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The Rt Hon Elizabeth Truss MP
Secretary of State

Dear Mr Cross

EXTENSIONS TO THE YORKSHIRE DALES NATIONAL PARK

1. The Secretary of State has now considered with care the proposed extensions to the Yorkshire Dales National Park (“YDNP”) as reflected in the Yorkshire Dales National Park (Designation) (Variation) Order 2012.
2. The Secretary of State has considered in particular the report of the Inspector, Mr Roy Foster MA MRTPI (“the Inspector”). The Inspector held a public local inquiry under Part I of the First Schedule to the National Parks and Access to the Countryside Act 1949 (“NPAC 1949”), paragraph 2(2)(a).
3. This letter sets out the decisions reached by the Secretary of State following the conclusions and recommendations made by the Inspector.

Background to the Inquiry and the Inspector’s Report

4. In January 2012 following extensive consultation on its initial proposals, Natural England made two Variation Orders for proposed extensions to the Lake District National Park (‘LDNP’) and the Yorkshire Dales National Park (‘YDNP’).
5. The Variation Order in respect of the YDNP proposed to extend the National Park by approximately 25% in two separate areas, hereinafter referred to as the Yorkshire Dales Northern Extension Area (‘YDN’) and the Yorkshire Dales Western Extension Area (‘YDW’).
6. The YDNP was designated in the 1950s, and much of the land proposed for inclusion by Natural England had previously been earmarked for potential inclusion at that time. However the land was not previously included due to an emphasis on administrative boundaries and main roads in determining the boundaries at that time (as discussed at 3.206 of the Inspector’s Report (‘IR’)).

7. During the six week consultative deposit period Defra received over 3000 representations about the Orders. About 7% of the representations expressed outright objection to the designation of some or all of the land in the extension areas while about 90% expressed either total or partly-qualified support.
8. There were objections from five local authorities. Given that it is a statutory requirement to hold a Public Inquiry if any local authority within an affected area raises an objection (Schedule 1 paragraph 2(2) of NPAC 1949), the Secretary of State asked the Planning Inspectorate to convene an Inquiry which was held in June 2013.
9. The remit of the Inquiry was to provide advice as to whether:
 - a. the extension areas, as specified in the two Orders, when taken together with the designated land to which they would be added, meet the criteria and purposes of designation as a National Park as set out in the NPAC 1949; and
 - b. the new boundaries proposed in the two Orders should be modified to include or exclude any areas specifically referred to by objectors, bearing in mind the criteria and purposes of designation.
 - c. The Inspector submitted his Report to the Secretary of State on 15 October 2013. That report is being made public alongside this letter and is available on the National Parks pages at www.gov.uk/defra (References to this report appear as 'IR' below).
10. In terms of the YDNP the Inspector makes the following recommendations:
 - a. That, with two minor exceptions, the Order setting out two proposed extension areas to the YDNP, i.e. the YDN and YDW, should be confirmed since they meet the statutory criteria for inclusion in the YDNP (IR 5.4-5.7).
 - b. The minor exceptions relate to:
 - i. the boundary of the YDN south of Reagill which the Inspector recommended should be re-defined by Natural England (NE) (IR 5.5, 5.7) (see map at Annex 2); and
 - ii. the small area of land at Lowgill Farm which the Inspector recommended should be omitted from the Order (IR 5.6, 5.7) (see map at Annex 3).
11. Accordingly, the Secretary of State's decisions are to be made against a background of an extensive and inclusive examination of the issues. All those who are interested in the proposals have had the opportunity to make their views known during the Inquiry and the issues have been examined in considerable detail by an expert and experienced Inspector. The Secretary of State has placed very considerable weight on his conclusions.

