

*Alliance
for
National Parks
Cymru*



*Cynghrair
Parciau
Cenedlaethol
Cymru*

THE REVIEW OF DESIGNATED LANDSCAPES IN WALES

SUBMISSION

OF

THE ALLIANCE FOR NATIONAL PARKS CYMRU

November 2014

EXECUTIVE SUMMARY

1. The Alliance for National Parks Cymru believes this Review should take a “once in a generation” opportunity to create a modern and appropriate framework for the stewardship of all our nationally important designated landscapes which thereafter guides the appropriate organisational and management arrangements for each of these areas.
2. We recognise that despite the nature and context of designated landscapes of Wales having shifted subtly over the years and is continuing to do so, the special qualities of these protected landscapes still flourish and their national value remains unquestioned.
3. This Review therefore provides the ideal opportunity to endorse the creative successes which protected landscapes have achieved and in so doing, promote the continued and inspiring evolution of the current system rather than suggesting a revolutionary restructuring of it.
4. We believe this can be achieved by a mixture of modest legislative measures coupled with a variety of innovative improvements to the context within which these areas operate. Such an approach will enable our protected landscapes to mature further and contribute even more to life in 21st century Wales.
5. We therefore believe the conclusions of this Review must initially reaffirm the following principles in respect of Wales’ protected landscapes:
 - a) the undeniable national importance and unique stewardship role of protected landscapes
 - b) the significant contribution these areas make to sustainable development and the public well-being ambitions of the Welsh nation and their potential to achieving more. In this respect
 - c) the need to refresh the designation processes and in particular supporting the principle those nationally important landscapes on the coast should be extended out to sea in recognition of the fact that they derive many of their special qualities from the marine environment and their associations with it
 - d) the existing arrangements for administering and managing our National Parks and AONBs are maintained but additional bespoke approaches for other places which don’t easily fit these models are developed
 - e) bring to an end the notion that a two tier protected landscape system exists in Wales but retain the distinctive individuality and identity of both National Parks and AONBs.
6. To deliver the outcomes associated with these principles, we therefore recommend the Review Panel:
 - a) resists any temptation to promote a ‘single protected landscape designation’ or a ‘one size fits all’ approach to the management of these areas, as this would not fit comfortably with or reflect the varying scales or circumstances associated with different

protected landscapes; and in so doing, confirm that the existing organisational arrangements for National Parks and AONBs should be retained

- b) advises Welsh Government to adopt a standard definition for nationally important landscapes and seascapes, which separates the status of these areas from the arrangements for their management and to affirm that a designated landscape is:

“A landscape or seascape of national importance because of the quality and value of its natural beauty, wildlife and cultural heritage.”

- c) endorses the need for nationally important landscapes and seascapes to have a modern, ambitious and common statutory purpose which builds on their existing purposes and also recognises their further potential.

- d) proposes this single unifying purpose for protected landscapes and seascapes should be:

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

This single purpose would enable the assets of protected landscapes and seascapes to be both effectively protected and used responsibly to provide a range of social and economic benefits without harming their integrity or national value

- e) confirms the urgent need for an ambitious and comprehensive national policy framework for protected landscapes and seascapes which positions them at the heart of efforts to link future environmental stewardship with the promotion of enhanced public wellbeing
- f) advocates that existing protected landscape management plans evolve to provide a sound basis for the practical management of the natural resources within their areas and through collaborative refinement with partners, demonstrate how they can help deliver the Welsh Government wellbeing goals. By doing so management plans for protected landscapes would become the recognised Well-being plan for those geographically special areas. In advocating the evolution of management plans, the importance of extending them to embrace any area of sea needs to be stressed
- g) Endorse the fact that the long term custodianship of these special areas depends on the successful integration of sustainable approaches to development and land use planning with the stewardship of their resources. It is important, therefore, that National Park Authorities maintain both these functions in full and that AONBs planning role is strengthened, in ways previously suggested to Government by independent studies

- h) recommends that Natural Resources Wales performs a much more obvious and recognisable role in championing the national leadership of protected landscapes and seascapes; and reports annually on its performance in this respect
- i) confirms that all public bodies and relevant statutory undertakers have a statutory responsibility to engage with and promote the interests of protected landscapes/ seascapes and their communities when undertaking work in these areas and become accountable for the manner they do so. In so doing they should be obliged to participate in and adopt any proposed Well-being plan for a protected landscape or seascape area and to report annually on how they have contributed to its delivery
- j) recommends that co-operation and collaboration across the family of designated landscapes and seascapes is improved through strengthening existing professional and stakeholder networks or developing new ones, to share experiences, complement and increase collective effort and enable them to function more effectively over wider geographical areas
- k) advocates the establishment of a national protected landscape/seascape Stakeholder Forum complemented locally by a formal Stakeholder Advisory Group in each protected designated landscape area to increase stakeholder understanding and awareness of and engagement with protected landscapes, nationally and locally.

THE REVIEW OF DESIGNATED LANDSCAPES IN WALES
SUBMISSION BY THE ALLIANCE FOR NATIONAL PARKS CYMRU

The Alliance

1. The Alliance was set up by the voluntary Societies of the three Welsh National Parks, 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. Representatives of these bodies have been responsible for drafting this submission.¹ The Gower Society has also provided an input to reflect the voluntary sector in Welsh AONBs. While representatives of these organisations, who number those with many years of professional experience in working with National Parks and AONBs, have contributed to the development of this evidence, the individual organisations may also be submitting evidence in their own names.

