

## Appendix 1: Detailed Analysis of Method and Approach Responses

Support for the approach adopted		
Theme	Representations	Natural England Commentary
Support for approach	<p><b>ANON-3WEG-5P9K-Y</b>  <i>'Can we again thank your team for taking on board the suggestions made by local people during the last consultation. We believe that this has honed your plans and taken in treasured areas.'</i></p> <p><b>BHLF-3WEG-5PYN-2</b>  <i>'As a recently retired Landscape Architect, I have some experience of Landscape assessments. As an initial evaluation, the Yorkshire Wolds Designation Project Natural Beauty Assessment follows an objective methodology, which i support, and concludes that the are[a] does have sufficient natural beauty.'</i></p> <p><b>BHLF-3WEG-5PS5-3</b>  <i>'I congratulate those responsible for the clarity of the maps and supporting documentation.'</i></p>	<p><b><u>Commentary</u></b></p> <p>Natural England welcomes the support for the consultation process of these respondents. Natural England agrees that the early engagement which included a 'call for evidence' at the start of the Natural Beauty assessment and a 'call for response' in relation to a Provisional Candidate Area for Designation (as set out on page 8 of the Natural Beauty Assessment) has provided useful information which has informed the assessment and judgements reached.</p> <p>The Natural England Guidance on assessing landscape for designation sets out the approach to be adopted and has been followed in the technical assessments for the Yorkshire Wolds. This Guidance has been tested at Public Inquiry and concluded sound by Inspectors. Natural England agrees that this is a robust and transparent approach and welcomes the support for the approach adopted.</p> <p>Natural England is pleased that the documentation and mapping provided as part of the Statutory Consultation has been clear to follow.</p>
Support for consideration of natural heritage	<p><b>BHLF-3WEG-5PSW-5 (North Yorkshire Council)</b>  <i>'Ecology Service have reviewed the Yorkshire Wolds AONB Designation Project - Natural Beauty Assessment for each of the evaluation areas along with the boundary maps provided. We welcome the inclusion of both statutory and non-statutory ecological data including information on SACs, SPAs, SSSIs, ancient woodland, priority habitats and SINCs which is set out within the 'natural heritage features' section of each evaluation area.'</i></p>	<p><b><u>Commentary</u></b></p> <p>Natural England agrees that relevant information relating to natural heritage has been incorporated into the evaluation of natural beauty and boundary setting and welcomes the support from respondent <b>ANON-3WEG-5PSW-5 (North Yorkshire Council)</b>.</p>

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	<i>We therefore consider that relevant ecological information has been used to inform the assessment and evaluation process, as the boundaries proposed are based on this data, we have no concerns relating to the principle of the designation or the boundaries proposed.'</i>	

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<b>Level of engagement</b>	<p><b>ANON-3WEG-5PCJ-8</b></p> <p><i>'I can honestly say that as a land owner in this proposed are[a] no one has consulted me , I have had to come and find you and this is a complex and layered issue with far too much documentation for people to absorb... I am really disappointed with the lack of direct consultation with the professional bodies on this. the data and evidence collecting is skewed, those running the open consultation are biased in favour and can not often see or even listen to questions or objection's to it. it not[is] not at all a true consultation process should prior decisions be made or people not be neutral and objective n[in] key posts. Stake holder engagement is far too late and the boundary has changed yet again for this version.'</i></p> <p><b>BHLF-3WEG-5PY9-D</b></p> <p><i>'The lack of any earlier direct consultation with [ANON] as a stakeholder is frustrating for us since we manage about or just over 10% of the 465km2 and would think we are therefore a</i></p>	<p><b><u>Commentary</u></b></p> <p>Natural England has followed best practice in preparing for Statutory and Public Consultation as part of the Yorkshire Wolds Designation Project. All technical assessments have been placed in the public domain, and the consultation process was open to the wider public as well as statutory consultees.</p> <p>Earlier on in the designation process, Natural England ran several early engagement activities, including a 'Call for Evidence' and a 'Call for Response'. These events were advertised via a press release, social media posts and local press articles. Details of the early engagement activities, and how they informed the findings of the technical assessments (carried out by independent qualified professionals) and the proposals for a new AONB in the Yorkshire Wolds, are set out in the Natural Beauty Assessment (p8)</p> <p>Natural England ran the Statutory and Public Consultation from October 2024 until January 2025. An Equality Impact Assessment was carried out to determine the best way to hold a consultation in the Yorkshire Wolds area.</p>

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	<i>reasonable stakeholder (if not a statutory defined stakeholder) in the designation assessment.'</i>	<p>The assessment recommended that a mixture of online and in-person engagement was carried out in order to ensure that the consultation was accessible to a wide range of people.</p> <p>The consultation was widely promoted; through local newspapers, social media, posters, radio, emails and letters, and on the dedicated Yorkshire Wolds Proposed AONB project website. Drop-in events were held in a wide range of locations, including Market Weighton, Sherburn, Hunmanby, Thixendale, Bampton &amp; Buckton, Milton, Pocklington, Millington, Drifffield and Weaverthorpe. During these drop-in sessions, stakeholders could talk to Natural England staff, view documents and ask questions. Natural England also ran a series of online webinars for those that couldn't attend drop-in events; including two specifically aimed at providing information for farmers and landowners. Details of the consultation methods are set out in detail in The Statutory Consultation Analysis Main Report, Section 2.</p> <p>A number of documents were made available to view during the consultation period, including: the technical assessment documents; the Natural England Guidance document; and a Consultation Pack containing a number of documents and maps summarising the designation process and proposals. These documents could be viewed (and/or downloaded) online, via both the Yorkshire Wolds Proposed AONB project website and via the consult.gov platform set up for the consultation. They could also be viewed in hard copy, by visiting one of a number of local libraries and council offices throughout the area. Hard copies of the Consultation Pack could also be requested to be sent in the post.</p> <p><b><u>Conclusion</u></b></p> <p>Natural England does not accept that the designation of the Yorkshire Wolds as an AONB is a foregone conclusion but, rather, is based on technical</p>