Summary of the Secretary of State's conclusions

12. The Secretary of State has discretion, after considering the Inspector's report, to confirm the Order with or without modifications: see paragraph 2(2) of Schedule 1 to NPAC 1949.
13. Following that consideration and for the reasons set out in more detail at Parts I and II of this letter, the Secretary of State has reached the following conclusions in relation to the YDNP:
 - a. The Inspector's recommendations should be accepted in their entirety i.e. subject to the two minor exceptions, the Order setting out two proposed extension areas to the YDNP should be confirmed since the areas meet the statutory criteria for inclusion in the YDNP (including the requirement that it is especially desirable that the necessary measures are taken for the purposes specified in s5(1) of the 1949 Act i.e. the statutory National Park purposes).
 - b. The Order should take effect from 1 August 2016 to permit local arrangements to be made to transfer the planning role and address the make-up of the Yorkshire Dales National Park Authority (YDNPA). For the avoidance of doubt the Secretary of State intends to consult upon and, as necessary following that consultation, make any appropriate amendments to the membership of the YDNPA.
 - c. In terms of the two minor exceptions:
 - i. the boundary of the YDN south of Reagill which the Inspector recommended should be re-defined, should be changed in line with an amended boundary proposed by Natural England;
 - ii. the small area of land at Lowgill Farm should be omitted from the Order.
14. Once the extensions take effect, the Secretary of State's expectation is that, consistent with the duty under section 11A(1) of the NPAC 1949, the YDNPA will seek to foster the economic and social well-being of local communities within the expanded National Park and will co-operate with the relevant local authorities and other public bodies whose functions include the promotion of economic or social development within the Park. The Secretary of State expects that the YDNPA will discharge that duty in a manner which is congruent with the distinctive features of the YDNP.

Part I - The Secretary of State's detailed consideration of the proposed extensions

The statutory tests

15. The Inquiry addressed whether the two proposed extension areas met the statutory criteria and purposes of designation as a National Park set out in NPAC 1949.

16. Section 5 of NPAC 1949 provides, so far as material, as follows:

‘5 National Parks

(1) The provisions of this Part of this Act shall have effect for the purpose—

(a) of conserving and enhancing the natural beauty, wildlife and cultural heritage of the areas specified in the next following subsection; and

(b) of promoting opportunities for the understanding and enjoyment of the special qualities of those areas by the public.

(2) The said areas are those extensive tracts of country in England . . . as to which it appears to Natural England that by reason of—

(a) their natural beauty, and

(b) the opportunities they afford for open-air recreation, having regard both to their character and to their position in relation to centres of population,

it is especially desirable that the necessary measures shall be taken for the purposes mentioned in the last foregoing subsection.

(2A) Natural England may—

(a) when applying subsection (2)(a) in relation to an area, take into account its wildlife and cultural heritage; and

(b) when applying subsection (2)(b) in relation to that area, take into account the extent to which it is possible to promote opportunities for the understanding and enjoyment of its special qualities by the public.’

17. The reference to “conserving and enhancing the natural beauty of areas” in s.5(1)(a) is to be construed as including references to the preservation or conservation of its flora, fauna and geological and geophysical features (see s.114(2) of NPAC 1949).

18. As regards the definition of “natural beauty” in section 5(2)(a) of NPAC 1949, section 99 of NERC 2006 provides as follows:

‘99 Natural beauty in the countryside

The fact that an area in England or Wales consists of or includes—

(a) land used for agriculture or woodlands,

(b) land used as a park, or

(c) any other area whose flora, fauna or physiographical features are partly the product of human intervention in the landscape,

does not prevent it from being treated, for the purposes of any enactment (whenever passed), as being an area of natural beauty (or of outstanding natural beauty).’

S5(2)(a)&(b) criteria: natural beauty and open air recreation

19. At paragraphs 2.159-2.168 of his Report the Inspector sets out his conclusions on these criteria in respect of the YDN. The Secretary of State agrees with the Inspector’s conclusions and reasoning.

20. At paragraphs 2.247-2.260 of his Report the Inspector sets out his conclusions on these criteria in respect of the YDW. The Secretary of State agrees with the Inspector's conclusions and reasoning.

