

Ymgyrch Diogelu Cymru Wledig Campaign for the Protection of Rural Wales



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The Review of Designated Landscapes in Wales
Third Floor, South Core,
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November 5th 2014

Dear Prof Marsden

Review of Designated Landscapes in Wales

Response by the Campaign for the Protection of Rural Wales (CPRW)

1. Context

1.1 The Campaign for the Protection of Rural Wales, Wales' foremost membership based landscape NGO, welcomes the opportunity to respond to this important Review, the once in a life time outcomes of which will be of paramount importance in guiding the future organisation and stewardship of Wales' most important landscapes.

1.2 As a member of the Alliance for National Parks Cymru, CPRW endorses the conclusions and recommendations of that submission. This response therefore reinforces and expands on a number of its key elements.

2. Our ambition for Wales' Protected landscapes

2.1 Wales' Protected Landscapes are National Treasures which should be endorsed as National Institutions, championed through National Leadership and showcased to profile their National importance.

2.2 Individually and collectively they contribute significantly to the image, prosperity and hiraeth that Wales has nationally and portrays to the world. Their successes should be acknowledged

2.3 They should become places which are even more inspiring and successfully demonstrate the synergy of all rural policies, synchronised investment and collective responsibility.

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2.4 CPRW believes this can and should be achieved by

- **Strengthening and energising the existing system of Protected Landscapes rather than replacing or amalgamating National Parks and Areas of Outstanding Natural Beauty into a single designation category.**
- **Refreshing and refining their existing Purposes, so they become resilient environmental / resource hubs which play a central role in natural resource management and provide a synchronised focus for Wales' sustainability and special styles of wellbeing effort.**
- **Linking them strategically with each other and their surroundings to enable a stronger network of Protected Landscapes to deliver a better landscape stewardship and connectivity which is geographically all-embracing of both land and sea.**
- **Supporting them strategically, operationally and financially through clear national leadership by Natural Resources Wales.**

2.5 We therefore enthusiastically anticipate the outcomes of this Review providing a robust confirmation of the national importance of these areas, a long term strategic vision which guides their future management in creative and sustainable ways and enables them to do more.

3 Making Protected Landscapes fit for the future

3.1 Formative legislation provided the ability to designate and establish Protected Landscapes¹ as ambitious places managed differently to other areas, so they provided specific public benefits. That intention has remained valid over the years and those who have been responsible for these special areas have continually and actively pursued this aspiration with imagination and enthusiasm even though the context, demands and expectations of these landscapes have continually changed.

¹ It is important to differentiate between the process of evaluating the national importance of landscapes to establish the legitimacy of their status i.e. their designation and the means by which any such areas are managed thereafter.

A Protected Landscape in the context of this submission is therefore recognised as a nationally important landscape which has been designated and has recognised organisational procedures in place which reflect a commitment to manage the area in ways which fulfil its reasons for designation.

3.2 Our Protected landscapes are now at the forefront of protecting the nation's most important landscape assets and have become test beds for incubating ideas which have led to a significant step change in our attitudes towards the role and value of the environment and the contribution it makes to modern day life. This work has been duly recognised internationally as an successful way of resolving the complex land use and development challenges associated with "lived in" environments with high sensitivities.

3.3 All the members of the Protected landscapes family have, in their own ways, developed bespoke approaches which help safeguard their important assets but more importantly have increasingly sought to link the use of their environments with opportunities to increase economic prosperity and social wellbeing.

3.4 Wales' Protected landscapes rather than being just attractive places are living landscapes which are socially engaged, contribute significantly to their rural economies and provide the settings for encouraging healthy living, public enjoyment, learning and personal development. The fact that all these opportunities and benefits are unparalleled in most other places in rural Wales and occur in the 25% of Wales which is designated is no coincidence.

3.5 Those responsible for these areas are "Stewards guiding and facilitating responsible rural change", in ways which protect and enhance ecological integrity, cultural authenticity and the distinctive identity of these special areas. Working in partnership with others, the character, quality and diversity of these landscapes, represent the collective expression of a shared responsibility to promote sustainable approaches to natural and cultural resources use.