Introduction

2. The Alliance for National Parks Cymru welcomes the opportunity to offer its views to the Review Panel. We believe that the Review presents a “once in a generation” opportunity to
 - a) create a modern and appropriate framework for looking after our nationally important landscapes and seascapes in the future – a framework that:
 - enables the identification of all landscapes and seascapes² of national importance in Wales
 - ensures that there is a clear and common purpose underpinning status of those identified areas
 - provides for appropriate organisational and management arrangements for each area to enable that purpose to be achieved
 - b) creates the context and stimulus, nationally and locally, within which designated landscapes and seascapes continue to flourish and enhance the contribution they already make to the well-being of current and future generations.

¹ An early draft of the submission was circulated to a wide range of organisations with an interest in the designated landscapes including the Ramblers association, the Youth Hostels Association, the National Trust, the Campaign for National Parks, the Welsh Archaeological Trusts and representatives of the three National Park Authorities and of AONB officers

² Throughout our evidence we consciously refer to landscapes and seascapes in the belief that an attempt to develop an integrated approach to the management of Wales’ landscape assets cannot be achieved if these two territorial domains are considered separately.

3. We recognise that:
 - a) the management of the designated landscapes of Wales has subtly evolved over the years, in response to changing circumstances through a combination of the refinement of legislation and a conscious adaptation on the part of those responsible for managing these areas to promote new and creative ways of working
 - b) as a consequence of these changing circumstances, not only have the qualities of these areas been sustained and enhanced, but they have also made a significant and pioneering contribution to understanding the issues which will help achieve the Welsh Government's central sustainability agenda
 - c) these landscapes are facing a multitude of challenges and in the near future.
4. Given this context, in putting forward recommendations for change, we advocate a **continued evolution of the present system, rather than a revolutionary restructuring of it**. We believe that a mixture of modest legislative measures coupled with a variety of innovative but all important improvements to the context within which these areas are looked after, will make our protected landscapes and seascapes even fitter for purpose and enable them to contribute even more to life and well-being in 21st century Wales.
5. Whilst the changes we recommend will, we contend, provide the framework for success, we do not underestimate the underlying challenge of ensuring that these areas become central to Welsh Life rather than being regarded as a fringe benefit – behavioural and attitudinal change towards them will be crucial. We believe that the framework we advocate will assist these changes.

Our approach

6. In preparing our evidence for this Review it has become clear to us, that the question of whether or not there should be a single designation of protected landscape is inextricably linked with the question as to whether or not the current arrangements to administer and manage Wales' special landscapes are fit for purpose. We have therefore considered the two questions which form the basis of the Terms of Reference for the Review together.
7. Our evidence is structured in three parts:
 - a) in **Part 1** we discuss the key issues which have influenced our recommendations
 - b) in **Part 2** we address the overall system of landscape designation and its fitness for purpose, covering in particular the question posed in the terms of reference - "should there be a single designation of protected landscapes in Wales?" and the issue of what the purpose of protected landscapes should be

- c) in **Part 3**, having dealt with the overall system we address what we consider should be its component parts. In doing so we have suggested that there are a number of components that are essential for a system to be fit for purpose. We have assessed the present system against these components and have identified where either legislative or behavioural change is needed.
8. Earlier this year the Alliance published a set of “Principles for the long term care of Wales’ Protected Landscapes”. We believe that these principles should provide the focus for attitudinal change and underpin future policies and legislation. Once the nationally important landscapes have been identified and given a clear purpose, we believe they should be regarded in the following way:
- **acknowledged as national assets – not just places with pretty views, but vital natural resources which embrace the very best of Wales’ wildlife, cultural heritage and natural beauty**
 - **places which are cared for and sensitively managed to ensure that the range and integrity of those services and public benefits which are derived from their special qualities and wider ecosystems, continue to flow**
 - **positively managed as living and working landscapes, with the retention of their special qualities setting the “environmental limits” for their sustainable development aims**
 - **places where their managers and all public bodies actively and collectively facilitate the integration of socio-economic activities, in ways which do not degrade or compromise their special qualities**
 - **assets with powerful earning potential for the tourism and other appropriate environmentally based industries**
 - **places where the governance arrangements facilitate collaboration across sectors, supporting collective action and collaboration**
 - **environments where the benefits of this integrated approach flow beyond their boundaries, so that ecosystem resilience is enhanced over wider geographical areas**
 - **extended out to sea, to enable those areas on the coast, which derive many of their special qualities from the marine environment and their association with it, to be managed in a fully integrated way.**

These characteristic values of protected landscapes we believe should underpin our future ambitions of Wales’ protected landscapes and the manner in which they are managed. **We therefore commend them** to the Review Panel.

PART 1

KEY ISSUES INFORMING OUR RECOMMENDATIONS

1.1. Our proposals have been informed by a number of key issues:

- a) the evolution of the system of designated landscapes
- b) the nature of the changing context affecting designated areas
- c) the response to these changes in designated landscapes
- d) the relationship between the current ambition to promote sustainable development and the current situation in designated landscapes
- e) the relationship between land and sea in the context of protected landscapes.

