activity attributable to tourism expenditure. Strategy 33 of East Devon District Council's adopted Local Plan states: "Tourism growth should be sustainable and should not damage the natural assets of the District but aim to attract new tourism related businesses that can complement the high quality environment of East Devon."

We believe the creation of a new National Park covering East Devon and Dorset AONBs would provide a better stimulus than can be achieved by the two AONBs acting alone. It would be better placed to attract funding to enhance and support a sustainable tourist industry.

## **21 Are there lessons that might be learnt from the way designated landscapes work in other parts of the United Kingdom, or abroad?**

**Please write your answer here:**

The Dorset AONB coastal region contains large tracts of MOD land. The Lulworth Ranges cover 2,830 hectares and is a SSSI. The South West Coast Path runs through the Ranges. Areas such as these, not specifically managed for conservation, can have unintended benefits for flora and fauna and are deserving for inclusion in a new National Park.

Lessons may be learnt from biologists monitoring the European Green Belt, a UNESCO World Heritage Site which follows the route of the former Iron Curtain. It connects redundant military transboundary areas, National Parks, nature parks and biosphere reserves. Observations by biologists have revealed that the military practice areas along the old borderline have led to unexpected enhancement of wildlife in numerous ways:

- Bans on pesticide spraying has preserved many rare insects
- Keeping the vegetation cut has stopped the area from becoming continuous forest and has preserved wildlife that live on open land
- Old landmine craters have become wildlife-rich ponds
- Natural river and stream banks have been preserved
- Restricted access for the general public has preserved wildlife and flora

## **Part 4 - Closing thoughts**

### **22 Do you think the terms currently used are the right ones? Would you suggest an alternative title for AONBs, for instance and if so what?**

**Please write your answer here:**

### **23 The review has been asked to consider how designated landscapes work with other designations such as National Trails, Sites of Special Scientific Interest (SSSIs), Special Areas of Conservation (SACs), National Nature Reserves (NNRs) and Special Protected Areas (SPAs). Do you have any thoughts on how these relationships work and whether they could be improved?**

**Please write your answer here:**

Whilst recognising that each designation is distinct, the public perception is that they seem to generate too many Quangos.

### **24 Do you have any other points you would like to make that are not covered above?**

**Please write your answer here:**