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		assessment and an evidence-based consideration of input from stakeholders throughout the early engagement, assessment and consultation process. It has resulted in the identification of an area suitable for AONB designation. Natural England ran a Statutory and Public Consultation to ensure that local stakeholders and members of the public could consider the proposals and have the opportunity to respond, so that their views can be taken into account. The approach to engagement has followed best practice.
Extent to which land was visited	<p><b>ANON-3WEG-5PCJ-8</b>  <i>'no one has knocked on by[my] door therefore was it an os mapping exercise.'</i></p> <p><b>BHLF-3WEG-5PY9-D</b>  <i>'Given that Natural England's assessors have not sought any access off public rights of way on our estate (and we assume this is the same elsewhere with the other principal landowners within this proposed designation area) it is difficult to make a conclusion that the assessments have been carried out with proper regard to all the relevant landscape characteristics and in particular the built environment outside villages (save what has a statutory scheduling or listing), but also particularly the farmed environment and farmsteads; We are curious therefore why NE might consider that the assessments you have had commissioned are satisfactory/comprehensive and therefore not open to challenge please, in particular to the farmed environment (including the extant built farmstead characteristics?'</i></p>	<p><b><u>Commentary</u></b></p> <p>The natural beauty assessment for the Yorkshire Wolds is set out in the Natural Beauty Assessment report and has included engagement and evidence gathering from stakeholders (page 8), desk-based review of a wide range of sources (pages 9-12) and extensive periods of fieldwork (page 12).</p> <p>The assessment of landscape, when in the field, is undertaken from publicly accessible locations by experienced and trained landscape assessors. Land does not need to be fully accessible in order for a designation to proceed, and large parts of many AONBs do not have public access. The process of assessing natural beauty draws on many sources of information, both written and photographic, and these are backed up by field assessment where access allows. As set out in the Natural England Guidance (para.5.3), it is not appropriate for the assessment of natural beauty to be carried out at a field-by-field level, and there is no requirement that every parcel of land must meet the technical criterion.</p> <p>Although not every parcel of land can be visited physically, site assessment does enable the visual assessment of areas which may not be physically accessible, and any sitework is further supplemented with the use of GIS and aerial photographs and mapping. The Natural England Guidance on assessing landscape for designation does not require assessors to visit all</p>

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		<p>residents and properties within an area. This does not render the assessment 'desk-based'. Natural England does not agree that a lack of access to every parcel of land invalidates the process.</p> <p>Natural England invites all stakeholders to provide any further evidence and information they feel is relevant to the process, especially where they feel something material has been missed or is incorrect. Natural England takes all of these comments into account when analysing the responses once the consultation is closed. In light of the responses, Natural England may also reconsider its judgments regarding land which does or does not meet the designation criterion and makes any relevant adjustments to the proposed areas for designation. The evolution of the proposal is a natural part of the process and one where stakeholders play a significant role.</p> <p><b><u>Conclusion</u></b></p> <p>Natural England does not agree that the evaluation of natural beauty has been desk-based, failed to take account of relevant landscape characteristics, or is incomprehensive. Natural England considers that the method by which qualifying land has been identified is open and transparent, and in line with Natural England's <i>Guidance for Assessing Landscapes for Designation as National Park or Area of Outstanding Natural Beauty in England</i>, updated June 2021.</p>
Mapping	<p><b>ANON-3WEG-5PKR-R</b></p> <p><i>'Maps do not include Designated Heritage Assets i.e Conservation Areas</i></p> <p><i>Gr 1 &amp; 2* Listed Buildings</i></p> <p><i>SAM's that influence the beauty of the area.</i></p> <p><i>all built heritage , designated or undesignated is relevant to the natural beauty of the area'</i></p>	<p><b><u>Commentary</u></b></p> <p>Designated Heritage Assets are shown on Figure 8 of the Natural Beauty Assessment and were used to inform the evaluation of the Study Area as set out in the Evaluation Area tables.</p> <p>The mapping of the extent of qualifying land for designation is based on detailed evaluation and is set out in the three technical assessment reports:</p>

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	<p><b>ANON-3WEG-5PCJ-8</b></p> <p><i>'lazy and convenient mapping rather than justified and reflective... I can not believe the size of the area which this status has been applied to.... I cant really understand how so much land can satisfy all the stringent criteria. It suggests to me people deciding have not drilled down and been specific and objective.'</i></p>	<p>Natural Beauty, Desirability, and Boundary Considerations. These detailed assessments follow the Natural England Guidance and provide a robust and transparent approach to identifying land for designation. Natural England notes that a significant number of respondents wished to see more land included in the proposed designation. This is considered to reflect the conservative approach Natural England has adopted when defining qualifying areas for designation. Natural England believes that the complex nature of the proposed boundary alignment (as indicated on the maps and described in the accompanying boundary description) reflects the high level of detail and scrutiny that was applied when considering the extent of the proposed area for designation and the alignment of the boundary.</p> <p><b><u>Conclusion</u></b></p> <p>Natural England does not agree that designated heritage assets have not been included in mapping or taken into account in the natural beauty assessment, and considers that the definition of the area for designation has been identified through careful evaluation and analysis of evidence.</p>
<b>Missed information</b>	<p><b>BHLF-3WEG-5PY9-D</b></p> <p><i>'In light of the lack in detailed character assessment undertaken off any public right of way how do the current consultation documents satisfy the test for evaluating the characterisation and spatial framework assessment tests within the Evaluation Areas covering either [ANON], or the other areas? How does the assessment methodology provide any 'consistent spatial framework across the whole area under consideration'?</i></p> <p><i>For example, there are numerous farmsteads with large modern farm buildings but these are not acknowledged (for example within (but not limited to) Evaluation Area 2). This</i></p>	<p><b><u>Commentary</u></b></p> <p><b>Lack of reference to large buildings or other inaccuracies</b></p> <p>Respondent <b>BHLF-3WEG-5PY9-D</b> criticises the assessment for its lack of reference to large modern farm buildings, but it is not clear which buildings the respondent is specifically referring to. The respondent uses EA2 as an example, again without giving specific details.</p> <p>The role that contemporary features, such as farm buildings, play in the natural beauty of the Yorkshire Wolds is considered within the technical assessments. Paragraph 5.2.6 of the Natural Beauty Assessment states: <i>'Incongruous features of many kinds can have an effect on natural beauty,</i></p>

