1. National Parks are a key mechanism the Government uses to protect our most important and treasured UK landscapes. Covering nearly 10% of the country, containing some of our most memorable landscapes, National Parks are national treasures at the heart of our national identity. The special qualities that can be found in these landscapes underpin the economic activities—from traditional upland farming to tourism, food and other businesses—that thrive in our National Parks. Conserving and enhancing these precious areas, for the benefit of current and future generations, is a vital role of the National Park Authorities.

Improving Road Signage to National Parks from the Strategic Road Network

2. The two Scottish National Parks, Cairngorms and Loch Lomond and the Trossachs, have an excellent working relationship with Transport Scotland and have been able to construct large stone threshold signs on the trunk road network verges running through the Parks. There is also a full suite of advance directional brown tourism signs on the M74 and M8 directing drivers to different parts of the Park and the new M74 link included National Park signs automatically, without the National Park Authorities having to ask. In addition, in Scotland there is good signage of the National Parks at all railway stations and most bus stops.

3. In England we have previously raised with the Department of Transport and Highways England our aspiration for National Parks to be signed on the strategic roads network. For example,
   - Following lengthy discussions, the then Highways Agency agreed to place four markers on the M27, A31 and A36 to make the boundary of the New Forest National Park. The four markers, made out of polycarbonate and supported by a Chevroflex system, cost almost as much as the other 56 (wooden) markers added together. They are each located where the boundary of the national park crosses the roads. The Highways Agency agreed to replace any that are damaged or broken at their cost, although no agreement is in place about verge cutting and so at one location the marker is swamped by grass.
   - In December 2016 the Chief Executives of the Lake District National Park and the Yorkshire Dales National Park jointly wrote to Highways England to ask about the placing of National Park boundary markers along a section of the M6. The response stated that “the boundary of a geographical area such as a National Park, is not permitted on a road traffic sign. That said, I am happy to consider your request…”. Officers from the Yorkshire Dales National Park and Lake District National Park Authorities met with representatives from Highways England very recently about this topic. It was a generally useful meeting, both in terms of Boundary Markers and signage from Motorways, although we remain concerned that the current guidance from the Department for Transport seems to hamper the scope for responding positively and making a real impact in England.
   - In other places, National Parks do not have strategic roads running through their boundary, for example the Peak District National Park. Such National Parks are largely invisible to the visitor from the strategic roads network.

4. Our request is for a more consistent approach to signing our most iconic countryside brands, the National Parks, more regularly and more consistently across the Strategic Roads Network in England.

**Recommendation**

We would value clear leadership and will from the Department for Transport to support our relatively simple ask, given what has been achieved in Scotland, that where the strategic road network goes nearby, beside or through a National Park this is automatically recognised by Highways England on
their signage as a National Park, rather than being undertaken on request only basis and so in a piecemeal way.

5. The Department for Transport Regulations control signing and boundary markers on the road network. Highways England and English Highway Authorities refer to these Regulations when agreeing to signs or boundary markers http://www.legislation.gov.uk/uksi/2016/362/pdfs/uksi_20160362_en.pdf

6. Anything that does not conform to these Regulations and have the appropriate paperwork would be deemed an obstruction in the highway.

7. The Regulations recognise several types of signs and boundary markers, and it is suggested that National Parks should be recognised in relation to all three types, to allow flexibility in signing National Parks according to individual circumstances.

Administrative Boundary markers

8. Markers can be placed at boundaries of administrative areas, administrative areas for the purposes of the Regulations defined by Schedule 1 Regulation 2:

   (a) United Kingdom;
   (b) England;
   (c) Scotland;
   (d) Wales;
   (e) a county or district in England for the purposes of the Local Government Act 1972(b);
   (f) a county or county borough in Wales for the purposes of the Local Government Act 1972;
   (g) a local government area for the purposes of the Local Government etc. (Scotland) Act 1994(c);
   (h) a London Borough;
   (i) Greater London;
   (j) the City of London;
   (k) the Isles of Scilly

9. Significantly this list excludes National Parks, it has been suggested this is an oversight in the drafting process, as National Parks are administrative areas and are included in the Local Government Act 1972. While it has been common practice for boundary markers to mark the entry of National Parks, it is suggested most predate the Regulations. There is not a consistent approach across the country. This is shown by the fact that the New Forest National Park has boundary markers on motorways and trunk roads, yet elsewhere this is seen as problematic.

Recommendation

We ask that National Parks are recognised by the Department of Transport as administrative areas and included in Schedule 1 Regulation 2 of The Traffic Signs Regulations and General Directions 2016, allowing boundary markers to be placed on motorways and trunk roads.

