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13th May 2015

Review of Designated Landscapes in Wales, Part 2

To Professor Marsden and other members of the review panel

The Cambrian Mountains Society (CMS) welcomes this opportunity to contribute to part two of the Independent Review of Designated Landscapes of Wales. In our Part One submission the Society provided you with brief details of its membership and objectives but if you require further details they can be found on our websites (see header). We draw your attention, in particular, to our Strategy document; *Cambrian Mountains-The heart of Wales Developing a Strategy for a Sustainable Future.*¹

CMS's membership (of around 350 in total) are passionate in protecting the outstandingly beautiful landscape of the 'Cambrians' and are resolute in achieving the recognition that these hills richly deserve. The Cambrian Mountains would have achieved this recognition in 1973 but for the Secretary of State for Wales refusing to confirm the designation order, or even set up a public inquiry into the case. The Society is still convinced that this decision was a 'political' one rather than one based on the acknowledged beauty of these hills. As your report from Part One (4.6.4 & 4.6.5) of the Review points out, there is still "unfinished business" as far as new designations in Wales are concerned.

Comments on Part One Recommendations

CMS broadly agrees with your recommendations from Part One of the Review. We are convinced that 'a one size fits all' approach to Wales' Protected Landscapes does not treat the Nation's rich, but diverse, mix of special landscapes fairly. We agree that NPs and AONBs should remain as distinct designations, but perhaps with more collaboration between the organisations' governance and management teams.

1. <http://www.cambrian-mountains.co.uk/wp-content/uploads/2014/01/cambrian-mountains-sustainable-future.pdf>

We, however, are less convinced about (but not opposed to) the name change from ‘Area of Outstanding Natural Beauty’ to ‘National Landscape of Wales’. Just like National Park, AONB has become a well respected ‘brand name’. The strap-line adopted by AONBs of ‘Landscapes for Life’ we think is also very appropriate for a forward-looking landscape conservation initiative.

Turning to our comments in Part One over the perceived hierarchical position of NPs and AONBs we find your recommendation to have just one set of Statutory Purposes for all of Wales’ Protected Landscapes as a very positive move and we recognise that the economic benefits of designation have received insufficient attention. The Society also feels that the remit being broadened to cover the Conservation, Human Well-being and Sustainable Resource Management Purposes as consistent with emerging ideas on landscape scale conservation. CMS, as can be seen in our strategy document, have been promoting very similar ideas for the Cambrians for some time. The Society agrees that in interlocking the three purposes Wales’ Protected Landscapes will not be “left behind”. We do, however, feel it vital that the ‘Sandford Principle’ is upheld with the Conservation Purpose outranking the latter two when in conflict. Of course, widening the remit of National Park Authorities and AONBs’ JNCs has cost implications and these fiscal responsibilities, we feel, must be considered by both the Review and WG.

The Society is aware that new designations are not within the brief of the Review but we consider that the Cambrian Mountains, as LANDMAP regional landscape character area 21, are a very good trial ground for your recommendations. The Society hopes that NRW also see merit in the Cambrians for testing its ideas on Natural Resource Management (NRM). With its, extensive blanket peat lands, mixed woodlands, and traditional hill farms, as well as large river catchments, the area holds a wealth of Natural Capital.

CMS consider that your recommendations would be best trialled in an area designated as an AONB but that there may be other models worth considering. One may be an adaptation of the French Parcs Naturels Régionaux (PNRs)² but with a much more formalised charter, membership and funding arrangement. The Society has held promising discussions with the Cambrian Mountains Initiative (CMI) and WG’s Sustainability Commissioner, Peter Davies, about such a possibility and believe it may be a way forward with a trial in the Cambrian Mountains. Ultimately though, CMS consider that areas such as the Cambrian Mountains (and the Denbigh Moors) identified by Hobhouse in 1947, should eventually achieve designation as Protected Landscapes with IUCN Category V status. Also, as the whole of the UK signed up to the *European Landscape Convention*³ then it is only proper that areas well recognised as being of special quality should ultimately be brought into the family of Protected Landscapes.

2. <http://www.parcs-naturels-regionaux.tm.fr/en/parc.UK2.pdf>
http://www.coe.int/t/dg4/cultureheritage/heritage/Landscape/default_en.asp

Response to Part Two of the Review

Firstly can we remind you of the Society's response to Part One of the Review (paragraph 4, page 3 - reproduced below) in which we point to governance arrangements in various Protected Landscapes across the UK.

CMS is also aware of the different Governance arrangements across NPs and AONBs together with participation in planning control within the two designation types. It feels that this also may have helped in promoting the hierarchy described above. The Society considers that some element of participation by the governing body in planning control within each Protected Landscapes is important. The Society suggests that the Review looks at the governance arrangements in the Cotswold and Chiltern AONBs in which their Conservation Boards, drawn from both local representatives and national appointees, have an advisory input into planning matters within their respective areas. The Society also recommends that the panel examines the governance arrangements in the two relatively recently created Scottish National Parks. In both the Cairngorms and Loch Lomond /Trossachs NPs planning control lies within a partnership between the National Park Authority and relevant Local Authorities. Of course the aims of Scottish National Parks have a wider remit than those 'south of the border', actually formalising their socio-economic duties. Also worth mentioning here are the governance and planning responsibilities of the newly created NPs in England such as the South Downs NP.

