



# Northumberland

## County Council

### Communities and Place Overview and Scrutiny Committee

3 June 2020

#### **Briefing Note: Update concerning a potential boundary review for the Northumberland Coast AONB**

##### Introduction

When the idea of requesting a boundary review of the Northumberland Coast AONB was last discussed at Scrutiny Committee, I suggested that given the costs involved in gathering the evidence for any such review it would be appropriate to wait until a decision had been made concerning the proposed Highthorn surface mine, and until the Government review of National Parks and AONBs (the Glover Review) had been completed.

##### Progress to date

Unfortunately, although a decision on Highthorn has been 'imminent' for some time, it has yet to be made. Regarding the review of National Parks and AONBs, the review team's recommendations regarding boundary reviews and new designations is as follows:

#### ***Proposal 22: A better designations process***

*Many call for evidence responses lamented the complexity and length of the designations process. Few set out how to make it better.*

*Natural England is currently responsible for designating new landscapes including boundary changes to existing designations, which it is then for the Defra Secretary of State to 'confirm'. It appears to be an overly-technical, legalistic, under-resourced and defensive process but we do not think it is fundamentally flawed. Any system of designation will need to hear evidence, face conflicting views, reach decisions and inevitably disappoint some.*

*In the last 20 years Natural England has designated just the South Downs and New Forest National Parks and extended the Yorkshire Dales and Lake District National Parks, the first two being already mostly designated as*

*AONB. In the 50 years prior to that some 42 landscapes were designated as National Parks or AONBs, covering about 11,120 square miles.*

*Natural England's guidance sets a negative tone for designations, pointing out that they only get out of the starting gate if there is "availability of resources" and are considered of "relative importance against other work priorities". Natural England also has a long list of new areas proposed by others to work through, estimated at over 3,080 square miles, which at the current rate of progress will take them at least 50 years to get through. These are listed at Annex 4.*

*Local groups who campaign for new designations have a minimal role in the process. Consultation has become excessive, with multiple rounds of 12-week consultations. The law does not help, with a requirement to publish legal notices in local papers, not keeping up with modern ways of communicating, and often at a disproportionate cost. Natural England has been working to improve the process that it follows and has helpfully shared some suggestions that we think have merit, including involving local groups more in gathering evidence and exploring the scope for a simplified process for smaller boundary variations.*

*These should be worked up in a way that retains the integrity of the process and continues to give those with an interest an opportunity to input views. Above all, this activity should be properly resourced and given greater priority, as this is the main reason for the long delays. We think that a new National Landscapes Service should be home to this work in the future.*

The Glover Report was received by Defra in September 2019, and can be found [here](#). Defra currently has a small team working on the Government's response to it, which is due to be published this autumn.

### Options

As we discussed previously, the options remain to start to gather evidence in support of a request for a boundary review in advance of the Highthorn decision and the changes that will be brought about in response to the Glover Report, or to wait until we have the Highthorn decision and the Government has responded to the Glover Report.

Should a National Landscape Service be established in line with Glover's recommendations, it will have responsibility for new designations and boundary reviews and will therefore presumably establish a system that is far more effective than the current arrangements which, as noted above, have virtually ground to a halt. Accordingly, if the Council invests in gathering evidence to support a boundary

review in advance of any guidance from the NLS about how the process will work or what evidence it will require, this will carry some risks, in terms of work that is required not being carried out or work being carried out that isn't actually required. A report analysing the landscape around in the AONB in relation to current designation criteria would be likely to cost around £10-15,000, for which there is no budget at present.

Waiting until the National Landscape Service has been established and then seeking a boundary review based on their new and hopefully much improved system would avoid these risks and ensure that the evidence presented in support of a boundary review is exactly what the NLS requires. The obvious disadvantage of this approach is that it is a further delay; however any delay is probably more illusory than real given that the existing system is working so slowly.

#### Recommendation

My recommendation is to wait; there seems little point spending money to meet the requirements of a system that is about to end, given that we will simply be joining such a long queue, and we won't know if the documentation we prepare to do this will be transferable to the new system. Furthermore, one of the reasons why the 2007 study advised that the Druridge Bay landscape would not meet the designation criteria was the relative immaturity of the landscape following restoration of a series of surface mines, which strongly suggests that the passage of time can only benefit the Council's case. However, if the Committee would like the Council to commence evidence-gathering now, the next step will be to determine where the resources for this could come from.

David Feige, Principal Ecologist and AONB Officer  
19 May 2020