Directional Signs and Destinations (used to convey information and direct traffic by the best route)

10. There is a DoT agreed list of Primary and Regional Destinations that can be used on directional road signs (see Local Transport Note 1/94 “The design and use of directional informative signs”). Primary destinations are largely major towns, cities, airports but also include places like Trafford
Regional destinations are places like The NORTH, The SOUTH, The NORTH WEST, The MIDLANDS, SCOTLAND. For example 'The NORTH WEST' is shown around Birmingham on the M6. Regional destinations also includes “The LAKES” which is shown on the M6 Motorway blue signs at the junction with the M55 near Preston. Then nearer (turn off at j36) it says ‘North Lakes’ straight on, ‘South Lakes, and Kendal, Barrow’.

**Recommendation**

*We ask that the Department of Transport includes National Parks in its list of Primary Route Destinations names that can be included on directional signs from the Strategic Roads Network.*

11. There is a precedent in this, in that The LAKES is already identified as a regional destination. This terminology to refer to the Lake District National Park as The LAKES is confusing to international visitors, who often associate more with National Parks, and it does not support a consistent approach to supporting major rural destinations that support a significant tourism economy.

**Recommendation**

*Therefore, we ask that in being defined as a Primary or Regional Destination, the National Parks are described as Yorkshire Dales National Park, Broads National Park, Dartmoor National Park, South Downs National Park and so on (nb the underlining is for emphasis only).*

12. This would mean National Parks were added as destinations on standard directional signs. This would be for signage from the strategic road network, rather than lots of signs inside the national park. The benefits of this approach are:

- improved road signage to road users (including visitors from overseas);
- consistent approach to signage of National Parks (it is adhoc and inconsistent at present);
- helps promote rural economy; and
- provides information on existing signs with the change being incorporated when signs are maintained/ replaced rather than leading to profusion of additional signs.


14. Interestingly, the guidance notes in relation to the Primary Route Network: - “The criteria for defining a primary destination are purposefully flexible, in order to allow the PRN to serve the whole of the country. Strict criteria based on population size or traffic levels would prevent the PRN reaching more rural corners of the country. The inclusion or exclusion of 5 individual locations is therefore a matter of DfT discretion, taking the following factors into account:

- Population – the size of the settlement, example Cheltenham
- Attraction – the amount of traffic that will come to this location, example Stansted Airport
- Nodes – locations that motorists are very likely to pass through in order to get to a final destination, example Scotch Corner
- Density – the number of primary destinations in the area, example – as Stevenage is a primary destination, neither Letchworth Garden City nor Hitchin need to be.”

**Brown signs (visitor destinations/attractions)**

15. Tourist destinations are described by Highways England as to help road users find attractions (such as a theme park or an historic building) and facilities (such as a hotel, camping ground or
picnic site). Only attractions can be signed from a motorway and brown signs may only be provided where visitors would have difficulty finding the location.

16. We sometimes hear that if National Parks had enough money, they could pay for a brown sign as with any other visitor destination. This misses the point, it shouldn’t be a question of money as to whether National Parks are signed or not. National Parks are not a commercial visitor attraction in the same way as say ‘Alton Towers’, or ‘The Beatrix Potter Experience’. They are extensive geographical areas, with a distinctive landscape that support many different types of visitor experiences and bring wide economic benefit to a range of small rural businesses. Boundary markers are particularly important in this context. A brown sign alone does not convey sufficiently the sense of a National Park.

17. It would also be helpful if we could achieve a consistent policy with the rail companies in England to have National Park signage at major train and transport hubs within National Parks. At the current time such an approach is inconsistent and really down to individual arrangements between NPAs and local transport providers. Again, a nationally consistent policy would be very powerful, especially as we are attempting to draw international tourists out of London and major cities and into our National Parks via trains and more sustainable transport options. It’s just as important to identify ‘entrance signage’ at railways stations as it is on the road network. This works effectively in other countries such as Canada.

18. The above comments relate to signage to let you know how to get to a National Park. Once inside a National Park each National Park Authority works with their respective Highways Authorities to support signage (and other road treatments) commensurate with the standard/design befitting of a National Park. This ensures that signage does not diminish the special character and qualities that make the National Park what is it and does not diminish the tourism offer for visitors, and residents, once they arrive in the National Park. Proper National Park signage need not add to the number of signs in total and could be used as an opportunity to rationalise the current rash of visitor attraction signage which has grown over time in a piecemeal manner.

Farm support post leaving the EU

19. As National Park Authorities have a depth of landscape knowledge; a clear role as expert custodians with an oversight of the whole place and for the public good; and benefit from the collective strength of the National Park family and partners; all means that we are great places to act as pioneering test beds. In fact, the concept of agri-environment schemes started in National Parks, as they came out from the Broads Grazing Marshes Conservation Scheme in March 1985. This led to the Broads Environmentally Sensitive Area (ESA) pilot scheme in March 1987. We are keen to keep this pioneering outlook alive today.

20. Our National Park Management Plans, led by National Park Authorities and supported in partnership with others sets the level of shared ambitions for what we want to achieve across the Parks. They embody and describe public goods, for the national good. We can therefore offer a crucial link between join-up and integrated planning for a place and future support for the land based sector.