The Evolution of the system of designated landscapes

1.2. The legislation governing protected landscapes has evolved over the years in response to changing circumstances:

- a) when recreation was seen to be a threat to the conservation of the national parks, legislation was passed to ensure that if they could not be reconciled in ways which ensured that the conservation purpose of these areas prevailed, conservation interests should still be given priority
- b) following the findings and recommendations of the independent committee chaired by the late Professor Ron Edwards of Cardiff University, National Park Authorities [NPAs] were created and given planning powers when it was realised that single purpose authorities operating locally within these areas were needed to ensure the long term conservation of their special values
- c) in response to national parks being recognised as living and working landscapes, the NPAs were given a duty to foster the economic and social well-being of the communities within their areas
- d) when the scope of natural beauty was questioned, it was made clear in legislation that their purpose was to conserve and enhance not only their natural beauty but also their inherent wildlife values and cultural heritage assets
- e) in 2000 the provisions for managing AONBs were strengthened when legislation was introduced to create a duty of regard for the AONB purpose, a statutory requirement for AONB management plans and to enable the creation of AONB Conservation Boards.

1.3. We believe that it is important to emphasise that, as noted above, whilst the legislative framework has evolved, the fundamental tenet of recognising the national importance of certain landscapes has not been questioned. Indeed recent ministerial statements reaffirm the importance of this principle.

1.4. Further, all the changes made in legislation have served to reinforce the importance of having special provisions which safeguard the national importance of the assets of these

areas, so that they continue to be looked after in the future and allowed to evolve as they have done in the past.

- 1.5. Alongside this, it is also important to recognise that because of the different circumstances in the UK, the way we have looked after our nationally important landscapes has been recognised internationally as an appropriate response to our circumstances and hailed as a shining example of how to integrate a range of human activity with the need to care for those important resources and values which our natural environment provide.

The changing context affecting protected landscapes

- 1.6. Notwithstanding the operational changes which have evolved locally in managing these national assets, it is some years since there has been legislative change to mirror them.
- 1.7. In addition more recently the context in which our finest landscapes have been looked after has also changed considerably as the Welsh Government grapples with the consequences of a sluggish economy, the desire for a more sustainable approach to resource use, the continuing loss of biodiversity, health and well-being and the challenges associated with a changing climate and environmental dysfunction. Those managing protected landscapes have therefore been faced with a plethora of new approaches:
 - a) the desire to promote a unified approach to sustainability and sustainable development in ways which create well-being for local communities and for the nation as a whole
 - b) fulfilling their European obligation to safeguard Wales' Biodiversity – namely a desire to focus on delivering on the obligations of the Convention for Biological Diversity
 - c) coping with increased demands for access to their areas, along with a greater recognition of the economic dependency of these areas on tourist and leisure uses.
 - d) the promotion of an ecosystems approach to enable the environment to offer a wider range of public services and the opportunities to reconnect people with nature
 - e) furthering the principles of the European Landscape Convention
 - f) the development of an integrated approach to natural resource management
 - g) ensuring that the environments of land and sea are managed in an integrated manner
 - h) encouraging greater local engagement by communities in promoting the well-being of their own areas.

All of these challenges will, it is anticipated, be driven forward through provisions of new legislation to collectively underpin these new approaches.

The protected landscape response to these changes thus far

- 1.8. The Alliance believes that the response of the managers of our designated landscapes to these changes has not only been enthusiastic but also successful in adapting to new circumstances thus far. Their track record therefore makes them we believe equally well placed to adapt to any new changes. When enabled and given the correct opportunities and tools we contend that those responsible for their management are therefore quite adept at adapting to change in response to the challenges in the world around them.
- 1.9. They have delivered a great deal in terms of the current agenda of the Welsh Government, especially in relation to the economy, health, natural resource management and tourism in particular. Indeed many are already delivering the kinds of benefits the Welsh Government requires of its new ecosystem services and wellbeing approach. The key conclusion of the Arup report³, although referring specifically to the three national parks, encapsulates all the things that all designated landscapes are achieving:

“The three National Parks in Wales need to be viewed as key strategic assets that must be sustained for the future. This study finds that the economic benefits extend well beyond the boundaries of the Parks themselves. The National Park designation has served Wales well over the last half a century and has enhanced the economic and social value of the Parks to Wales..... The National Parks enhance biodiversity, enable access to the countryside; and contribute to the visitor experience; and provide a high quality environment for local communities.”

The Welsh Government’s strategy for the development of the Tourism Industry - Partnership for Growth identifies the National Parks, the AONBs and the 870 mile long coastal path as major assets for growing tourism sustainably. The fact is that they have become iconic features of the Welsh Tourism Industry of international significance not simply for their own areas but for Wales as a whole.

Notwithstanding these achievements, the Alliance considers that they need to be better equipped. The next section describes one of the key issues

The relationship between the current ambition to promote sustainable development and the current situation in designated landscapes

- 1.10. The Alliance contends that one of the main issues facing protected landscapes in Wales is the way that the socio-economic well-being of local communities will be facilitated – an issue at the heart of sustainable development. The definition of sustainable development that has been used in Wales in recent years [though not in the Well-being of Future Generations Bill] highlights the need to live within environmental limits.
- 1.11. In the context of protected landscapes those limits are well established through the statutory requirements to conserve and enhance their natural beauty and hence protect the services they provide. In the context of recreation and access in national parks conflicts

³ “Valuing Wales’ National Parks”, Arup for National Parks Wales, NRW and WLGA September 2013

with the primary purpose of conserving natural beauty are addressed in law, with the primary purpose prevailing. However this 'environmental limit' does not extend to conflicts between natural beauty of an area and the realising of its socio-economic potential.