Especially desirable

21. At paragraphs 3.253-3.271 of his Report the Inspector sets out his conclusions on whether it is "especially desirable" that the necessary measures are taken for the purposes specified in s5(1) of the 1949 Act i.e. the statutory National Park purposes. In those paragraphs the Inspector addresses why it would be especially desirable for the extensions to be made to both the YDNP and the LDNP.
22. In particular the Inspector makes the following key points in support of his conclusion that it is "especially desirable" that the necessary measures are taken for the purposes specified in s5(1) of the 1949 Act i.e. the statutory National Park purposes:
- a. In contrast to local authorities (which were finding it difficult to maintain consistent contributions to the s5(1) purposes) the two National Park Authorities (NPAs) were "*far more likely to be able to deliver strategic 'landscape-led', 'multi-purpose', and 'joined-up' long-term programmes and initiatives of the type likely to assist the necessary measures across all aspects of the two NP purposes*", thereby ensuring a "*clearer focus*" on those purposes (IR 3.258-3.259).
 - b. Whilst the estates which formed a large part of the YDW area showed a high level of consistent stewardship, designation would "*bring wider opportunities... to key into NPA projects and initiatives aimed at furthering and balancing the multiple benefits required to achieve NP purposes as a whole*". Taking YDW and YDN together, designation would offer the NPA an important opportunity to take a strategic view of the very high and unspoiled qualities of the Lune Valley as a whole (IR 3.266-3.268).
 - c. The special qualities of the Orton Fells (in the YDN), with a rich concentration of natural beauty, wildlife and cultural heritage intermixed with opportunities for open-air recreation, need to be preserved and enhanced and promoted for an appropriate level of public understanding and enjoyment (IR 3.270).
23. The Inspector also concluded that there were various misconceptions about the effects of designation and the ways in which NPAs function (IR 3.260-3.265). These included a misconception that NPAs play an actively interventionist role in land management (IR 3.260). Other misconceptions were that increased bureaucracy would result from designation and that NPAs engage in aggressive promotion of 'tourism' (IR 3.261-3.262).
24. On the question of whether it is "especially desirable" that the necessary measures are taken for the purposes mentioned in sub-section (1) of section 5 (see sub-section 5(2)), the Secretary of State agrees with the conclusions and reasoning given by the Inspector at paragraphs 3.253-3.271 of his Report.
25. In addition the Secretary of State considers that the 'especially desirable' test is also satisfied in respect of the YDN and YDW, for the following additional reasons:
- a. YDN as a whole is a complex area, with a high level and range of interests. An integrated NPA-style approach to its management would be especially desirable. There are a number of special qualities of the YDN area and all of

- these qualities are already echoed in the existing YDNP and chime with the kinds of measures included in the YDNP Management Plan (IR 3.148). The work undertaken by the YDNPA in relation to limestone pavements and Catchment Sensitive Farming are examples of the types of activity which would be readily transferable to the YDN area (IR3.149).
- b. In terms of the Howgills within YDN, it makes no sense for this distinct and distinctive Natural Area to be split part in and part outside the YDNP given that it is a single landscape unit with iconic skyline features. The Howgills should be treated as a single unit with one authority responsible for its countryside management (IR 3.147).
 - c. Public Rights of Way (PROWs) provide the main ways in which people enjoy the special qualities of National Parks and are crucial to the second National Park purpose (IR 3.120). NPAs have a better record of regular maintenance of PROWs (IR 3.126, 3.196).
 - d. NPAs employ staff with specialist skills relevant to NP purposes. NPAs undeniably have more available expertise to do this than the existing local authorities. In addition, the NPAs can call upon the assistance of a very large volunteer reserve which does not exist elsewhere (IR 3.81).
 - e. In terms of cultural heritage, some areas are at risk of erosion of heritage features. In YDN Eden DC has not prepared Conservation Area Character Appraisals for Maulds Meaburn, Crosby Ravensworth, and Crosby Garrett, nor for the Conservation Area covering the Settle-Carlisle Railway. This contrasts with the situation in YDNP where appraisals have been prepared for all the sections of the railway within its boundaries. There has been a loss of historic earthworks, and the character of hamlets and historic farmsteads in Eden has been damaged by development and farming practices (IR 3.113).
 - f. National policy on biodiversity, including the 2010 Natural Environment White Paper and the subsequent 2011 Biodiversity Strategy (Biodiversity 2020), stresses the importance of improving connectivity across wide areas to benefit biodiversity and wildlife. A key aspect of these policies is that greater priority should be given to achieving sites for nature that are better, more in number, larger in size and more joined-up. The extensions will achieve integrated NPA management over a wider area and assist Government's ambition to halt biodiversity loss by 2020 (IR 3.79).