21. The 10 English National Parks are currently exploring what sort of support/investment measures need to be in place post EU exit. We see EU exit as providing an opportunity to develop, in partnership with the farming and land management communities, locally-led schemes that
reward farmers for protecting and enhancing the special qualities of our national parks and providing a wide array of public benefits. Our initial thinking is of a ‘foundation level’ voluntary custodianship scheme, open to all land managers, which would provide a ‘base level’ of environmental management and public access in return for a revenue payment. Such a custodianship scheme could also be linked to developing the National Park brand – allowing businesses that are within this scheme to use the National Park brand to promote their positive management of the National Park. Above this custodianship scheme would a higher level scheme offering capital and/or revenue payments for a wide array of public benefits but focused on delivery of specific outcomes and potentially paying by results. At this stage, these ideas remain draft and we are working them up with the aim of submitting them to Government as part of the forthcoming consultations on the Environment and Food, Farming and Fisheries Green Papers. It is important that we are involved in helping to keep our landscapes fit for the 21st century and vibrant for the visitors who love these landscapes.

**National Park Authorities as Planning Authorities**

22. National Parks were brought into being and designated with statutory purposes to protect and enhance landscapes of natural beauty and to offer people opportunities to be inspired by this beauty through quiet recreation.

23. As planning authorities, National Park Authorities (NPAs) operate within the framework of the National Planning Policy Framework (NPPF). This identifies National Parks as important protected landscapes. It supports an approach to planning policy in a National Park that enables us to meet our statutory purposes to conserve and enhance the special qualities of the National Park in the long term and, through pursuing these purposes, our duty to seek to foster the socio-economic well-being of communities who live in the park. People visit National Parks, domestically and from abroad, because of the very beauty of the landscapes they offer and because the beauty and wonder in the landscape is cared for in many ways, including through planning decisions.

24. Our planning role has a clear sense of purpose and the evidence on approvals, timeliness, satisfaction shows that we offer a good and efficient service. For example, evidence from the Department of Communities Local Government shows that for the year ending March 2016:

- The National Park Authorities made decisions on 6,900 planning applications for the year ending March 2016.
- NPAs granted approval for 90% of planning applications (this is the same as the previous year).
- NPAs have a higher approval rate for planning applications (90%) than the English average (88%).

25. As an example, evidence by the Peak District National Park Authority shows that during 2016/17, as a planning authority, they approved 88% of the applications received, in all types of applications (major, minor, other of county matters), they exceeded targets on timeliness of decision making and achieved 82% satisfaction with their service from agents and applicants.

26. The independent Review of Designated Landscapes in Wales, conducted by Professor Terry Marsden, Dr Ruth William and Mr John Lloyd Jones published in October 2015, concluded amongst its recommendations that National Park Authorities in Wales should retain their Planning Function. The subsequent Future Landscapes programme, overseen by Lord Dafydd Ellis Thomas, has still to be published but there is no indication that this programme will reach
any different conclusion on the importance of the Planning function to the delivery of National Park Authority Statutory Purposes and Duties in Wales.

27. An earlier review in 2011, Welsh National Park Authorities Planning services review Stage 2 Part A – Executive summary – Jan 2011 concluded that:
   - There is a false public perception that the National Parks are more likely to decline a planning application than other LPAs. However, on average the Parks approve almost the same percentage of applications per year as other LPAs in Wales and England. With PCNPA and SNPA having a greater percentage of approved applications than a number of other Welsh Rural LPAs. Whilst the Parks’ statutory purposes are focused on protecting the environment and countryside, the Parks are also keen to demonstrate that this purpose is delivered in an environment of an enabling planning regime and these statistics demonstrate that this is the case.
   - It is recognised within the planning community that the speed of processing planning applications does not necessarily measure the quality of the planning process. However, notwithstanding these issues there is recognition that a sharper focus on the planning process has resulted in improved efficiency and an opportunity to take out unnecessary bureaucracy. This focus on improving process has resulted in a significant improvement in the speed of processing planning applications across the entire Parks over the last two years. For some of the application types such as Minor, Householder and Other, the Parks have performed better than a number of other Welsh Rural LPAs. Whilst all Parks have seen significant improvement, BBNPA has seen an almost 60% improvement in processing times for some application types over the last two years.


VAT on Repairs to Historic Buildings
29. The levying of VAT on repairs to historic buildings has long been a contentious issue, as the extra cost can prove a barrier to the viability of projects and can delay timely repairs. This impacts on buildings that are important heritage assets, including those identified by Historic England on the Heritage at Risk register. Timely repairs to conserve historic buildings prevent further damage to the building and the need for costly later reconstructive measures.

30. It is understood that the Government’s hands have been somewhat tied on this issue by European law. Britain’s exit from the European Union provides an opportunity to abolish the VAT levy for repairs to historic buildings. This could be an early win which would have clear and tangible benefits for the conservation of the historic environment in National Parks and the country as a whole. It would also support the maintenance of the traditional crafts and skills needed for the repair of historic buildings.

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