- 1.12. The delicate process of promoting the sustainable use of natural resources within protected landscapes in ways that integrate social and economic activity with their special qualities has been at the heart of the work of the NPAs and AONB partnerships over many years. Their positive approach to partnership working has been the essential in achieving their success i.e. enabling what can be done.
- 1.13. However, despite their successes there remains an underserved perception that this work undertaken in this area is negative in its approach. We believe that to dispel this perception it should be made much clearer that:
- a) protected landscapes are living and vibrant landscapes where appropriate socio-economic activity is not only a prerequisite for their sustainable future but also welcomed
 - b) the only way of achieving sustainable development is for both the enjoyment of the area and socio-economic activity to be integrated with the special qualities without damaging them
 - c) the planning system should be much more creative in its approach to these matters.
- 1.14. Furthermore, the role and function of those organisations responsible for the management of these areas – NPAs and AONB partnerships – in relation to these activities need to be made clearer and a more pro-active approach enabled. Our proposals for the purposes of designated landscapes part 2 of our response deal with this issue. In addition the present duty on public bodies to have regard for the purposes of designated landscapes needs to be strengthened. This issue is addressed in Part 3 of our response.
- 1.15. In this context the Alliance has already expressed its concern that the “Well-being of Future Generations Bill” is deficient in a number of respects, in particular:
- a) the absence of the concept of environmental limits within the definition of sustainable development, despite this having been recognised in recent years by the Welsh Government as a crucial element of this approach
 - b) the absence of any direct reference to landscapes and seascapes, let alone those designated on account of their national importance in helping to deliver the Government’s Well-being Goals
 - c) the failure in the Bill to explain the relationship between NP and AONB objectives and the Well-being Objectives of Ministers and Public Bodies in the absence of any means of reconciling differences, particularly in the absence of any recognition of environmental limits

- d) the lack of clarity of the relationship between protected landscape management plans and the proposed Well-being Plans covering their area – an important issue as PL plans cover 25% of Wales.

Our recommendations concerning the essential link that needs to be formed with the Well-being Agenda are detailed in Part 2 of our evidence.

The relationship between land and sea in the context of protected landscapes

- 1.16. Five of Wales' designated landscapes [Pembrokeshire Coast and Snowdonia NPs and Anglesey, Gower and Llŷn AONBs] have significant stretches of coast and derive many of their special qualities from the marine environment and their associations with it.
- 1.17. With the advent of marine planning and the increasing need to manage coastal waters, especially the interaction between water based recreation and wildlife, the Alliance considers it essential that a policy framework is created to deal with this relationship. A framework within which coastal protected landscapes are actively encouraged to promote and influence a sustainable future for the special qualities they derive from the marine environment and their association with it through their management plans and the marine planning process; a framework that would need to be underpinned by legislation.
- 1.18. The 2007 Welsh Government Policy statement for national parks went as far as expecting that the two NPAs would have key roles to play in the application of the principles of Integrate Coastal Zone Management [ICZM] as set out in the ICZM Strategy for Wales and in the implementation of the new system of marine planning when it is introduced. However, it did not go into any detail as to how this would be achieved. One of the practical measures in the ICZM Strategy was the intention to provide guidance on how the planning and management of coastal protected landscapes could be integrated with the planning and management of adjacent coastal waters. It has never been done.
- 1.19. The Alliance believes that there are three steps necessary to create the framework for the integration of protected landscapes with their adjacent marine environment:
 - a) **Recognition in statute of the marine dimension of coastal protected landscapes** – namely where there is an area of sea that can be defined as being part of each coastal protected landscape on account of the special qualities it derives directly from the marine environment or its association with it. Such extensions would need to be underpinned by legislation as there are currently no powers to extend protected landscapes into the marine environment. The recognition of these areas will be crucial in informing the forthcoming marine plan process. Powers already exist in Scotland for national parks to cover land and sea and the IUCN guidelines recognise such areas that cover land and sea too.
 - b) **Extension of management plans for each protected landscape to cover their marine area** – a consequence of extending protected landscapes into the marine environment would be the extension of the management plan to cover this area,

thus providing a framework for all of those who have responsibility for managing particular elements of the marine environment or particular activities. Legislation would be needed particularly to ensure integration of the extended plan with marine plan process, to establish the NPA or AONB Partnership as the lead organisation for preparing it and to ensure that plans for marine conservation areas [e.g. SACs] are integrated with it too.

- c) **Giving NPAs and the LAs responsible for AONBs a duty to manage water based recreation** – this is an emerging issue for coastal PLs and the managers of marine conservation areas. Currently there appears to be no organisation with the duty to manage these activities. In the case of national parks it would be consistent with their purposes to give such a duty to the NPA. In the case of AONBs, although not a statutory purpose, water based recreation is a very real issue, it would be appropriate for the relevant local authorities to have such a duty.

1.20. The Alliance believes that those responsible for protected landscapes are very well placed to perform this role of integrating the planning and management of land and sea. On land their approach is to integrate activities with the special qualities of their area and to work with people and organisations - skills that are readily transferable to a different environment with different stakeholders.