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	<p><i>seems to be a significant omission because it not clear whether either the landscape passes the assessment test for Natural Beauty notwithstanding this form of development or simply because the assessors are not aware (or have ignored) the detailed characteristics of the built-up farms/agricultural built-up landscape. Such information is surely important both because there is an omission in this designation assessment stage and for the future because management plans for an AONB will be based upon the entry character assessments for the landscape, and therefore when NE come to discharge their future duty to 'protect and enhance' the natural landscape/AONB the basis upon which they consult and offer opinions will necessarily be flawed because there has not been a sufficiently detailed spatial analysis of the existing landscape characteristics during the designation assessment process.</i></p> <p><i>There is a reasonable chance that some future planning consultation submissions that the ANOB [AONB] body(ies) and or Natural England make, and some decisions the Local Authority make that are based on these incomplete (and in some cases out of date/erroneous (eg. the reference to the red bricked railway viaduct near North Grimston)) assessments will be open to appeal or judicial review. This is not satisfactory for any future interested party operating within or for the AONB. Essentially, it seems the Natural Beauty evaluation undertaken has not had any or any adequate regard to paragraphs 5 and 6 (including sub-paragraphs therein) of the 'Natural England Guidance on Assessing Landscapes for Designation_June21': there is arguably a fundamental flaw in the analysis, or at least to an important part of it but this undermines the validity of the</i></p>	<p><i>particularly factors such as scenic or landscape quality, tranquillity and relative wildness. The extent to which any incongruous feature affects an area will be dependent on, for example, its scale, height, distance, surrounding topography, vegetation and movement. Where incongruous features are present this is noted within the evaluation and a judgement reached as to their effect on surrounding land. Often these issues will require further scrutiny at the boundary setting stage to ensure that only land which meets the natural beauty criterion is included within a designation.'</i></p> <p>Not all large-scale farm buildings will necessarily be referenced within the technical tables for an evaluation area but, rather, they are highlighted where they are of particular relevance to judgements. For example, in EA2, Wharram Percy Farm, which comprises large scale buildings, is enveloped on three sides by shelterbelt planting. It is the shelterbelt planting which is referred to in the Natural Beauty Assessment on page 39 as it is the most visually influential element of the farm. In relation to tranquillity, it states on page 40, that '<i>There are no unsettling visual intrusions and no large-scale new development.</i>'</p> <p>Another example can be found in EA4. Page 51 of the Natural Beauty Assessment states '<i>Settlement comprises a dispersed pattern of large farmsteads established in the 18<sup>th</sup> and 19<sup>th</sup> centuries associated with the period of parliamentary enclosure. These farmsteads typically consist of substantial farm buildings that, to some extent, are absorbed into this large-scale landscape.</i>' It went on to conclude on page 55 that '<i>In the east of the area there are a number of incongruous features including wind turbines at Scramble Bank and Hunmanby Grange, <u>large farm buildings</u> and the RAF radar station at Staxton Wold, all of which detract from the natural beauty of the area.</i>'</p> <p>The Natural Beauty Assessment does make reference to large-scale farm buildings where appropriate. Natural England therefore does not agree that</p>

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	<p><i>whole assessment.</i></p> <p><i>Much of the evaluation area text for area 2 seems therefore to be a 'copy and paste' job from a desk top literature review than from observation. The assessment omits other characteristics. For example, there are extensive trackways (including ones with public access eg. South and North of Wharram le Street) which are formed from chalk and or limestone quarried locally.</i></p> <p><i>Making a link between these and the local quarries such as at either Wharram or Burdale forms, arguably, a sufficiently important/noteworthy characteristic which is intrinsic to the current formation of the manmade landscape and such omissions make future decision-making concerned with continuing the management of the landscape, to 'protect and enhance' it, bereft of potentially relevant information which might guide planning decisions on whether to encourage, allow or refuse planning applications to [continue] extracting minerals within the AONB for trackway maintenance; and this is relevant because the permitted development right to extract stone for agricultural purposes within one's landholding will probably be taken away with AONB designation so it is arguably only reasonable that matters that are important to land management/ownership rights in planning terms which NE's designation will consequently remove are relevant assessment factors in the landscape character assessment.</i></p> <p><i>Presumably, it hardly needs saying, but unless one assesses the landscape adequately before designating an AONB one is at significant risk of undermining the future management of it.'</i></p> <p><b>BHLF-3WEG-5PY9-D</b></p>	<p>the evaluation is incomplete in this regard.</p> <p>In terms of reference to extensive trackways formed from chalk and quarries in the area, Natural England considers that the chalk qualities of the landscape area articulated at page 39 of the Natural Beauty Assessment '<i>The area as a whole is unmistakably a chalk landscape, and this is reflected in its vegetation and soil, and in the white chalk exposure in any cuttings into the bedrock and in the limey colour of water runoff from the fields after heavy rain</i>'. It also references past quarries, especially in terms of their contribution to current, present day natural beauty as a result of their natural heritage (page 40). Natural England therefore does not agree that lack of reference to tracks associated with former quarries indicates a desk-based assessment, rather the description of the area against the natural beauty factors clearly demonstrates the contribution fieldwork has made to the overall evaluation and judgments.</p> <p>Should a new AONB be designated within the Yorkshire Wolds, the relevant local authorities must prepare and publish a plan which formulates their policy for the management of an area of outstanding natural beauty and for the carrying out of their functions in relation to it. Whilst the evidence gathered in the Natural Beauty Assessment would form an important part of the evidence base for a new AONB Management Plan, other aspects (such as other relevant policies, plans and strategies, the involvement and views of local stakeholders and communities, and funding opportunities) are also taken into account.</p> <p><b>Lack of reference to Estate Management</b></p> <p>Natural England agrees that Sledmere and Londesborough are mentioned on page 8 of the Desirability Report in relation to qualities of the Yorkshire Wolds proposed area for designation, and in terms of rarity and representativeness</p>

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	<p><i>'although the Natural England (NE) 'Desirability Assessment' positively notes the beauty of estate managed landscapes for example villages (particularly at Sledmere and Londesborough) which are the consequence of private land management decision making and planning, there is no mention of private land management in section 5 of the report setting out 'Current Management of the Yorkshire Wolds'. This is a significant omission since the majority of the proposed landscape for designation is privately owned and managed, and a significant proportion (if not the majority) of occupiers are involved in actions already that protect and enhance the natural beauty of the landscape, and NE will know this well.'</i></p>	<p>(page 10).</p> <p>The purpose of Section 5 of the Desirability Assessment is to set out the range of overarching partnerships and initiatives which engage in conservation work. These conservation initiatives work with landowners, be they individual farmers or large estates. The fact that estates (or indeed any landowners/farmers) are not specifically mentioned in the text does not imply that they are irrelevant or do not deliver positive environmental management on the ground. The focus of Section 5 is to focus on the broader initiatives and strategies currently operating in the area, in order to explore the extent to which designation might duplicate activity or add value.</p> <p><b><u>Conclusion</u></b></p> <p>Natural England considers that the evidence contained within the Natural Beauty Assessment, and other technical documents, provides a robust and reasonable grounds for designation. Future management should not be constrained by the evaluation process but rather informed by it.</p> <p>Natural England does not agree that a lack of reference to estates or individual landowners is a significant omission in the Desirability Assessment. Natural England fully recognises the importance of the management of the land by landowners and that the special qualities of the landscape are, in part, due to land management activity.</p>
<b>Factual errors</b>	<p><b>Viaduct at North Grimston</b></p> <p><b>BHLF-3WEG-5PY9-D</b></p> <p><i>'There is a reasonable chance that some future planning consultation submissions that the ANOB body(ies) and or Natural England make, and some decisions the Local Authority</i></p>	<p><b><u>Commentary</u></b></p> <p><b>Viaduct at North Grimston</b></p> <p>Natural England notes that respondent <b>BHLF-3WEG-5PY9-D</b> raises the issue of the railway viaduct near North Grimston which has been removed.</p>