Conclusion

26. In conclusion therefore, the Secretary of State is satisfied that the statutory requirements set out in section 5 of NPAC 1949 are established in respect of the YDN and YDW extension areas.

Part II - The minor exceptions

Boundary south of Reagill (YDN)

27. At 2.168 and 5.5 of the Inspector's report it is noted that Natural England accepted that some slight amendments to the boundary south of Reagill could be made in order to provide a boundary which followed more permanent features on the ground. This required some reconsideration of the short stretch of boundary between the public roads south-east of Wyebourne and west of Meaburn Hall. The Inspector therefore recommended that Natural England should carry out the necessary work to define an appropriate modification to the boundary.

28. Upon receipt of the Inspector's report the Secretary of State asked Natural England to carry out this discrete piece of work and provided the relevant paragraphs of the Inspector's report to Natural England. For the avoidance of doubt the Secretary of State communicated this information strictly in confidence only to those who needed to know the information within Natural England and was clear that no broader inferences about the Inspector's conclusions should be made.
29. Natural England have undertaken this work and proposed a new boundary which better follows the permanent features in this area, which departs only slightly from the proposed Order and does not take in any additional land over that proposed by the Order. A detailed description of the boundary is set out at **Annex 1** to this letter and a map is included at **Annex 2**.
30. The Secretary of State has considered the new boundary suggested by Natural England as set out in the detailed description and the map at Annexes 1 and 2. The Secretary of State is satisfied that the new boundary is more appropriate and therefore adopts these amendments to the boundary, in line with the recommendation by the Inspector that an appropriate modification to the boundary should be devised. The Secretary of State is content that no further consultation or opportunity for the parties to comment is required given the Inspector's recommendation and the fact that the revisions to the boundary are relatively minor.

Lowgill Farm (YDW)

31. At 2.259-2.260 and 5.6 of his report the Inspector recommends the omission of the built-up part of this farm at the boundary of the proposed extension. This is because the site does not meet the s.5(2) NPAC 1949 criteria. The Inspector records that Natural England were content not to press for it to be retained.
32. The Secretary of State accepts the Inspector's recommendation and has decided to omit this site from the extension for YDW. In line with the Inspector's recommendation, there is no need for further consultation on this issue (see 5.6 of the Inspector's report). see map at **Annex 3**.

Part III – Other Issues

Funding

33. In making the decision to confirm the Order, the Secretary of State has considered the issue of funding. In Section 4 of the Inspector's report at paragraphs 4.35-4.43 the Inspector records a number of different views about the availability of funding in the context of the proposed Orders. The Inspector correctly noted that this issue fell outside the scope of the Terms of Reference of the Inquiry, but nevertheless considered it appropriate to draw these matters to the Secretary of State's attention without making recommendations.
34. The Secretary of State is therefore fully aware of the views expressed in those paragraphs of the Inspector's report, including the view of Natural England that it would not be worth taking additional land into the two NPs without some increase in resources and that Natural England would expect some increase in funding for the two NPAs, commensurate with the increase in size and administrative complexity involved (see IR 4.40). The Secretary of State is also aware that the two NPAs expressed similar views (see IR 4.42).