3.6 We believe the continued and confident evolution of our Protected Landscapes should be enthusiastically but sensitively encouraged.

3.7 In the light of these changing circumstances, CPRW recognises as do many others, that it is therefore timely to take stock of the achievements of our Protected Landscapes, reflect on their weaknesses and review their future status and focus. We therefore support the refinement of their role to enable them to deliver new ambitions which will make Wales a more sustainable nation.

3.8 **CPRW does not however believe this should be achieved by a radical restructuring of the existing the system of designated landscapes, but a refinement of it.** Change should be evolutionary, building upon and magnifying the current strengths and successes of these areas both within their existing boundaries and increasingly beyond them.

4. Are designated landscapes therefore equipped to meet the current and future needs of Wales?

4.1 In short though not perfect, we believe the current approach to Protected Landscape designation and management is robust and has stood the test of time well. There is however scope for further refinement but these must first be framed by a strong and renewed commitment to the principles of Protected Landscapes, boosted by greater national leadership, influenced by informed behavioural change and underpinned by the necessary resources and tools and enable them to do their job better if they are to fulfil an additional social and economic role.

4.2 The fact that Protected landscapes have adapted to the changes around them whilst the system for administering them has remained the same, indicates that flexibility rather rigidity is the key to enabling them to continue to deliver the Purposes for which they were established. Their ability to guide change without compromising the integrity of their natural and cultural assets, demonstrates the value of the approaches they have developed.

4.3 In contemplating a changing role however, it is also important to ensure the international obligations which reflects their status are not tainted. Any new uses or activities encouraged within their areas must therefore be undertaken within those limits which define their conservation imperatives, the retention of the integrity of their resources and the authenticity of their special qualities.

5. A refreshed and enabling Protected Landscape Purpose

5.1 The extent to which the existing Purposes of Protected Landscapes are amended depends on the confidence that is bestowed on these areas and those who manage them, to rise to the challenges of integrating the ambitions of natural resource management, the promotion of eco systems service approaches in ways which facilitate the delivery of Welsh Government's wider range of wellbeing goals.

5.2 We believe that Welsh Government should set the ambition for Protected Landscapes high and enable them to play a leading role in charting a sustainable future for Wales.

5.3 Given a clear long term mandate, there is no reason why all Protected Landscapes, depending on their size, cannot deliver the elements of this ambition and become:

- a) Nationally valued landscapes characterised by enriched natural and cultural resources, safeguarded because of their national importance.
- b) Areas used creatively to increase economic prosperity and provide new forms of local employment.
- c) Managed spaces offering exceptional but unobtrusive opportunities for recreation and peaceful enjoyment unlikely to be found elsewhere.
- d) Places which stimulate imagination, healthy living, learning, personal development and challenge which help people enjoy and reconnect with nature and their heritage.
- e) Vibrant rural locations where change is guided and respects the obvious and less obvious values of these areas.
- f) Inheritance areas where future generations can share their current benefits fully and equally.

5.4 Our Protected Landscapes therefore require ambitious Purposes underpinned by a stewardship ethic which enables these outcomes to be achieved. A long term vision which reflects corporate responsibility and a desire to pass them on unimpaired and hopefully improved to future generations.

5.5 At the heart of this collective ambition must however be guarantees that the integrity and resilience of the resources of these areas are not compromised but vigilantly secured within accepted environmental tolerances.

5.6 CPRW has therefore considered if and how the existing Purposes of Protected Landscapes could to be refined to reflect these aims and concluded at the very least the existing twin Purposes of Conserving natural beauty, wildlife and cultural heritage and increasing public enjoyment of their qualities must be retained.

5.7 In addition we also recognise the contribution that Protected Landscapes can make to the national effort to integrate the management of natural resources so they have sufficient resilience to meet the challenges of climate change, the loss of biodiversity, and the public benefits which enhancing eco systems services creates. All of these should be reflected more directly in their Purposes.

5.8 We therefore suggest a clear role for Protected Landscapes in coordinating natural resource management within and where practical beyond their existing boundaries.