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	<p><i>make that are based on these incomplete (and in some cases out of date/erroneous (eg. the reference to the red bricked railway viaduct near North Grimston)) assessments will be open to appeal or judicial review.'</i></p> <p><b>Planning status of Burythorpe sand pit</b></p> <p><b>BHLF-3WEG-5PYF-T</b></p> <p><i>'We were pleased to see the generally positive remarks in the consultation literature about the impact of Burythorpe sand pit (aka Kennythorpe Moor Sandpit) which is described as having a minimal impact on the surrounding landscape. One point in the literature which is mistaken is the reference to a planning application for further extraction at the site on page 41 of the Boundary Assessment. This project (which may vary from what is in the public domain) was a request for a Screening Opinion and is not yet at the planning application stage, although an application will be forthcoming in due course. We were pleased to see that Natural England do not see a project such as this to have an adverse effect on the natural beauty of the area.'</i></p>	<p>Natural England wishes to clarify that the viaduct referred to in the assessment lies just to the north of Wharram Percy. Natural England accepts that there is a drafting error in the text, as it stands, and that two separate points have become conflated. The first point is that there are views down the Settrington Beck valley towards North Grimston and the second that there are views of the viaduct as an element of approach to and arrival at Wharram Percy. Natural England apologies for any confusion caused and will ensure that the Natural Beauty Assessment is amended accordingly.</p> <p>However, Natural England does not consider this to materially alter the overall judgment that EA2 meets the Natural Beauty Criterion.</p> <p><b>Planning status of Burythorpe sand pit</b></p> <p>Natural England has reviewed the current status of the Burythorpe sand pit in light of this consultation response.</p> <p>Burythorpe Sand Quarry is an identified silica sand quarry in the Minerals and Waste Joint Plan. Paragraph 5.66 of the plan makes reference to a current permission which is valid until 2042.</p> <p>Natural England notes there is currently no new planning application associated with the site and has amended the wording on page 40 of the Boundary Assessment. This does not materially change the fact that the site is currently active and likely to remain so for the foreseeable future.</p> <p><b><u>Conclusion</u></b></p> <p>Natural England will amend the text in the Boundary Considerations Report but has not altered its judgment regarding the suitability of land for designation.</p>

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<b>Value of scrub habitat</b>	<p><b>BHLF-3WEG-5PYX-C</b></p> <p><i>'We acknowledge that bramble and scrub can pose a risk in chalk grassland habitat, however we would like to note that these features can play an important role for biodiversity in the right place. We therefore propose an amendment to the documentation acknowledging the biodiversity contribution they play, and that there is a place for them within the boundary area.'</i></p>	<p><b><u>Commentary</u></b></p> <p>Natural England agrees that scrub is a valued habitat and that a mosaic of habitats can support a broader range of species diversity. Nevertheless, Natural England is also mindful of the importance and the rarity of chalk grassland and the importance of balanced management to ensure this rare habitat is not lost as a result of lack of management and scrub invasion.</p> <p>Natural England has conducted its assessment of natural beauty with this perspective in mind. The Natural Beauty Assessment contains positive references to scrub in many places, for example page 40, 46, 53 and 66. It also refers to scrub invasion and active management which has affected areas of chalk grassland and as detailed in SSSI citations e.g. page 44 and 52.</p> <p><b><u>Conclusion</u></b></p> <p>Having reviewed all references to scrub within the Natural Beauty Assessment, Natural England does not consider its assessment of scrub is biased, and Natural England has concluded that there is no need to amend the documentation further.</p>
<b>Natural heritage being bigger, better managed and better</b>	<p><b>ANON-3WEG-5PVP-1</b></p> <p><i>'It is important the potential refresh from the new government, prioritising nature in designated spaces, is incorporated into this process'</i></p> <p><b>BHLF-3WEG-5PYX-C</b></p>	<p><b><u>Commentary</u></b></p> <p>Assessment of land for designation must be in accordance with the Natural England Guidance. The Guidance (para. 6.10), as informed by previous public inquiries in relation to designated landscapes, sets out that the use of the present tense in the wording of the legislation means that the assessment</p>

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connected	<i>'The new AONB, if and when designated, needs to be empowered to target and address [these] conservation priorities, which <b>should also be reflected in the determination of its boundary.</b>'</i>	<p>of natural beauty can only take into account the current condition of the area at the time of the natural beauty assessment. It cannot take account of either opportunities to enhance its natural beauty or potential threats against it, unless there are definite plans being delivered to restore the area within a reasonable timescale. Landscape is assessed in its current state, not future potential.</p> <p>Once designated, AONBs frequently engage in conservation and enhancement of biodiversity including habitat management and connectivity.</p> <p>However, the potential to achieve this is not a boundary consideration.</p> <p>Similarly, Natural England acknowledges that in December 2024, the Government announced an intent to grant new powers to Protected Landscapes (including AONBs) to boost nature's recovery and access to the outdoors; and that the proposed new legislation and guidance would give Protected Landscapes a clear mandate to widen the public's access to nature through strengthened purposes and making changes to improve their governance. Natural England also acknowledges that the details of these proposed amendments, and the resultant implication(s) for AONB designation, have not been confirmed; and the required legislative changes and their implementation may take some time to enact.</p> <p>It is a long-standing and accepted principle of public administration that policy and regulation evolve over time, and designation decisions must necessarily be made within the framework in force at the time. In considering the proposed designation of an area of the Yorkshire Wolds as an AONB, Natural England must comply with current legislation. Legislation covering the designation of protected landscapes has not been amended as a result of the Government's announcement and, therefore, Natural England must consider whether an area is of such outstanding natural beauty that it is desirable that</p>

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		<p>it is designated for the purpose of conserving and enhancing its natural beauty, as set out in The Countryside and Rights of Way (CROW) Act, 2000.</p> <p>The assessment methodology described in Natural England's <i>Guidance for Assessing Landscapes for Designation as National Park or Area of Outstanding Natural Beauty in England</i> (updated June 2021) has been used as the basis for the technical assessments for the proposed Yorkshire Wolds AONB designation. Natural England's technical assessment and recommendation are firmly grounded in the existing statutory framework.</p> <p><b><u>Conclusion</u></b></p> <p>In considering the proposed designation of a new AONB in the Yorkshire Wolds, Natural England must apply current legislation, including the existing framework for designation, and must consider the current natural beauty of the landscape. Natural England does not agree that future potential for prioritising nature and conservation is a valid reason for designating more land.</p>
<b>Weight given to cultural heritage</b>	<p><b>ANON-3WEG-5PN8-1 (Historic England)</b></p> <p><i>'Historic England feels that the consultation doesn't adequately consider the "archaeological, historical and cultural interest which add value to the landscape" (to quote Selman and Swanwick) in the assessment and boundary definition.... The key statement in the Natural Beauty Assessment that needs to be challenged seems to be: "This evaluation area contains a significant number of important archaeological sites. Although some earthworks are visible on the surface, most are not and therefore features such as barrows, the remains of medieval settlements and some of the dykes, although of archaeological</i></p>	<p><b><u>Commentary</u></b></p> <p>Natural England acknowledges that cultural heritage can contribute to the natural beauty of a landscape and that it is an important component of the Yorkshire Wolds landscape. Furthermore, the Natural England Guidance (Paragraph 6.3) states that:</p> <p><i>'the presence of particular wildlife or cultural heritage features can make an appreciable contribution to an area's sense of place and thereby heighten the perception of natural beauty.'</i></p> <p>And (Paragraph 2.6 3<sup>rd</sup> bullet) that:</p>