35. The Secretary of State has taken into account these views. The Secretary of State considers that it is appropriate to designate the land because it satisfies the statutory tests for designation and it is not considered that the current spending constraints should affect that decision.
36. Further the Secretary of State considers that there are considerable benefits to designation which are not contingent upon an increase in funding. In particular:
- a. As recognised by the Inspector at 3.257 of his report (when setting out his conclusions on the “especially desirable” requirement), designation “is for the long term” and is not merely a short-term measure. Consequently whilst there are limitations on funding at the present time, this may not persist in the longer-term. The advantages of designation go well beyond current plans and projects and extend well into the future.
 - b. Some of the key benefits of designation and the reasons why it is especially desirable in the present circumstances are the considerable benefits which will flow from a strategic approach of the two NPAs across these areas and the integrated and knowledgeable management this will bring. As stated at IR 3.259:

“the evidence produced to the inquiry, especially in the statements of the two NPAs, shows that these bodies are far more likely to be able to deliver what have been variously described as strategic ‘landscape-led’, ‘multi-purpose’, and ‘joined-up’ long-term programmes and initiatives of the type likely to assist the necessary measures across all aspects of the two NP purposes... This is an indication of the ways in which, even in times of public sector cuts, NPAs will be better able to maintain a clearer focus on NP purposes, notwithstanding that their overall resources may be under pressure.”
 - c. Although the NPAs’ main financial resources come from the Defra core grant (79% in the YDNP), the NPAs are also very successful in gaining complementary funds from other sources including charitable organisations. Other income is raised through the NPAs’ activities. NPA spending also has a local multiplier effect (IR 3.80). In addition future Government funding decisions will take account of the planning function they will inherit from the local authorities in respect of these areas.
 - d. Designation also means the benefits of experienced and dedicated volunteer networks who are able to be called upon by NPAs to promote the objectives of NPs (as recorded, for example at IR 2.145, 3.81, 3.175, 3.205, 3.212 of the Inspector’s report).

Appropriate name for the Yorkshire Dales National Park

37. The Secretary of State is aware that there has been some discussion during the Inquiry surrounding the name of the YDNP and whether, if the extensions were to go ahead, the name should be changed. The Inspector recorded a number of views on this issue at 4.3-4.18 of his report. The Inspector correctly noted that this issue fell outside the scope of the Terms of Reference of the Inquiry, but

nevertheless considered it appropriate to draw these matters to the Secretary of State's attention without making recommendations.

38. The Secretary of State notes Natural England's view, as recorded at paragraph 4.12 of the Inspector's report, that the naming issue is a matter for the Secretary of State exercising powers under s.75 of the Environment Act 1995 ('the EA 1995'). The Secretary of State does not agree with that view; the relevant order made under the EA 1995 is an order *establishing* a National Park authority (s.63 of the EA 1995), to which the ancillary powers in s.75 apply. The Secretary of State considers that the name given will follow that of the designation and that if a name change is proposed it should be reflected in the proposed Order.
39. However, without prejudice to that primary position, the Secretary of State does not consider that there is any merit in a name change. Whilst she has taken into account the range of views expressed in the Inspector's report, there are good reasons why the name should remain unchanged.
40. In particular the Secretary of State has had regard to the fact that 11% of the YDNP is already comprised of land outside Yorkshire and that the YDNPA is already committed to localised marketing and branding to highlight individual dales' names and local heritage. For example the YDNPA considers that it would be able to reinforce the local Westmoreland identity of YDN and YDW by extending what it already does in promoting a 'sense of place' and engaging with local people about how they see themselves, including in terms of branding and identity.
41. In those circumstances the Secretary of State does not consider there is any case for a name change for the YDNP.

Strategic Importance of Major Infrastructure Corridor

42. The M6 motorway and the West Coast Mainline railway run close together in the gap between the YDNP and the LDNP. Considerable energy and communications infrastructure make use of the same corridor and/or is earmarked for doing so in the future. The extensions will impact upon a significant proportion of this gap, taking boundaries close to the M6 or railway in places.
43. During the development of the extension proposals in respect of the YDNP and the LDNP there were discussions between Natural England and the National Grid, which culminated in an agreed statement of common ground, on the basis of which the National Grid did not object to the proposed extensions (see paragraph 2.63 of the Inspector's report). A copy of that statement of common ground is attached to this letter at **Annex 4**.
44. At paragraphs 2.84-2.86 and 5.3 of his report the Inspector invites the Secretary of State to consider whether or not it is appropriate to issue some form of additional advice to the two NPAs and/or others, to reflect sub-paragraphs (a) and (b) of paragraph 7 of the statement of common ground which states as follows:

"In the light of the above and as a result of what is common ground between the parties, National Grid and Natural England recommend that the Inspector in his report expressly:-

a. recognises the importance of the area between the existing boundaries of the LDNP and the YDNP for existing national strategic infrastructure and of the prospect of future linear strategic infrastructure development there as a highly material consideration for authorities; and

b. records that as a highly material consideration, it is an issue which should be addressed in the National Park Authorities future Management Plans and Development Plans so as to recognise this national strategic importance and include appropriate provisions for the prospect of future linear strategic infrastructure development.”

45. The Secretary of State has confidence that the NPAs will act in accordance with paragraphs (a) and (b) above. In particular the Secretary of State has confidence that the YDNPA will:
- a. recognise the importance of the corridor for existing national strategic infrastructure and will view the prospect of future linear strategic infrastructure development there as a highly material consideration.
 - b. address the national strategic importance of the area in its future Management and Development Plans and include appropriate provisions for the prospect of future linear strategic infrastructure development.

Housing Affordability/“Democratic deficit” and accountability

46. In Section 4 of his report, at paragraphs 4.19-4.34, the Inspector records a number of concerns which had been expressed during the Inquiry about housing affordability. Natural England’s response to these issues is recorded at paragraphs 4.27-4.29. Further, at paragraphs 4.44-4.45 of his report, the Inspector records a number of concerns which had been expressed during the Inquiry about the possibility that the Orders would lead to a “democratic deficit” through the loss of representation by elected rather than appointed members, with a consequent loss of ownership and accountability for local people. Natural England’s response to these issues is recorded at paragraph 4.46. These were both issues which the Inspector concluded fell outside the Terms of Reference, but which he considered it was appropriate to bring to the attention of the Secretary of State without making recommendations.
47. Neither of these issues is relevant to the statutory test for designation. However, in any event, the Secretary of State does not consider that they detract from her decision to confirm the Order for the reasons set out below.
48. In terms of housing affordability and the availability and provision of affordable housing, the Secretary of State notes that house prices are already an issue within the extension areas; prices in the extension areas are already in the top quintile for Cumbria and the LDNP, higher than in the YDNP and higher than in areas which would remain outside the NPs (see IR 4.27). In addition there is no evidence to suppose that house prices would rise solely as a result of designation. In addition designation is unlikely to make it more difficult to meet the existing targets for affordable housing.

49. In terms of any “democratic deficit” or loss of accountability, the Secretary of State notes that the most recent review of National Park Governance (the Consultation on the Governance arrangements for the National Parks and the Broads 2010) sought and considered a wide range of views on these issues, and where changes were considered necessary, they have been addressed, or will be when a suitable legislative opportunity is available. The Secretary of State’s view is that local communities are well represented on the Boards of the Authorities.

Copies of this letter

50. This letter has been sent to all those who were heard at the inquiry or who have registered an interest in receiving the report, to local Members of Parliament, to the relevant Local Authorities and to other interested parties.

Best wishes,

A handwritten signature in blue ink, reading "Elizabeth Truss". The signature is written in a cursive, flowing style.

Elizabeth Truss MP
Secretary of State for the Environment, Food and Rural Affairs

ANNEX 1

Detailed description of revised boundary south of Reaqill (YDN)

From west to east, the boundary modifications follow more permanent features such as the minor roads from Castlehowe Scar to Wickerslack, tracks and a stream, before re-joining the 2012 Variation Order boundary from the stream south of Prickly Bank Wood to Mains Wood which is an easily identified track defined as a Public Right of Way (PROW). Within Mains Wood there is a very small adjustment to the boundary to move it from the post and wire fence to the adjacent track/ PROW which continues east to the minor road (however it should be noted that it is not possible to show this on the map at Annex 2). The 2012 Variation Order boundary from Mains Wood to Meaburn Hall, being a minor road, is sufficiently permanent and identifiable to not merit modification.