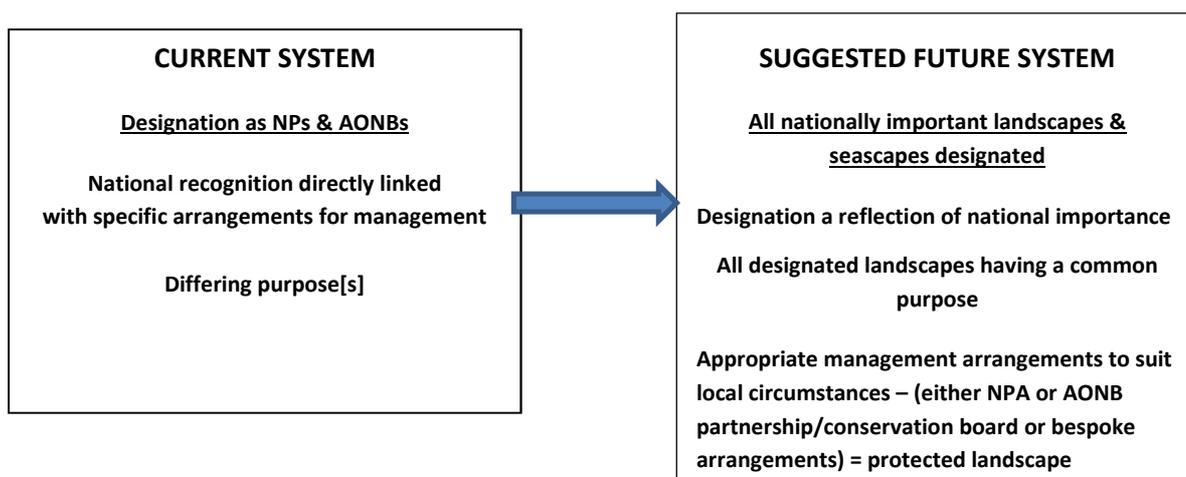
1.21. Our proposals in Parts 2 and 3 of our evidence refer to specific elements of forging the link between land and sea – extending boundaries and the spatial coverage of management plans.

PART 2

THE OVERALL DESIGNATION SYSTEM AND ITS PURPOSE

- 2.1. One of the fundamental issues for the Alliance in considering the manner in which our protected landscapes should be structured in the future is what is meant by “designation” and “a single designation”, and thereafter what is the purpose of designated landscapes. Without first answering these issues then it is neither logical nor possible to consider the correct mechanism for the governance of them.
- 2.2. The current system of designation links recognition of the national importance of an area with a specific way it is to be looked after – either as a National Park looked after by an NPA or as an AONB and looked after by an AONB Partnership or Conservation Board. This approach was adopted to recognise the differences of scale between landscapes which were geographically large and varied and contained extensive areas of open country, now designated as National Parks; and those which were smaller in area, comprising large tracts of farmland yet equally important in their own right. These were designated AONBs. The only difference between the two is that by virtue of the extent of their open country, National Parks were also recognised as having the ability to provide opportunities for open access, (though in practice AONBs have also taken on this role and provided for public access.) Despite their differences, each approach was designed with the **same common long term intention**.
- 2.3. However, we believe that the present system, as it has evolved, rather than facilitating and promoting an understanding of what is important and common about these areas and the way they should be looked after, has actually obscured this commonality of purpose; and in so doing has led to the misguided notion that the system is in some way two-tiered with AONB’s being less important than National Parks – a notion referred to in the terms of reference of the Review.
- 2.4. It is for this reason that **we recommend** that national recognition should be separated from the arrangements for managing the area. This, we suggest, would be achieved by having:
- a) A single “family” of designated nationally important landscapes and seascapes **with a common basis for their definition linked to a modern, ambitious and common Statutory Purpose**
 - b) **A variety of arrangements to choose from for managing any nationally designated landscape or seascape areas.** In this refreshed system the National Parks and AONBs would retain their distinctive management arrangements [National Park Authorities and AONB partnerships], whilst new bespoke arrangements would be introduced for newly recognised areas for which NPA or AONB arrangements are not appropriate. In this way the very important National Park and AONB brands would be retained.

2.5. In summary we see the pathway for the evolution of the present arrangement as follows



2.6. Such an approach would therefore result in a common basis being established for according National Status to the existing designated areas and any further areas that might be recognised in the future - the “family” is by no means complete. The establishment of such a “family” approach to recognising areas of national significance would thereafter be underpinned by a variety of means of looking after each area which would vary according to local needs and circumstances. **In this context we are firmly of the belief that a “single designation” implying a single way of looking after any nationally important landscape or seascape would be inappropriate.**⁴

2.7. The adoption of this approach would ensure that the long held misconception of protected landscapes being a hierarchical two-tier system is finally dispelled and the concept of a “family” of designated landscapes and seascapes could be promoted and implemented. This approach would also enable both the purpose and role of designated areas to be better understood and more closely aligned with the status of those other landscapes areas beyond their boundaries which are regionally or locally important.

2.8. We also believe that the approach would build on the many strengths of the present system, which has served the nation and the public well since its inception in the 1949 Act - a system which as noted previously has evolved over the years in response to changing legal and contextual circumstances.

⁴ We would like to establish the usage of the terms ‘designated landscapes’ and ‘protected landscapes’. We view ‘designation’ as the process of recognition of (national) importance. ‘Protected’ landscapes are those designated landscapes which have effective management in place to uphold the purposes for which they are designated.

A common basis for defining Wales' designated landscapes and seascapes

2.9. Accordingly we recommend the following as the common basis for the designation of all Wales' nationally important landscapes and seascapes:

“Landscapes and seascapes of national importance because of the quality and value of their natural beauty, wildlife and cultural heritage.

In this context

Natural beauty is;

Features and relationships formed by natural and biological effects, landscapes of natural beauty, Areas with wildlife and plants of scientific and conservation value, Geological and physical landforms and structures.

Cultural heritage is

Objects, features, sites, landscapes or associations, created by man which are part of our connection to the past, or contribute to the sense of place a location has by virtue of any combination of its archaeology, history, built environment science, traditions, art or ways of life.