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	<p><i>interest and contributing to a sense of time-depth, make only a localised or minimal contribution to natural beauty.” This allows cultural interest to be outweighed by the perceived lack of scenic qualities in the broader landscape setting.’</i></p> <p><b>ANON-3WEG-5PKR-R</b>  <i>‘Whilst ‘cultural heritage’ is mentioned ( P15 para 1) its value in relation to the proposed ANOB is not expanded in terms of traditions/ skills/ Routes/ former industries that are an integral part of the natural environment....The Built Heritage of the area receives little attention viz my comments in QC2 &amp; C7 . Many of the buildings come out of the landscape including chalk and brick buildings... Limited reference to past industries of the area(P14 ‘Vestiges of the past’) and how they have affected the landscape, some of which now provide new and valuable habitats.....The Natural Environment and the Built Environment are intertwined but the document takes little account of this .Even Historic England is missing from those with responsibilities in the area ( P20 para 1)’</i></p> <p><b>ANON-3WEG-5PZY-E</b>  <i>‘this landscape is of cultural significance, this appears to have been overlooked and areas that Hockney painted have been completely ignored..... Anything other than designating the area traditionally known as the Yorkshire Wolds, particularly sections with the East Riding of Yorkshire is simply unacceptable.’</i></p> <p><b>ANON-3WEG-5PKU-U</b>  <i>‘I haven’t seen reference to Historic England’s ‘Food For</i></p>	<p><i>‘Land is not prevented from being treated as of natural beauty by the fact that it is used for agriculture, or woodlands, or as a park, or that its physiographical features are partly the product of human intervention in the landscape (s.99 Natural Environment and Rural Communities Act 2006)’</i></p> <p>Table 3 (page13) of the Guidance clarifies what this should include, namely <i>‘The influence of cultural heritage on the perception of natural beauty of the area and the degree to which associations with particular traditions, people, artists, writers or events in history contribute to such perception.’</i></p> <p>In Appendix 1 of the Guidance, examples of what might be taken into account when considering cultural heritage are provided and include archaeology with example indicators including:</p> <ul style="list-style-type: none"> <li>• Presence of settlements, buildings or other structures that make a particular contribution to perceptions of natural beauty.</li> <li>• Presence of visible archaeological remains, parkland or designed landscapes that provide striking features in the landscape contributing to perceptions of natural beauty.</li> </ul> <p>Natural England notes that respondent <b>ANON-3WEG-5PN8-1 (Historic England)</b> refers specifically to Evaluation Area 5 (page 61) of the Natural Beauty Assessment which relates to the Great Wold Valley, and this refers primarily to buried archaeological sites. However, a number of other cultural heritage features in this landscape are noted as making a significant contribution to natural beauty, including: the settlement pattern; place name evidence; associated field enclosure patterns; upstanding earthworks adjacent to existing settlement reflecting the evolution of the villages; and Scheduled Monuments which have a particular visual presence in the landscape, including Duggleby Howe, Wold Newton Mound and Willy Howe. Reference is also made to vernacular architecture and the intermittent flow of the Gypsy Race in local folklore. Natural England therefore does not agree</p>

Concerns regarding the approach adopted		
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	<i>Thought' Research Strategy report, have I missed it?'</i>	<p>that consideration of archaeological, historical and cultural interest has been inadequate.</p> <p>In terms of comments made by respondent <b>ANON-3WEG-5PKR-R</b>: as indicated above and for other Evaluation Areas, Natural England has considered a range of different sources of information relating to cultural heritage and has, in each Evaluation Area, considered its contribution to natural beauty. Local vernacular styles and building materials, for example, were commented on in Evaluation Areas 1, 3 and 4 (pages 37,46 and 52 respectively) of the Natural Beauty Assessment. Reference to past industries and quarrying providing new habitats was also referred to in the Natural Beauty Assessment; for example, reference to chalk grassland habitats in former quarries in Evaluation Area 2 (page 40).</p> <p>Natural England acknowledges that not all locations where Hockney painted the landscape have been included in the proposed area for designation. This is because the assessment of natural beauty is not predicated on where artists have captured the landscape, but rather on whether the landscape meets the natural beauty criterion, based on the weight of evidence taking into account all natural beauty factors.</p> <p>Natural England can confirm that it was aware of the Food for Thought research strategy during the Natural Beauty evaluation. The Food for Thought project was a conversation project/initiative about the past and the future investigation of the Yorkshire Wolds; its aim was to find out what connects the farmers of today with their prehistoric and medieval ancestors. It resulted in artworks prepared by local people who were inspired by an archaeological dig at Hanging Grimston. This study assisted Natural England in its awareness of how local communities connect to archaeology within their communities but has not been a determining factor in the assessment of natural beauty. It, nevertheless, raises valuable insight into how a future</p>

Concerns regarding the approach adopted		
Theme	Representations	Natural England Commentary
		<p>AONB may support local communities further their engagement with local heritage.</p> <p><b><u>Conclusion</u></b></p> <p>Natural England is of the view that a wide range of cultural heritage influences have been taken into account during the Natural Beauty Assessment in accordance with Natural England Guidance.</p>
<b>Landscape quality – effect of low-voltage transmission lines</b>	<p><b>ANON-3WEG-5PVH-S</b></p> <p><i>‘Comment is made in your boundary assessment regarding the visibility of low-voltage transmission lines over parts of the Wolds. I believe this is incorrect for two reasons:</i></p> <p><i>Firstly, the development of renewable energy sources and need for supporting infrastructure mean that electricity transmission is vital to the future energy security and economic prosperity of the United Kingdom, and should not be held to be detrimental in an assessment such as this.</i></p> <p><i>Secondly, the wooden low-voltage transmission used over the Wolds area is remarkably sensitive to the landscape compared to the steel bulk of high-voltage pylons. This sensitivity and careful landscape stewardship should be recognised and rewarded, not penalised.’</i></p>	<p><b><u>Commentary</u></b></p> <p>Natural England has undertaken an evaluation of the Yorkshire Wolds landscape for designation in accordance with Natural England Guidance. At the boundary assessment stage, care is taken to draw the boundary in accordance with the Boundary Setting factors set out in Appendix 4 of the Guidance.</p> <p>It is not the purpose of the assessment to make a judgment on whether high-voltage pylons are better or worse than low-voltage pylons but, rather, to consider if and where these built structures may affect natural beauty, and where best to draw a boundary line. This becomes more significant in areas of landscape which are transitional, where landscape condition and scenic quality may be declining.</p> <p><b><u>Conclusion</u></b></p> <p>Natural England has undertaken an evaluation of the Yorkshire Wolds for designation in accordance with the Natural England Guidance and is content that the assessment takes into account the effect of low and high voltage transmission lines where it has a bearing on natural beauty and the definition of a boundary.</p>

