



Llywydd/President: Iolo Williams

Cadeirydd/Chairman: Ann West annwest@spamarrest.com

Gwefan/Website: www.mynyddoeddcambria.org.uk / www.cambrianmountains.co.uk

Taking the Long View (Policy Statement for Protected Landscapes in Wales)

Consultation Document number: WG18798

Comments from the Cambrian Mountains Society

Dated: 5th September 2013

The Cambrian Mountains Society (CMS) welcomes the opportunity to comment on the consultation document: *Taking the Long View*. The Society sees this document as an important recognition by Welsh Government that the twin designations of Area of Outstanding Natural Beauty (AONB) and National Park (NP) do much to protect Wales' most outstanding landscapes. The document recognises that both designations have as their binding principle, the conservation of natural beauty but that it also makes a case for the important contribution that both types of protected landscape make in building a more resilient and sustainable future for Wales. In our opinion all of this family of 'Living Landscapes' deserve the very highest levels of protection, without any diminution of the 1949 *National Parks and Access to the Countryside Act* which led to the creation of NPs and AONBs throughout England and Wales. The Society sees much to commend in *Taking the Long View* but it does have some concerns in that the policy restricts its attention to only the existing Protected Landscapes in Wales. CMS suggests that the draft Policy Statement is rather limited and that it be amended to consider landscape issues in Wales more comprehensively. Only then, in our opinion, will the Minister's Vision of 'addressing the long term challenges facing people and the environment' be met.

CMS was established in 2005 and now has a membership of just under 400, representing people from many backgrounds but all with a common interest in the future of the Cambrian Mountains. It seeks to encourage cooperation across the three Unitary Authorities (Powys, Ceredigion and Carmarthenshire) which happen between them to span what is in reality a single geographical entity. (LANDMAP, Regional Landscape Character Map for Wales Area 21).

The objectives of the Society focus on promoting, for the benefit of local communities, and the wider public, measures which will sustain or enhance the landscape, natural beauty, biodiversity, archaeology, scientific interest and cultural heritage of the Cambrian Mountains. The Society has examined several models that might help to bring about these objectives but our preferred option is still to see the area designated as Wales' next AONB. We are, however, quite flexible with our boundaries for the proposed AONB and could see some advantage in now including surrounding townships within the designated area. Over the last few years we have had meetings with, amongst others, the following bodies to persuade them of our vision for the 'Cambrians':

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- Councillors and Officers of Powys, Ceredigion and Carmarthenshire Unitary Authorities (2012 -2013),
- AMs at a presentation in the Senedd, hosted by Kirsty Williams (January 2009),
- MPs and members of the Upper House at a Westminster presentation (October 20011).

We have also recently (July 2013) discussed our ideas with Prof. Peter Matthews, Chairman of Cyfoeth Naturiol Cymru (Natural Resources Wales) alongside Tim Jones the body's Executive Director North and Mid Wales.

For further details of the Society's vision for the Cambrians please see our strategy document: *Cambrian Mountains – The Heart of Wales: Developing a Strategy for a Sustainable Future*. This can be found on: <http://www.cambrian-mountains.co.uk/documents/cambrian-mountains-sustainable-future.pdf>

In particular we want to see in the Cambrian Mountains a strategy that will provide greater protection of this outstanding landscape with a thriving community rather than an upland economy that is forever dependent on the goodwill of urban society.

Specific comments on the Consultation Document.

The Society sees much to commend in the discussion document and we are of the opinion that it will help to promote discourse on both the future of Protected Landscapes and in the building of a more sustainable economy for Wales. We would, however, like to raise several points, the first concerning the final three paragraphs of the document which promote the idea of 'more experimental approaches to National Park management'. At present NP management includes representatives from both the local community and others with wider interests. We consider that this system has served these designated areas well, producing a family of internationally respected Parks. If recommendations from Paragraphs 53, 54 and 55 of the document are put in place then CMS can see many areas of conflicting interest between the Welsh Government's strategic planning framework and that of Localism. This surely cannot help the Park Authorities trying to care for the Nation's most beautiful landscapes.