Natural and cultural heritage therefore embraces not only the physical and visual but the intangible values or experiences associated with these assets Clear night skies and places where tranquillity can be experienced are as important as rare species or scheduled ancient monuments.

Collectively these qualities underpin their national importance of protected landscapes

A clear and common purpose that reflects the reality of designated areas as living and working landscapes and seascapes

2.10. The current purposes of designated landscapes focus solely on the conservation and the enhancement of natural beauty and in addition in the case of National Parks, the promotion of public enjoyment. At present however they do not reflect:

- a) the reality or expectations of those living in or using these working landscapes/seascapes
- b) the importance of managing the integrity of their natural resources in ways which create the widest possible range of public benefits
- c) the huge contribution these areas make to public well-being, the core ambition now being embedded into the Well-being of Future Generations Bill
- d) The important role protected landscapes play in promoting opportunities to enhance both local and national well-being.

2.11. It follows therefore that if a common definition exists for designated landscapes which recognises their national status, this should be complemented by **a common and unified purpose** recognised in statute, which acknowledges the manner in which these

special areas contribute to the delivery of those particular public benefits which they provide.

2.12. We, therefore, recommend a **Single Purpose** of designation, namely:

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

A unified purpose for Protected Landscapes which furthers the “Future Generations Wellbeing Goals” would enable these areas to help deliver:

- Increased economic prosperity
- Strengthen their environmental resilience
- Realise their full public health benefits
- Enable more people to enjoy them
- Make their communities more cohesive
- Encourage their distinctive cultures and the Welsh language to thrive

The aim of the unified purpose is to ensure that in sustaining the qualities and values of these areas, a range of social and economic activities should be promoted which enhance the well-being of that area, in ways that safeguard the integrity of the intrinsic qualities and values underpinning their designation [i.e. a refinement of the existing Sandford Principle].

2.13. This common purpose must however be achieved in ways that ensure that the outcomes which protected landscapes deliver;

- a) retain the integrity of the special qualities which make these areas nationally important
- b) ensure their natural resources are used in new and creative ways to increase economic prosperity and provide new employment opportunities in those areas
- c) continue to offer those forms of exceptional opportunities for recreation and enjoyment which are less likely to be found elsewhere
- d) fully respect the distinctive ecosystems values (tangible and intangible) associated with these areas when change occurs
- e) guarantee that the integrity and resilience of the resources in these areas are managed within those environmental tolerances thereby enabling the wellbeing benefits they provide, to be optimised
- f) recognise that current and future generations must share the benefits of these areas fully and equally.

2.14. This suite of anticipated outcomes therefore recognises not only the need to look after the inherent qualities of these special areas but in so doing, encourage those well-being opportunities which the special circumstances in each of these areas offers. Such a purpose should also more specifically embrace the needs of their local communities so that collectively protected landscapes can contribute to the agenda for both national and local wellbeing.

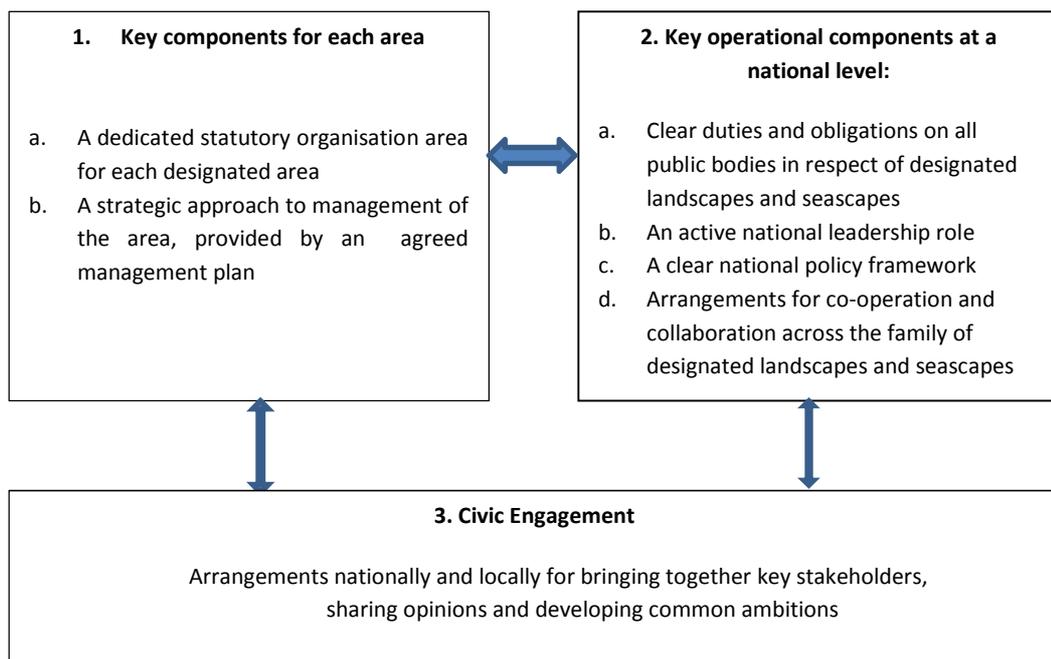
- 2.15. The range of activities which designated landscapes might be expected to deliver could therefore include creating new opportunities for farming and forestry, managing natural resource to mitigate the effects of climate change and promote more effective carbon and water storage , developing new recreation and tourism opportunities, enhancing the prospects for encouraging suitable business, appropriate employment and housing, helping to improve local service provision, as well as promoting a wider range of health, learning and personal development opportunities – all in ways that safeguard the integrity of their intrinsic qualities and values.
- 2.16. Adopting this approach we believe therefore builds on the current purposes and successes of National Parks and AONBs by refining and broadening them to reflect modern day circumstances. By so doing designated landscapes can contribute more to help remedy the increasing range of local and national social and economic challenges Wales faces in the future.
- 2.17. Our proposed “refreshed” system would also provide an appropriate Welsh interpretation of the sustainability and wellbeing approach necessary to characterise and manage all our nationally important cultural heritage areas, landscapes / seascapes or marine areas. In this context it is important that steps are taken through legislation to provide for the extension of existing National Parks and AONBs, as well as any newly designated areas, into the marine environment.