The modification to the boundary starts a little to the west of the area indicated in the Inspector's recommendation. This will result in a less convoluted boundary which makes more sense on the ground and as a consequence is more coherent in conjunction with the other modifications.

The modified boundary avoids the use of less permanent features such as post and wire fences and, where amendments have been made, draws back from the boundary indicated in the 2012 Variation Order. The modified boundary makes use of more permanent features that are easily identified on the ground. Only part of the stretch of boundary indicated by the Inspector, from the public roads south-east of Wyebourne and west of Meaburn Hall, has been modified. The reason for this is that the 2012 Variation Order boundary from Meaburn Hall to Mains Wood and the section west of Mains Wood to the stream to the south of Prickly Bank Wood already make use of permanent and easily identified features, these being a minor road and further west, a well-established track which is also a PROW.

Annex 2

Map showing revised boundary south of Reagill (YDN)

Annex 3

Map showing revised boundary at Lowgill Farm (YDW)

Annex 4

Statement of Common Ground between National Grid Plc and Natural England

1. This Statement of Common Ground has been prepared by Natural England and National Grid to assist the Inspector and through him the Secretary of State in their consideration of the 2012 Lake District National Park and the Yorkshire Dales National Park Variation Orders (the 2012 Orders).
2. National Grid has no objection in principle to the extension of National Parks and as a supporter of National Parks is committed to the protection and enhancement of the environment.
3. Natural England agrees that the existing National Grid infrastructure, the M6 and the West Coast mainline are of national strategic importance. Natural England also recognises that the area between the current boundaries of the Lake District National Park (LDNP) and the Yorkshire Dales National Park (YDNP) is of national strategic importance (NE/2, para 9.3) and that it provides an important location within which future north-south linear infrastructure could be located.
4. National Grid has expressed concerns in its statements to the inquiry (2440/1 and 2440/2) regarding the effect that confirmation of the 2012 Orders might have on its operations, unless appropriate safeguards are put in place to:
 - a. recognise the importance of the currently undesignated area between the existing boundaries of the LDNP and the YDNP and,
 - b. to make appropriate provision for the potential need for future strategic linear infrastructure development there.
5. National Grid currently operates infrastructure in areas within the existing National Park boundaries, in close proximity to the existing National Park boundaries and in some areas into which the 2012 Orders propose to extend the National Parks. National Grid is concerned for the reasons it gives in its statements, as to the constraints which confirmation of the 2012 Orders will place on its ability to maintain, upgrade, refurbish and reinforce its existing infrastructure as well as deliver future linear infrastructure.
6. Natural England acknowledges that there is likely to be a need for maintenance, upgrades and system reinforcements for National Grid's existing infrastructure within and between the two National Parks, but, for the reasons given in its written statements to the inquiry (NE2 and NE5), it does not accept that the effects foreseen by National Grid or the extent of them is borne out by the evidence. Natural England recognises, however, that

there is inevitably a degree of uncertainty as to the result of decisions and policies in relation to linear strategic infrastructure development in the future.

7. In the light of the above and as a result of what is common ground between the parties, National Grid and Natural England recommend that the Inspector in his report expressly:-

a. recognises the importance of the area between the existing boundaries of the LDNP and the YDNP for existing national strategic infrastructure and of the prospect of future linear strategic infrastructure development there as a highly material consideration for authorities; and

b. records that as a highly material consideration, it is an issue which should be addressed in the National Park Authorities future Management Plans and Development Plans so as to recognise this national strategic importance and include appropriate provisions for the prospect of future linear strategic infrastructure development.

8. National Grid and Natural England consider that it would be appropriate for the Inspector to include this in his report as part of his reasoning in recommending confirmation of the 2012 Orders.

9. With these safeguards in place (as set out in paragraph 7 above), National Grid will not have any objection to the confirmation of the 2012 Orders.

Signed,