Concerns regarding the approach adopted		
Theme	Representations	Natural England Commentary
Relative nature of tranquillity and wildness	<p><b>ANON-3WEG-5PCJ-8</b></p> <p><i>'Quite a lot of land included including my farm is an arable landscape they is absolutely not classified as 'relative wilderness' and this need full reconsideration. Small little hill sheep farm stead are quite different to the industrial scale farm yards and storage spaces required to support the level of food production here in East Yorkshire.'</i></p>	<p><b><u>Commentary</u></b></p> <p>Appendix 1 of the Natural England Guidance sets out the sub-factors relevant to considering relative wildness. These include a sense of remoteness, a relative lack of human influence, a sense of openness and exposure, a sense of enclosure and isolation and a sense of the passing of time and a return to nature. Examples include:</p> <ul style="list-style-type: none"> <li>• Relatively few roads or other transport routes</li> <li>• Distant from or perceived as distant from significant habitation</li> <li>• Extensive areas of semi-natural vegetation</li> <li>• Uninterrupted tracts of land with few built features and few overt industrial or urban influences</li> <li>• Open, exposed to the elements and expansive in character</li> <li>• Sense of enclosure provided by (e.g.) woodland or landform that offers a feeling of isolation</li> <li>• A sense of or apparent absence of active human intervention.</li> </ul> <p>Natural England agrees that large swathes of the Yorkshire Wolds is farmed and that there are extensive areas of arable cultivation. Nevertheless, the large scale of the landscape, few major roads and limited settlement means that this landscape often feels empty and remote. Whilst the landscape may not be characterised as comprising extensive areas of semi-natural vegetation, it is nonetheless regarded as expansive, with many areas having few built features. This is consistent with the description of the area in landscape character assessments.</p> <p>Paragraph 6.3 of the Natural England Guidance states that: 'In England it is widely accepted that the beauty of all our most cherished landscapes is in part due to human intervention such as agriculture and forestry. It has long been the practice to include such factors in the assessment of natural beauty.'</p>

Concerns regarding the approach adopted		
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		<p>This is now clarified in statute, and in the case of both AONBs and National Parks land is not prevented from being treated as being of natural beauty by the fact that it is used for agriculture, or woodlands, or as a park, or that its physiographical features are partly the product of human intervention in the landscape (s.99 of the NERC Act).</p> <p>Furthermore, the responses received during the Statutory Consultation, as to why the landscape should be designated as an AONB, frequently referenced the tranquillity and remoteness of the area as key qualities (refer to Appendix 3 of this Consultation Analysis Report).</p> <p>An area may have outstanding natural beauty for a range of reasons and as stated in the Guidance; not all factors or sub-factors contributing to natural beauty have to be present in all places. Different parts of a designation can satisfy the natural beauty criterion for different reasons, provided that overall, the area is of sufficient natural beauty. In line with many lowland AONBs elsewhere, the fact that some areas do not have as strong a sense of remoteness or wildness as others does not preclude them from designation.</p> <p><b><u>Conclusion</u></b></p> <p>Natural England does not agree that the use of land for arable cultivation prevents an area from expressing relative wildness. This is because relative wildness is also a product of perceptions related to openness, exposure, scale and distance from significant habitation or overt built features. In the case of the Yorkshire Wolds, there are significant areas where perception of remoteness and lack of built features are keenly felt, and where this is not the case there is nonetheless a weight of evidence associated with other natural beauty factors which supports designation overall.</p>

Concerns regarding the approach adopted		
Theme	Representations	Natural England Commentary
Lack of information on benefits of designation	<p><b>ANON-3WEG-5PCH-6</b>  <i>'It is our view that the proposal/consultation is flawed as it does not state what it meant for, or the consequences for those who lived in the proposed area.'</i></p> <p><b>ANON-3WEG-5P6W-8</b>  <i>'The emphasis of the consultation and supporting information seems to be based on which areas should or should not be included (maps). Supporting information outlines the process, criteria and selections but there are only a small number of bullet points (some repeating themselves) near the end of the booklet detailing value/advantages. Therefore the assessment presented is heavy on process, form, definition etc. but the justification (yes/no) is not considered in any great depth.</i></p> <p><i>There is no clear justification for the need of an AONB in terms of its value to the landscape, farming, businesses, infrastructure and residents. As a resident it is unclear why we would support adding a new level of bureaucracy and restrictions (however "minor") when the answers to will it offer increased landscape protection, environmental benefits, investment, infrastructure etc. are not defined and as Natural England representatives suggested not likely.</i></p> <p><i>Full impact assessment. Detailed justification with supporting examples from other AONBs. What advantages will there be e.g. how will landscapes be protected, what advantages will there be to residents, what advantages will there be to farming/businesses, how will the environment be enhanced, what is the effect of becoming an AONB going to have on visitor numbers, demand on local services/infrastructure etc.</i></p>	<p><b><u>Commentary</u></b></p> <p>Natural England Guidance makes it clear that where land qualifies for designation, Natural England designation does not follow automatically. The legislation requires that Natural England must also consider that it is desirable to designate an area in order to conserve and enhance its natural beauty.</p> <p>In addressing desirability, the Natural England Guidance sets out a series of questions which can usefully be posed. These are:</p> <ul style="list-style-type: none"> <li>• Is there an 'extensive tract' that satisfies the National Park technical criteria, or an 'area' which satisfies the AONB technical criterion?</li> <li>• Is the area of such <b>national significance</b> that National Park or AONB <b>purposes</b> should apply to it?</li> <li>• What are the issues affecting the area's <b>special qualities</b> and understanding and enjoyment and how would designation affect them?</li> <li>• Can National Park or AONB purposes be best pursued through the management <b>mechanisms, powers and duties</b> which come with National Park or AONB designation?</li> <li>• Are there <b>other relevant factors</b> which tend to suggest whether it is or is not desirable to designate the area?</li> </ul> <p>In answering these last two questions, the Desirability Assessment (May 2024) sets out on pages 38-44 the effects of designating the Yorkshire Wolds as AONB. This covers funding, additional resources and integrated management, all of which can bring positive influence to the landscape, farming, and businesses in the area. Matters relating to infrastructure and services for residents would remain the responsibility of the Local Planning Authorities.</p>