PART 3

THE COMPONENTS OF THE SYSTEM

3.1. We have identified components which we believe should deliver the outcomes associated with our suggested common purpose for designated landscapes and seascapes. These individual elements are illustrated in the diagram below represent the collective framework to deliver an integrated approach to the stewardship of these areas.

3.2. In suggesting this approach, we have assessed the present strategic and organisational arrangements which prevail in our protected landscapes against the desirable headline target outcomes, to establish whether they are appropriate and effectively in place and, if so, whether in today's Wales they are fully fit for purpose. We recognise that we are straying into governance issues associated with Phase 2 of the Review but we feel the system as a whole needs to be understood, especially how the national and local dimensions must interact and the importance of civic engagement in making such a system fit for purpose.



Each of these individual requirements is dealt with in the section below together with our suggestions for change.

1. KEY COMPONENTS FOR EACH AREA

a. **A dedicated statutory organisation for each area charged with safeguarding the qualities and opportunities within each area and overseeing and co-ordinating actions at the local level, which meet both national standards and also local requirements**

1.a.1. The current system provides for NPAs to look after National Parks but leaves it down to Local Authorities to determine how they wish to look after AONBs. Though there is provision for the creation of AONB Conservation Boards, this mechanism has not been adopted in Wales thus far. Whilst we contend therefore there is little need to change the current organisational system for AONBs and National Parks, we do recognise that there is a need for the creation of **bespoke arrangements** for managing areas identified in the future because of their national importance and where the NPA or AONB model would not necessarily be appropriate. This might apply for instance to those Heritage Coasts not currently in NPs or AONBs, seascapes or historic landscapes on the statutory register or to any area meeting our proposed definition of a nationally important landscape or seascape.

b. **A strategic approach to the planning and management of that area provided by an agreed management plan**

1.b.1. Those looking after designated landscapes are currently required to prepare a strategic Management plan for their area and in the case of National Parks to prepare a development plan. However, the current scope of management plans does not, for good reasons fully reflect the Government's proposed well-being agenda or specifically the comprehensive natural resource management approach needed for that area. Likewise there is no formal requirement for public bodies to participate in the preparation of the Plan and to agree to its content and further its aims.

1.b.2. We believe that in future, the plan for the management of an area should perform not only its current role but also act as the Well-being plan and Natural Resource plan for the area to achieve the full potential of the extended purpose we proposed in Part 2. This we suggest will need to be reflected in both the forthcoming Wellbeing of Future Generations (Wales) Bill and the Environment Bill.

1.b.3 The management plan for a designated area should provide a framework which helps guide the content of the development plan for the area. This function becomes even more important if the scope of management plans is widened to embrace "Well-being" and natural resource management.

1.b.4. We have already submitted evidence to the Welsh Government arguing that NPAs should continue in their role as Planning Authorities and we repeat it in the context of this Inquiry. This view was also taken by the Williams' Commission and in the Report by Land Use Consultants⁵ to the Welsh Government regarding this issue. We believe that the National Park Authorities, with their proven track record and all the relevant evidence still remain best placed to deliver the intricate integrated approach necessary to coherently link the planning and management of

⁵ "Delivery of Planning in Statutory Designated Landscapes in Wales", LUC for Welsh Government, 2012.

protected landscapes. Similarly the planning function for AONBs should be strengthened as recommended in the LUC report.

1.b.5. Equally we contend that if protected landscapes are to fulfil their full potential, the role of public bodies in the preparation and delivery of the Management plan will also need to be strengthened – see 2.a. below.

1.b.6. Likewise there is also a need for an improved and formal mechanism to bring together all the relevant stakeholders to pursue the well-being ambitions of the area (in the context of their special status and circumstances) to help in the formulation and implementation of the plan – see 3.a. below.

1.b.7. It also follows from our proposal that coastal designated areas should be extended to include the marine environment that their management plans embrace this extended area.

2. KEY OPERATIONAL COMPONENTS AT A NATIONAL LEVEL

a. **Clear duties and obligations on all relevant public bodies to participate in fulfilling the aims of the area as co-partners in the preparation and delivery of the plan for the area**

2.a.1. One of the most significant weaknesses of the present system, we suggest, is that the current duties on public bodies to have regard to the purposes of National Parks and AONBs are weak. There is no requirement for instance for them to:

- indicate how they might fulfil their duties in the context of existing protected landscape purposes
- report on what they have done in these areas and how their activities may have impacted on the purpose of that Protected Landscape.
- participate in preparing the plan, agreeing it or implementing its approaches and priorities.

