

Alliance
for
National Parks
Cymru



Cynghrair
Parciau
Cenedlaethol
Cymru

COMMENTS ON THE STAGE 1 REPORT OF THE REVIEW PANEL

The Alliance welcomes the direction of travel and the guiding principles set out in the Stage 1 Report, in particular the link forged with the Well-being and natural resource management agendas that will now be centre stage in Wales.

We have the following observations on the recommendations:

Recommendation 1 and 2

1. We support this recommendation to the extent that it is important to recognise that the means of looking after National Parks and AONBs are different. However, we feel that the recommendations for one set of statutory purposes for all designated landscapes and the notion of a family of designated landscapes rightly brings into focus the fact that the designations we have are of equal value and will help to dispel the perception that we have a two-tier system of designated landscapes in Wales.

Recommendations 3 and 4

2. As mentioned above we support the idea of having a single and clear set of statutory purpose and the notion of a family of designated landscapes. However, we are not clear as to what is meant in the second part of paragraph 8.3.1 “.. [ii] by seeing both designations as the leading statutory designated landscapes of Wales amongst a more connected and networked family of designations.” It seems to suggest that there are other designated landscapes in Wales, which there aren't.
3. We welcome the notion of a more consistent nomenclature with the new family name “National Designated Landscapes of Wales” and the retention of “National Parks”. However, the change of the name AONB to “National Landscapes” is not an improvement because it is so similar to the family name and National Parks are National Landscapes too, just as they are now designated for their outstanding natural beauty. That said it is important that AONBs are recognised as “National”.

Recommendation 5

4. As indicated above we support the proposal for a single set of purposes in that they forge a link to the well-being and natural resource management agenda and help to debunk the myth that that AONBs on account of the relatively small scale are not able to deliver ecosystem services . However, we question:

- Whether the use of the terms landscape and seascape, whilst welcome, is capable of being translated into legislation, in view of the difficulty the lawyers have had in defining landscape in the Environment Bill – to the extent that the term has been dropped
- Why in the third purpose only cultural heritage should be supported – surely “*sustainable forms of natural resource management and economic and community development*” should support the distinctive landscape and seascape qualities of the area
- Why, in view of the support in the report for the extension of the Sandford principle and the primacy of the 1st purpose, it is not made clear within the statement of purposes that the 2nd and 3rd purpose are subject to the 1st – in this context we do not see how the diagram on page 34 represents this, nor do we see the significance of the “interlocking mechanism”

We would also suggest that it is made clear that the revised ‘Sandford Principle’ should apply to all public bodies – in Scotland it only applies to the National Park Authorities.

Recommendation 6

5. We welcome the recognition that the duty “*to have regard*” is very weak. However, we are not convinced that the extension of the duty to “*contribute to the delivery*” is sufficient. We will return to this matter in our evidence to the 2nd Stage of the Review.
6. Finally we welcome the recognition of the “seascape” dimension of coastal designated landscapes in paragraph 8.5.8. However, we consider that there should be a separate recommendation addressing this fundamental relationship between land and sea – its significance is rather lost in Recommendation 5.