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	<p><i>Details of any possible additional funding and how it can/will be spent. As an example if new funding is available but it will be used to take on new employees/roles or used by local councils for admin. then it is of little benefit to the AONB itself. We would also want projected new funding over coming years particularly given the current environment of reduced funding to National Parks and protected landscapes etc.'</i></p>	<p>The Desirability Report also provides examples from other AONBs including the Howardian Hills and Lincolnshire Wolds (pages 25-37).</p> <p>Natural England recognises that the Consultation Documents prepared for the Statutory Consultation are a summary of the findings of the technical assessment and as a result do not contain detailed information. Nevertheless, this more detailed information was made available in the technical reports which formed part of the available consultation evidence.</p> <p>Core funding for AONBs comes through Defra and the constituent local authorities. The funding formula set by Defra has historically been based on the size of the AONB and the degree of complexity of its governance arrangements. Deployment and use of funds is rigorously controlled and transparent and a new AONB must fulfil its purpose of conserving and enhancing the natural beauty of the designated area. Additional funding will not be taken for administrative tasks alone – AONBs are held to account to deliver their key objectives.</p> <p>Questions of funding and resources are relevant to considerations of the desirability of designation so far as they impact directly on the statutory AONB purpose to further the conservation and enhancement of natural beauty within the area proposed for designation. Areas designated as AONB can expect to have additional resource available to them compared to that generally available in the wider countryside.</p> <p><b><u>Conclusion</u></b></p> <p>Natural England does not agree that there is a lack of information on the implications of designation.</p>

Concerns regarding the approach adopted		
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		<p>In discharging its responsibilities under the CRoW Act, Natural England does not have the discretion to consider whether the benefits to the area are greater than the costs of the designation; and comments relating to issues such as potential benefits to residents, or how additional funding will be spent, are not relevant to Natural England's consideration of the desirability of designation.</p> <p>Further commentary on the implications of designation on specific aspects such as the rural economy, agriculture, planning, nature conservation, etc., is set out in Appendix 2: Desirability Analysis.</p>
<b>Foregone conclusion and bias</b>	<p><b>ANON-3WEG-5P6W-8</b></p> <p><i>'I considered not responding to this consultation; I have also heard a number of others locally saying they will not. The reason for this is that all indicators suggest this is a "done deal" and the consultation is just a tick box exercise with the exception of defining which areas are in or out. Please see my earlier comments regarding the poor level of discussion/information re justifying the value of an AONB.'</i></p>	<p><b><u>Commentary</u></b></p> <p>Natural England does not accept that the designation of the Yorkshire Wolds as an AONB is a "done deal" but, rather, considers that it is based on robust technical assessment and input from stakeholders.</p> <p>Natural England has undertaken an evaluation of the Yorkshire Wolds landscape for designation in accordance with the Natural England Guidance and has followed best practice in preparing for a Statutory and Public Consultation as part of the Yorkshire Wolds Designation Project. The Guidance has been tested at Public Inquiry and concluded sound by Inspectors.</p> <p>Natural England has invited consultees, stakeholders, and members of the public to provide any evidence or information they feel is relevant to the process at several points during the evaluation process. Natural England</p>

Concerns regarding the approach adopted		
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		<p>considers all of this information and, in light of some responses, reconsiders its judgements regarding: whether or not land meets the designation criterion; the desirability of designation; and/or the alignment of the proposed boundary. Natural England considers that the evolution of the proposal is a natural part of the process and one where stakeholders play a significant role.</p> <p>As a result of evidence submitted during the Statutory and Public Consultation, Natural England has undertaken further site visits and has revised the Natural Beauty Assessment, resulting in amendments to the proposed boundary, as detailed in Section 7.5 of the main body of the <i>Report on the 2024 Consultation</i>.</p> <p>Natural England is therefore confident that the results of the Yorkshire Wolds technical assessments reflect the findings of a rigorous and transparent approach.</p> <p><b><u>Conclusion</u></b></p> <p>Natural England remains of the view that the methods used were robust, transparent and consistent with the Natural England Guidance, and that views and evidence supplied by consultees, stakeholders and members of the public have been considered as part of the designation process.</p> <p>Natural England does not agree that the proposed area for designation is a foregone conclusion. Following the completion of the Consultation Response Analysis, the technical assessments and proposals will be updated in response to evidence received. A decision will then be required by the Natural England Board to proceed or not proceed with the proposals. If the decision is to proceed then the amended proposal will be made available to</p>

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		stakeholders and the general public to consider, as part of a statutory Notice Period. Representations (responses) received during the Notice Period will be taken account of and, if warranted, the proposals updated in response to evidence submitted. Natural England will then make (sign and seal) an Order and submit it to the Secretary of State for consideration. It is the Secretary of State who makes the final decision, and they may decide to call a Public Inquiry to help them reach that decision.
<b>Insufficient consideration of farming, economy, employment and policy</b>	<b>ANON-3WEG-5PCJ-8</b> <i>'Are you aware and have complete data sets from varying sources on agriculture, the current and future? Are you aware of DEFRA policies and environmental issues and thinking, red tractor, the impact of the IHT and loss of APR - are you aware of renewable energy opportunities we require ?'</i>	<p><b><u>Commentary</u></b></p> <p>Natural England understand that there are a number of policies and legislation that affect farming and agriculture, and that the Government is currently in the process of making changes to many of these. The extent to which designation may impact on farming is considered at the desirability stage of the assessment.</p> <p>Commentary on the implications of designation on specific aspects such as the rural economy, agriculture, planning, nature conservation, etc., is set out in Appendix 2: Desirability Analysis.</p> <p><b><u>Conclusion</u></b></p> <p>Natural England has undertaken an evaluation of the Yorkshire Wolds for designation in accordance with the Natural England Guidance. Natural England Guidance (para 1.3.2) is clear that <i>'the more directly or substantially a factor bears upon the achievement of the AONB purpose, the more weight Natural England will give it in the decision whether or not it is desirable to designate.'</i></p> <p>Questions of impacts or benefits on farming, economy, employment and policy are relevant to considerations of the desirability of designation so far as they impact directly on the statutory AONB purpose to further the</p>