2.a.2. The principle of having a foundation duty for public bodies to achieve well-being in the way they work is at the heart of the Wellbeing of Future Generations Bill and therefore needs to be formally translated fully into the circumstances prevailing in Protected Landscapes. We **recommend**, therefore, that:

- **all public bodies and statutory undertakers** involved with the well-being of designated landscapes [including those specifically responsible for co-ordinating the management of the area], are **required to address and demonstrate how their activities further the purpose of these areas**.
- a statutory requirement is introduced requiring public bodies and statutory undertakers to **participate** in the preparation of the plan for the area, **sign up** to it, indicate how they will **actively fulfil** their roles in the area, and **report** on how they have helped to deliver the Purpose of the designated area.

b. **An active national leadership role**

2.b.1. The Williams Commission highlighted a weakness of the present system as the lack of national leadership for protected landscapes. We **recommend** this leadership role should be fulfilled through the following range of functions being regarded as the norm:

- the provision of advice to Welsh Government on matters relating to the furtherance of the purpose of nationally important landscapes and seascapes
- the furtherance of the European Landscape convention principles in respect of Protected landscapes and seascapes
- keeping under review the designation system, bringing forward new areas for designation and the review of the boundaries of existing protected landscapes
- securing adequate funds from Welsh Government to further the purpose of designated areas
- distributing these funds to designated areas
- regularly monitoring the performance of the protected landscape system and the leadership achievements of those responsible for designated areas
- securing collaborative agreements with those responsible for managing designated areas
- promoting research and experiments and the sharing of knowledge about new approaches to natural resource management in designated areas
- increasing public awareness and understanding of the special qualities and public benefits nationally important landscapes provide
- establishing and maintaining International links with other protected landscapes

2.b.2. Given its current statutory duties towards National Parks and AONBs, we would expect Natural Resources Wales to take this leadership role. In practice it has not been evident that Natural Resources Wales, notwithstanding those statutory duties, has given any priority to designated landscapes. Its corporate plan makes no reference to this responsibility as being one of its priorities.

2.b.1. We **recommend** that Natural Resources Wales is mandated by Welsh Government to perform its statutory role in this respect and report annually on its performance in fulfilling a high profile protected landscape leadership role. We consider that this would be best achieved by establishing a dedicated unit, led at board level within that organisation which is properly resourced to fulfil this function. We believe that the only other acceptable alternative to this would be to set up a separate statutory organisation to play this fundamental leadership role, inevitably at greater cost and forgoing one of the advantages hoped for in setting up NRW.

c. **A clear and comprehensive National Policy framework which provides an enthusiastic focus and committed direction of travel for designated landscapes and seascapes**

2.c.1. Although there is a policy statement in existence for NPs, none exists for AONBs. The statement that currently exists gives guidance to NPAs but not to public bodies operating within them and therefore, is very limited in its scope.

2.c.2. We believe that much greater clarity is needed to demonstrate the role that designated landscapes can play not only in providing the benefits derived from their inherent qualities but also the numerous benefits they can provide for local and national well-being at present and in the future. In particular this statement should highlight how designated landscapes and seascapes can:

- contribute to the well-being of present and future generations both locally and nationally
- help deliver the sound management of our natural resources within their areas in ways which ensure that their integrity and resilience are retained and enhanced

2.c.3. We **recommend**, in particular, that a series of specific designated landscape well-being goals are developed, which reflect and are built around our suggested purpose which recognises the values of designated landscapes/seascapes.

2.c.4. We consider that such a national policy framework should provide the basis for the management plans prepared for each area. If it were clear and comprehensive it would obviate the need for a single Management plan covering all designated areas, a suggestion that has been expressed previously.

d. **Arrangements for co-operation and collaboration across the family of protected landscapes and seascapes**

2.d.1. Currently the NPAs come together as National Parks Wales and the AONBs are part of the National Association for AONBs. However, there is no established mechanism for bringing together all those directly responsible for managing this collection of protected landscapes. The need for greater collaboration and co-operation between designated areas in Wales was highlighted by the Williams Commission.

2.d.2. We **recommend** that the protected landscapes create their own network in the form of a small fleet footed [partly virtual] grouping. Informality and a 'can do' attitude should be the essence of its work. It would serve to ensure:

- greater collaboration of thought and deed
- the co-ordination of bids for funding
- the sharing of skills and experience
- the promotion of joint initiatives within the family or with other stakeholders
- the implementation of collaborative research and experiment

- the promotion of collective international links
- the opportunities for staff exchanges and even a professional development career path.

We consider that such an arrangement would demonstrate and promote more cost effective and value added ways of achieving collaborative partnership working.

3. CIVIC ENGAGEMENT

a. Arrangements nationally and locally for bringing together key stakeholders, sharing opinions and developing common ambitions

3.a.1. The involvement of local people and organisations in the preparation of the Management plan for the designated area and its subsequent implementation is crucial, particularly if its scope in future is to embrace all aspects of “Well-being”. Such a grouping would help to secure a sense of ownership and understanding of the role and purpose of the designated area.

3.a.2. No formal arrangements exist nationally to bring key stakeholders together with the managers of protected landscapes to consider the challenges and opportunities facing these areas. Similarly there are no formal arrangements locally for bringing stakeholders together in each designated landscape to address the needs of the area in terms of how to achieve its Purpose. AONBs have shown the way in the composition of Joint Advisory Committees and AONB Partnerships involving local organisations including the likes of farmers and landowners, those with conservation interests and the NGO sector.

3.a.3. We **recommend** that:

- **at a national level** whichever national organisation provides a leadership role for Protected Landscapes should be mandated to establish a **National Stakeholder Forum**, to facilitate its work and to report on its achievements
- **at a local level** a formal **Stakeholder Advisory group** is formed for each designated landscape by those responsible for its management.