5.9 Likewise as the fortunes and destinies of people and Protected Landscapes become more inextricably linked, the opportunities they provide for enhancing social wellbeing and encouraging economic prosperity should also be reflected in their Purposes but in ways which safeguard the reasons why these places are special.

5.10 We therefore suggest a clear role for Protected Landscapes in facilitating those socio- economic activities which create lasting public benefits but do not compromise the integrity of these areas.

5.11 Finally as noted Protected Landscapes also require a long term ethic of purpose and stewardship that focusses on passing them on not only unimpaired but enhanced to future generations.

5.12 We therefore suggest that any refreshed Purposes should also clearly reflect a desire to promote intergenerational equity.

5.13 Whilst it would be possible to express all these intentions as a refreshed series of individual Purposes, the Welsh Government has expressed its desire to promote a cross cutting, integrated and multi-dimensional approach to sustainability. This desire has been clearly articulated in the Wellbeing Goals of the forthcoming “Wellbeing of Future Generations (Wales) Bill, with the promotion of sustainable development being linked to a better quality and more resilient environment, higher standards of living and improved social justice.

5.14 Whilst CPRW would be content to see the headline aims for Protected Landscapes expressed as a series of refreshed individual Purposes, we believe it better

to combine and express them in language which reflects a shared desire to achieve these wellbeing outcomes.

5.15 CPRW therefore believes that a **single unifying common purpose for Protected Landscapes** should be expressed as follows:

“To sustain and enhance for current and future generations, the natural beauty, wildlife and cultural heritage of the area whilst furthering the national and local ambitions of Well-being and its associated goals, in ways which safeguard the qualities and values for which these areas are designated.”

5.16 In suggesting this new single Purpose, it is important and should be explicitly established in the interpretation of this wording that this explicitly means therefore that

- The future stewardship of Wales’ Protected Landscapes must be conducted within those “Environmental limits” which ensure the integrity of their qualities and values are not compromised.
- If in pursuing any one of the wellbeing goals, a conflict arises with the aim of protecting the qualities and values for which these special areas have been designated, the latter must unequivocally prevail.
- The acknowledged **“Precautionary Principle”** continues to underpin any approach to the use or development of their areas.

5.17 Adopting this approach will enable Wales’ Protected Landscapes to remain permanent anchors of conservation in a continuum of change and also become dynamos for improving social and economic wellbeing.

5.18 In the future, we therefore see Protected landscapes as

- A network of areas linked by a common purpose and managed primarily but not exclusively for the opportunities they provide to increase the environment’s resilience and connectivity.
- Places where lifecycle stewardship fulfils the conservation imperative of protecting the distinctive role Protected Landscapes play in the nation’s consciousness.
- Rural areas which have a valuable role in increasing public wellbeing.

6. How would this new approach be delivered?

6.1 We believe the most practical means of achieving these outcomes is through the establishment of Regional partnerships of Protected Landscapes. Partnerships based on the current structures and organisational arrangements of National Parks and AONBs but organised geographically in ways which enable their collective experiences and successes to be shared, their challenges to be tackled jointly and their influences to be extended beyond their existing boundaries.

6.2 Our Protected Landscapes should become environmental hubs. Landscapes where the focus for natural resource management is spatially extended beyond their boundaries so that habitat and ecosystems connectivity occurs across geographically bigger areas. In this way they can help build greater environmental resilience and reverse the continuing fragmentation of nature and heritage values.

6.3 The feasibility of establishing a regional approach to landscape management should therefore be preferable to the establishment of a Single Protected Landscape Authority overseeing “islands of conservation effort” in a sea of environmental decline.

6.4 We also consider it important in this context to highlight the imperative of the planning and management of all Protected landscapes being pursued in a locally integrated and regionally cohesive manner. Without this conjoined approach, which independent studies have repeatedly demonstrated and the Williams Commission has recently confirmed, National Parks in particular would not have been able to promote sustainable development and integrated land uses over the large areas they encompass, as successfully as they have done.

6.5 We trust that the Review Panel will therefore confirm the critical inter relationship which must exist between conjoined planning and effective management in Protected landscapes and recommend to Government that these functions are retained in their totality by National Parks and strengthened in the case of the AONBs.