Concerns regarding the approach adopted		
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		conservation and enhancement of natural beauty within the area proposed for designation. Natural England is content that the assessment has given due consideration to the desirability of designation and the implications on agriculture and land management in so far as it is relevant to the purpose of designation.
Was an SEA carried out?	<p><b>BHLF-3WEG-5PY9-D</b></p> <p><i>'Paragraph 1.3 of the document [NE Guidance] says, 1.3. Prior to the commencement of any designation project, screening against current regulatory requirements such as Impact Assessment and Strategic Environmental Assessment (SEA) should be undertaken. As a general rule, evaluation projects for landscape designation are likely to fall Outside the remit of such assessments but having a clear screening decision is important to demonstrate that such requirements have been considered, if challenged later during the process.</i></p> <p><i>Please can you share the SEA if there was one for the Wolds designation project?'</i></p>	<p><b><u>Commentary</u></b></p> <p>As noted by the respondent, Natural England Guidance states (paragraph 1.3) <i>'Prior to the commencement of any designation project, screening against current regulatory requirements such as Impact Assessment and Strategic Environmental Assessment (SEA) should be undertaken. As a general rule, evaluation projects for landscape designation are likely to fall outside the remit of such assessments but having a clear screening decision is important to demonstrate that such requirements have been considered, if challenged later during the process.'</i></p> <p>A decision regarding the application of Strategic Environmental Assessment (SEA) was reached on 14<sup>th</sup> December 2021. Questions contained in Figure 2 "Application of the SEA Directive to plans and programmes" of the ODPM/ CLG document: A Practical Guide to the Strategic Environmental Assessment Directive were considered. Responding to these questions led to the conclusion that the Directive does not require SEA for the Yorkshire Wolds Landscape Designation Project. This conclusion was endorsed by David Harrison, solicitor, Natural England Legal Team, and confirmed by Caroline Cotterell, Programme Director Resilient Landscapes and Seas, Natural England.</p>

Concerns regarding the approach adopted		
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		<p><b><u>Conclusion</u></b></p> <p>Natural England considered an SEA as part of the Yorkshire Wolds Designation process and best practice, and concluded that it is not required.</p>
Request to pause designation process while new legislation is approved for National Landscapes in terms of nature recovery	<p><b>ANON-3WEG-5PK6-V, ANON-3WEG-5PKG-D, ANON-3WEG-5PV9-A, ANON-3WEG-5PV8-9, ANON-3WEG-5PVA-J, ANON-3WEG-5PVZ-B, ANON-3WEG-5PVB-K</b></p> <p><i>‘The technical assessment in relation to desirability is unable to confirm the likely impact of new DEFRA AONB regulations on the area designated as the regulations are currently being drafted. It is therefore, undesirable and arguable reckless to designate in absence of impactful regulation detail.’</i></p> <p><b>BHLF-3WEG-5PYX-C</b></p> <p><i>‘...we were delighted to see Defra announce, on 16th December, a new commitment from Government to develop new legislation to strengthen Protected Landscape’s mandate to recover nature by reforming their purposes and governance. Although no clear timetable has been set for this legislative reform, we strongly recommend that the designation process for the proposed Yorkshire Wolds AONB be paused until the new legislation is passed and the factors influencing the designation be reconsidered in light of the revised legal underpinning...</i></p> <p><i>Pausing the designation process would provide a unique opportunity to develop an exemplar new Area of Outstanding Natural Beauty for the UK – one which is set up for success</i></p>	<p><b><u>Commentary</u></b></p> <p>Natural England acknowledges that in December 2024, the Government announced an intent to grant new powers to Protected Landscapes (including AONBs) to boost nature’s recovery and access to the outdoors; and that the proposed new legislation and guidance would give Protected Landscapes a clear mandate to widen the public’s access to nature through strengthened purposes and making changes to improve their governance. Natural England also acknowledges that the details of these proposed amendments, and the resultant implication(s) for AONBs, have not been confirmed; and the required legislative changes and their implementation may take some time to enact.</p> <p>It is a long-standing and accepted principle of public administration that policy and regulation evolve over time, and designation decisions must necessarily be made within the framework in force at the time. In considering the proposed designation of an area of the Yorkshire Wolds as an AONB, Natural England must comply with current legislation. Legislation covering the designation of protected landscapes has not been amended as a result of the Government’s announcement and, therefore, Natural England must consider whether an area is of such outstanding natural beauty that it is desirable that it is designated for the purpose of conserving and enhancing its natural beauty, as set out in the current version of The Countryside and Rights of Way (CRoW) Act, 2000.</p> <p>Natural England’s technical assessment and recommendation are firmly</p>

Concerns regarding the approach adopted		
Theme	Representations	Natural England Commentary
	<i>from the start – underpinned by new legislation and an effective governance model which delivers for people, landscape, nature and the climate.'</i>	<p>grounded in the existing statutory framework. The desirability test, as defined in law, does not require certainty over the content of future regulations, but rather an assessment of whether designation would be an appropriate and effective means of securing the area's natural beauty for the future.</p> <p><b><u>Conclusion</u></b></p> <p>Natural England therefore does not agree that there should be a delay in the designation process in light of a possible change to legislation, for which there is currently no timetable.</p> <p>Natural England, in exercising its duty to designate new areas as AONB, must refer to current legislation at the time of assessment and designation. Natural England considers that a new AONB in the Yorkshire Wolds, like other protected landscapes, could deliver for people, landscape and the climate as part of meeting its purposes of conserving and enhancing natural beauty.</p>
<b>Waste of taxpayers' money on the designation project</b>	<p><b>ANON-3WEG-5P7P-2</b> <i>'There is no justification for wasting scarce public money on this project.'</i></p> <p><b>ANON-3WEG-5P9W-B</b> <i>'This whole project is an unnecessary waste of time and resources'</i></p> <p><b>ANON-3WEG-5PKB-8</b> <i>'I realise that there has already been considerable investment, both financially and of time spent but I cannot see the value for</i></p>	<p><b><u>Commentary</u></b></p> <p>Natural England recognises that a number of respondents have concerns about the funding of the designation project.</p> <p>The proposal to designate a new AONB in the Yorkshire Wolds has arisen in response to recommendations set out in a major independent review of England's protected landscapes (the Landscapes Review, September 2019) and a written ministerial statement by Secretary of State, George Eustice (Defra) in June 2021, announcing that Natural England would 'be taking forward the government's commitment to designate additional protected landscapes'.</p>

Concerns regarding the approach adopted		
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	<p><i>money in pursuing this further.'</i></p> <p><b>BHLF-3WEG-5P2C-G</b></p> <p><i>'if Natural England has surplus finance or spare staff, why not use such resources to solve existing problems elsewhere, where there are identified problems and a need for intervention? In contrast, if Natural England does not have spare resources, why is it looking to expand its area of remit and control?'</i></p>	<p><b><u>Conclusion</u></b></p> <p>Funding for the designation projects has come from central government through Defra, reflecting the past and current government's commitment to protecting more of the UK's land and sea for nature.</p>