CMS supports Welsh Government's developing policies on Sustainability and the Environment. We acknowledge that these policies are much influenced by the 'ecosystem approach' to conservation, an approach that we think has much to offer. We are, however, worried that too much emphasis in the present document is being placed on the provision of certain secondary ecosystem services by our Protected Landscapes. CMS maintains that the very foundation stone of both NP and AONB designation, from the 1949 Act, is based on the protection of natural beauty. The Society also fully supports the other aims at the very heart of designation in providing opportunity for outdoor leisure and having regard for those that live and work in the area, but we do take issue with the 'multiple outcomes and functions' alluded to in Paragraphs 14 and 15 of the document. Whilst these outcomes and functions may well be of benefit to the Protected Landscape in question, and the country at large, they must be regarded as being added bonuses and not drivers of landscape conservation. As such we commend to WG the work of the Pumlumon Project, www.mont.co.uk/Pumlumon.html an ecosystem or landscape approach to conservation already underway in the Cambrian Mountains. Two other organisations working at the landscape level of conservation in mid Wales are the Elan Valley Trust and the National Trust with their Abergwesyn Commons project. In our opinion, just like the Pumlumon Project, both of these excellent schemes give a high priority to conserving and enhancing the natural beauty of the 'Cambrians'.

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Next we would like to point out what we consider to be a dichotomy between the Sandford Principle of Paragraph 22 and the Silkin Principle of Paragraph 32. The former states that conservation holds priority over all other purposes whilst the later suggests that major developments may be allowed in AONBs and NPs providing the proposals pass rigorous examination. In our opinion the tests applied in this later Principle must be extremely rigorous if our Protected Landscapes are to remain free from inappropriate development.

We note your comment in Paragraph 35 relating to the large renewable energy capability of designated landscapes. We would expect such a statement to be supported by firm evidence relating to each of the many technologies you have in mind. In our opinion no amount of 'careful management' will mitigate the effects that large scale energy developments will have on our most precious landscapes. Small scale renewable energy projects within these landscapes may have a role in supplying energy for the local community but they should be subject to similar rigorous environmental impact assessments as larger schemes. This must include their contribution to any cumulative effect on the surrounding countryside. Linked to this greater use of the impressive LANDMAP GIS system, developed by the former Countryside Council for Wales (CCW), should be made in granting permission for both large and small developments in the landscape. We also think that considerable thought has to be given in allowing wind turbine developments, large or small, within carefully mapped buffer zones surrounding each AONB and NP.

Apart from considering the issue of energy security Paragraph 35 also considers the challenge of climate change. Here the forthcoming Policy Statement should do more to highlight other important 'softer' ecosystem services provided by the moorlands and wooded areas which clothe large areas of our AONBs and NPs. Future policies should do more to recognise the important role that these areas provide in carbon sequestration and flood control.

Moving on we can find no reference in the document as to the mechanisms Welsh Government will use in the future to promote further areas into protected status. We see the establishment of a Cambrian Mountains AONB as an important means of achieving in Mid Wales that region's contribution to the Welsh Government's vision of a sustainable Wales. There needs to be clarification of responsibilities within Government for consideration of this, and other possible candidate areas, for promotion to AONB status. We also suggest that the forthcoming Environment Bill includes details of how it will set in place the means for continual review of all AONBs and NPs in Wales. Here, we suggest the CCW report; *Pathfinder Testing the Appropriateness of Designation* published in March 2009 may be useful. Whilst CMS does realise that Welsh Government also has to oversee a large network of designations in such fields as; biological, marine and heritage conservation we feel that any simplification in their governance and day to day running will be to their detriment. When the Convention on Biological Diversity set up the twelve core Principles of the 'ecosystem approach' in 1995 it acknowledged that its success lay in coordinated work across the countryside. For the approach to be successful conservation activities must continue at both the species and habitat level as well as at the landscape level. In our opinion taking on board the 'ecosystem approach' should not be used as justification for economising on such designations as National Nature Reserves (NNRs) and Sites of Special Scientific Interest (SSSIs).

In conclusion CMS are broadly supportive of the views expressed in *Taking the Long View* but hope that our comments in this response will help in finalising Welsh Government's revised Policy on Protected Landscapes. We hope that you can see that our priority is in how the Policy deals with expanding the family of 'Living Landscapes' in Wales, especially the

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inclusion of the Cambrian Mountains as an AONB, a status we believe it richly deserves. CMS are keen to be included in any discussions that affect the landscape, natural beauty and well being of those that live and work in rural Wales and would ask that we are kept up to date with any future consultations that Welsh Government intends to hold in these areas.

Yours

Mrs. Ann West. Chairman The Cambrian Mountains Society.

The Fron,
Cregina,
Powys
LD1 5SF. Tel: 01982 570244