7. Promoting the ethic of Protected Landscapes

7.1 Successful Protected landscapes need visible leadership promoting them and proactive champions defending them.

7.2 This national leadership role should clearly be performed by Natural Resources Wales (NRW) as the legacy inherited by them from the Countryside Council for Wales.

7.3 As yet we see no evidence that this role is being actively fulfilled by Natural Resources Wales. The fact that neither an agenda for the future of Protected Landscapes nor the wider interests of the European Landscape Convention appear as priority themes in their current Corporate Plan, is a sad reflection of their lack of leadership of Protected Landscapes.

7.4 We believe this situation should be urgently rectified and Natural Resources Wales required to become more actively and visibly engaged, at the highest levels of the organisation, in the future fate of Protected Landscapes in Wales. We also suggest the need for Natural Resources Wales to report annually to Welsh Government on the outcomes and effectiveness of their engagement with all Protected Landscapes.

8. Should there be a single designation of protected landscapes in Wales?

8.1 CPRW reiterates its belief that the existing structure and independent identities of National Parks and AONBs do not need to be changed. Despite National Parks and AONBs varying in scale, complexity, profile and the resources available to them for management, they already share a common aim.

8.2 Establishing a more closely integrated coherent system and where necessary an extended network of Protected Landscapes with a unified purpose is preferable to reforming them to create a single category.

8.3 We do not see any advantage in reconfiguring Protected Landscapes which by their nature will always be significantly different in their geographical form, the nature, scale and means by which they can they can deliver their benefits. Flexibility and proper resourcing which reflects their different needs, coupled with the tools to find local solutions to the local challenges, is what is required.

9. Summary

9.1 Wales' Protected Landscapes already make a significant contribution to conservation, sustainable development and the well-being ambitions of the Welsh nation. With suitable refinement of their Purposes and the resources to do so, they can achieve more and become truly fit for the future.

9.2 Wales' Protected Landscapes need a clear, refreshed and modern ambition which maintains the value and integrity of what makes them special but at the same time enables them to deliver approaches which enhance public wellbeing well into the future.

9.3 We agree with the Alliance for National Parks Cymru, this part of the Review must strongly recommend to Welsh Government that:

- Protected Landscapes have a single unifying Purpose which positions them to make an enhanced contribution to the wellbeing aims of Welsh Government.
- The existing organisational and management arrangements for Wales' National Parks and AONBs should remain and any temptation to establish a Single designation of Protected landscapes or a 'one size fits all' approach to their management is resisted.
- The remit of the existing network is extended to enable them to work collectively and operate more cohesively across larger geographical areas of Wales.
- The designation process is refreshed to enable nationally important coastal landscapes to be extended out to sea, in recognition of the qualities they derive from their associations with their adjacent marine environments.
- An up to date and comprehensive national policy for all Protected Landscapes is urgently needed to provide a clear framework which links environmental stewardship with the promotion of enhanced public wellbeing within responsible limits.
- Protected Landscape Management Plans incorporate the management of the natural resources and through collaborative refinement with partners, become the recognised Well-being plan for their designated area.
- The fundamental relationship between the planning and management of Protected Landscapes is maintained in full by National Park Authorities and strengthened in the case of AONBs.
- Natural Resources Wales performs a much more recognisable role in championing the national leadership of Protected Landscapes and reports annually on its performance in this respect.
- The statutory duty on all public bodies and relevant statutory undertakers to engage with and respect the interests of Protected landscapes and their communities when undertaking work in these areas, is strengthened and they become more accountable for the manner in which they operate in Protected landscapes.

- A national Protected Landscape Stakeholder Forum is established complemented locally by formal Stakeholder Advisory groups in each designated landscape area to increase stakeholder engagement with the work of Protected landscapes.

9.4 CPRW is pleased to have had the opportunity to contribute to this important Review and looks forward to its outcomes. We confirm that the content of this submission can be made available to others if so required.

Yours Sincerely,

A handwritten signature in black ink, appearing to read 'Peter Ogden', with a long horizontal flourish extending to the right.

Peter Ogden :
Director