Question 1 (The 'Grand Challenge')

CMS considers that the governance arrangements that have evolved for the National Parks largely work. We do, however, feel that apart from Board Members representing Local Authorities and those nominated by WG there should also be Members directly elected by the public. These might be canvassed from interested parties such as NP Societies, The Open Spaces Society, The Ramblers and the CLA, but not forgetting inviting those individuals who are just passionate about their NP. We do not consider any form of amalgamation of the three NP Authorities as appropriate as each Park has a very different character, and alongside this, issues that only a largely locally based board can address. Board meetings could have non-voting expert representation from NRW and also 'guest' board members (again non-voting) from other Welsh Protected Landscapes. To ensure that our NPs build on their reputation as international exemplars of conservation and sustainability, working within their proposed expanded purposes, they must retain full Planning Authority status. If WG is successful in reducing the number of Local Authorities (which CMS supports) then it is important that NPs retain their local powers within these much larger geographical authorities.

Again CMS are supportive of the present governance arrangements in AONBs, indeed it is one of the reasons we favour AONB status for the Cambrians rather than reviving the campaign for NP designation. It is true that AONBs tend to cover much smaller areas than NPs and as such could not expect to have the equivalent of LA status. In the case of the Cambrian Mountains, however, when they achieve designation it will be amongst the largest AONBs in the UK. In our Part One response (see below) we did point to the Chilterns and Cotswolds AONBs, both large, and which are both governed by Conservation Boards. The Society see this as a possibility for the Cambrian Mountains AONB or indeed, in the interim, Cambrian Mountains PNR. The Society also asks the Review Panel to consider the possibility of the governing bodies of all Protected Landscapes having the benefit of advice from an Independent Landscape Advisory Panel. This may be of

particular importance if new Welsh designations are considered and would ensure that Local Authorities were under a statutory duty to consider the purposes of Protected Landscapes.

Question 2

That Wales holds large swathes of outstandingly beautiful countryside is without question, far more than the approximately 25% presently designated as either a NP or AONB. In the long term we hope that further areas achieve designation and in particular the Cambrian Mountains – one of the few areas that Hobhouse identified that has not yet achieved Protected Landscape status! If this is to be via an interim regional park scheme then WG should quickly amend the Environment Bill to include this possibility. The Society also considers that WG should be taking greater account of the former CCW's excellent GIS system 'LANDMAP' in identifying both new areas for designation as well as in continuing to extend existing designations. The 'Pathfinder Report – Testing the Appropriateness of Designation' did recommend reviewing the boundaries of designated land periodically, presumably using LANDMAP as a tool.

Question 3

In our opinion NRW seem to have had their powers of landscape guardianship stripped away from them. As we suggested in response to Q1 an Independent Landscape Advisory Panel could be set up for each AONB and NP, or for financial expediency, for Wales' Protected Landscape family as a whole. This may go some way to redress the problem.

Question 4

The Society would like to give two very different responses to this question.

Firstly the economic benefits of Protected Landscape status are undeniable for instance for Wales' NPs

1. Wales' National Parks account for over half a billion pounds of Wales' Gross Value Added, representing 1.2% of the Welsh economy.
2. Nearly 30,000 people are employed within the park boundaries. Of the jobs provided within the Park, 38% are linked to the environment.
3. The Parks receive 12 million visitors each year spending an estimated £1bn on goods and services

From page 10 - The Socio-economic Benefits of New National Park Designations in Scotland, March 2015 <http://www.scnp.org.uk/News/Docs/2015/SCNP-socio-economic-Report.pdf>

and an example from an AONB - a press release covering a visit by John Griffiths AM, the then Minister for Environment and Sustainability, as he visited the Clwydian Range and Dee Valley AONB on its first birthday;

'The outstanding landscape of the original Clwydian Range AONB is a major factor in attracting tourists to the area. InSPACE2006 rural Denbighshire enjoyed 1.58 million day visitors and 365,000 overnight visits. The total revenue from tourism in Denbighshire is more than £91 million, with a rural visitor economy supporting 1,770 jobs.'

Secondly, with a greater input into planning control within AONBs the governing bodies may be able to give effective guidance about inappropriate developments such as out of scale wind turbines and enormous lambing sheds being built.

Question 5

We have hopefully addressed this question as to other governance models earlier in this response, notably on page 2, paragraph 4 and in our answer to Q1. We do, however, think that this is an appropriate point to return to two issues which we did raise in our Part One response.

- i. Are other landscape designations, even though they are not statutory, being reviewed by yourselves? We are thinking here of designations such as 'Heritage Coasts' and 'Historic Landscapes.'
- ii. Does WG have the powers to amend the National Parks and Access to the Countryside Act, 1949?

In this response CMS hopes that it has explained its position as to the future governance of Wales' Protected Landscapes. The Society is convinced that the Cambrian Mountains would be a highly suitable area in which to trial evolving ideas on landscape scale conservation, its management and governance. We hope that you find our comments useful. In order to expand on any points raised we would be happy to meet with the panel. In this regard we enclose a response from the Carl Sargeant, Minister for Natural Resources, in which he suggests such a meeting. Perhaps this could be widened to include Peter Davies speaking from both his role as Sustainability Commissioner for Wales and also as spokesperson for CMI. We recognise that CMI has a different remit to ours, but both organisations would like to see some form of recognition for the Cambrian Mountains at least along the lines of some form of pilot area in the very heart of Wales.

Yours faithfully

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