

Alliance
for
National Parks
Cymru



Cynghrair
Parciau
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Submission to Welsh Government on the pre-consultation draft of the Marine Plan for Wales

1. The Alliance¹ welcomes the opportunity to comment on the pre-consultation draft of the Marine Plan for Wales.
2. Our interest lies in a sustainable future for Wales' designated landscapes, five of which have a strong coastal dimension – Pembrokeshire Coast and Snowdonia NPs and the Anglesey, Llŷn and Gower AONBs as well as the Ceredigion, Glamorgan and Great Orme Heritage Coasts, which lie outside the designated landscapes but are of national importance as outstanding undeveloped landscapes.
3. It is therefore most welcome to read that an objective [No 7] has been included “to promote stewardship and enjoyment of **heritage assets**, nationally **protected landscapes** and support that decisions take account of the **seascape character** of the local area”.
4. However, we are surprised that of the three elements you highlight in this objective policies have not been developed for respect protected landscapes. This is somewhat surprising since it is recognised in the text:
 - on page 44, 2nd paragraph of the background to Heritage that *“the sea is an essential part of the character of many conservation areas, including Areas of Outstanding Natural Beauty [AONBs and National Parks and the setting of numerous Listed Buildings and Scheduled Ancient monuments”*
 - in the penultimate and final paragraphs on page 48 and top of page 49 that
 - *“Decision makers in taking relevant decisions must have regard to the statutory purposes of National Parks and AONBs in coastal areas, including their plans, policies and special qualities being protected.....”*
 - *“Any relevant guidance including management plans for National Parks and AONBs should inform decisions”* and

¹ The Alliance is led by the voluntary Societies of the three Welsh National Parks, the Gower Society, the Campaign for the Protection of Rural Wales and the National Association for Areas of Outstanding Natural Beauty to coordinate the voluntary sector's response to the emerging policy and legislative agenda of the Welsh government as it affects designated landscapes.

- *“Proposed development adjacent to or visible from designated areas or area of undeveloped coast should be considered carefully, in support of the direction provided by PPW”*
 - in the penultimate paragraph of page 49 that *“In other areas there may be a greater public interest role in conserving natural or historic character and associated special qualities such as wildness, remoteness and heritage where certain developments may not be appropriate.”*
5. Given the above statements it is important, in our view, that policies are developed specifically for National Parks, AONBs and Heritage Coasts to complement those in place covering the heritage and seascapes. The relevance of developing such policies is greater now that detailed seascape character assessments have not only been prepared for the Pembrokeshire Coast and Snowdonia National Parks but also adopted as Supplementary Planning Guidance. An assessment has also been prepared for Anglesey AONB and one is being prepared for Gower.
 6. Further one of the recommendations of the Marsden Report on the purposes and governance of designated landscapes in Wales was to propose that *“the Welsh Government and Natural Resources Wales should extend the coastal National Landscapes to cover adjacent sea areas and take an integrated approach to coastal resource management in these areas”* [Recommendation 19] and that *“National landscapes managers should ensure that coastal users are at the centre of their coastal management planning processes”*. In this context we welcome the inclusion of Objective 6 in relation to access to the coast and sea.
 7. We also welcome
 - Objectives 9, 10 and 11 relating to *“Living within environmental limits”* – marine biodiversity and ecosystems are very important elements of the marine component of designated landscapes on the coast. These objectives should be noted as contributing to the objective relating to protected landscapes and the principle of living within environmental limits should be applied to protected landscapes too
 - The suite of objectives set to achieve a sustainable marine economy [Objectives 1 to 4] are of direct relevance to protected landscapes as they are places where people live and work and derive their income from the high quality of the marine environment and marine related activity – it is important that the link between the two is made in the plan. In this context Objective 5 relating to *“...support of the development of vibrant and more equitable, culturally distinct, sustainable and resilient communities thereby contributing to the well-being of future generations”* is also important to protected landscapes which contain many coastal communities. We feel that the link between the two should be made
 - Objective 4, in particular, addressing the management of multiple use, is especially relevant in the context of protected landscapes where nature conservation, recreation and fishing can clash in their use of the marine environment – in this context we are unable to find any proposals to create a proper management framework in certain areas, such as the marine part of protected landscapes, where there is such competition for the use of the sea. We feel that this omission should be addressed

- Objectives 12, 13, 14 and 15 which promote good governance, especially 12 which addresses integrated decision making across the land-sea interface – a crucial process in relation to areas whose special qualities embrace both land and sea

The nature of the comments above show, we hope, that it is important to consider coastal protected landscapes [or designated landscapes as they tend to be called now] in a wider context that simply the view and their special qualities - important though they are. They are places where people live and work and to which people come in large numbers to enjoy their special environment – many of whom depend on a high quality marine environment for their livelihood and enjoyment. Given the significant length of the Welsh coast designated and the overall role they play in the well-being of Wales, we feel that they should be given due prominence in the marine plan. These are, we are sure, matters that will be raised during the work on the “Future Landscapes Programme” upon which the Government has embarked and with which we are closely involved.

We would welcome the opportunity of discussing the points we have raised as the plan is developed into a consultation draft.

Alliance for National Parks Cymru
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