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Review of Designated Landscapes in Wales.

To Professor Marsden and other members of the review panel

The Cambrian Mountains Society (CMS) welcomes this opportunity to take part in the Independent Review of Designated Landscapes in Wales. CMS was established in 2005 and now has a membership of around 350, representing people from many backgrounds but all with a common interest in the future of the Cambrian Mountains. 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 looked closely at several models that might help to bring about these objectives but still believes that the area should be allowed its rightful position within the family of Wales' Protected Landscapes. Whilst the Society has been focusing its campaign on achieving AONB status for the 'Cambrians' it is very aware that the area was indeed designated as a National Park in 1973 but that the then Secretary of State for Wales refused to confirm the Order, or even hold a public enquiry into the case.

In the response below CMS sets out its views as regards to;

- A. the purposes of designated landscapes, both NPs and AONBs,**
- B. the merits of bringing Wales' Designated Landscapes under a single type of designation.**

The Society asks that it also be allowed to expand on the views presented below at the evidence-gathering sessions later this month. In addition, CMS is concerned that the planned public engagement workshops will only be targeted at locations in or near existing Protected Landscapes. The Society believes that Protected Landscapes are a national asset and as such workshops should be held across the whole of Wales.

A. The purposes of designated landscapes.

CMS understands that both Wales' NPs and AONBs are IUCN Category V Protected Areas. The Society sees the IUCN's definition¹ for these areas as strong and sitting comfortably alongside the National Parks and Access to the Countryside Act (1949) as well as the CRoW Act (2000).

1. A protected area where the interaction of people and nature over time has produced an area of distinct character with significant ecological, biological, cultural, and scenic value and where safeguarding the integrity of this interaction is vital to protecting and sustaining the area and its associated nature conservation and other values.
www.iucn.org/about/work/programmes/gpap_home/gpap_quality/gpap_pacategories/gpap_category5

The Society also considers that both types of Wales' Protected Landscape sit well in CCW's interpretation of Natural Beauty which they derived from a study they commissioned – 'On the meaning of Natural Beauty in Landscape Legislation'² (2010) from the White Rose University Consortium.

The 1949 and CRoW Acts allowed areas to be designated on account of their natural beauty and, in the case of NPs, the opportunities they offered for outdoor recreation. Despite not being part of AONBs' remit the public today also enjoy a range of outdoor pursuits and quality time provided by these landscapes for life. With AONBs providing such a rich mix of leisure activities this must add considerably to the health and wellbeing of both visitors and 'locals'. Alongside leisure and tourism, projects such as the Clwydian Range AONB's 'Heather and hillforts' also attract additional funding into each area. AONBs are, indeed, very successful in attracting significant additional non-exchequer funding with an average multiplier of around 3 – therefore for every £1 of exchequer funding an additional £3 is levered from other sources. Our AONBs have thus evolved into 'Parks' as well as important economic drivers in some of Wales' most valued landscapes. Just like NPs they are playing a vital role in the sustainable future of rural Wales. CMS also believe that farmers within Protected Landscapes should be awarded additional points in agri-environment schemes, promoting conservation as well as providing financial support for this vital sector of the rural community.

That the Welsh AONBs are successful can be seen in the recent extension of the Clwydian Range AONB, to include parts of the Dee valley. John Griffiths AM, the then Minister for Environment and Sustainability, whilst visiting the extended AONB on its first birthday in 2012 said; "*Today's visit is an excellent opportunity for me to speak to the Joint Advisory Committee about how their management of the area is progressing. Both the Committee and I are committed to ensuring that the area delivers the very best outcomes for Wales, and that its beauty, varied landscapes and rich mix of wildlife and habitats are maintained.*". The linked news alerting service³ went on to highlight the importance of the visitor economy to the AONB.

The actual extension to the Clwydian AONB came about after CCW published their report; 'Pathfinder -Testing the Appropriateness of Designation'⁴ (2009) which not only considered the Clwydians but also other part of Wales. CMS would like to commend this Report and still sees it as providing very good guidelines for tackling future designations. The Society notes that the report points out the weaknesses in the 'integrated rural development initiative for Cambrian Mountains'. CMS is also very sceptical over recent ideas to nominate the Cambrians as something akin to a French 'Parc Naturel Régional' (PNR). Whilst PNRs may address some of the wellbeing issues in areas such as the Cambrians they relegate the conservation and enhancement of natural beauty to a poor second. The Society is firmly of the view that the Review must examine the possibility of new designations either as AONBs or NPs and this should include looking at the criteria and procedures used for judging an area's suitability. Here CMS still considers the former CCW's 'Landmap' as an important tool in identifying landscapes suitable as new designations or extensions to those already demarcated.

2. "In the context of 'protected landscapes/seascapes', we conclude that natural beauty relates, first and foremost, to unspoiled rural areas, relatively free from the effects of urbanisation and industrialisation. It does not apply only to landscape where nature may appear to dominate but includes rural landscapes which have been shaped by human activities, including, for example farmland, fields and field boundaries, designed parkland, small settlements, larger villages and small towns, provided that they are integral to, and in keeping with, the character of the 'landscape'. Overall, therefore, it appears that the concept of natural beauty retains a contemporary meaning distinct from the evolving use of 'landscape' and continues to have legal and policy relevance." Page 31
http://eprints.whiterose.ac.uk/11121/2/selmanp_natural_beauty_paper.pdf
3. The outstanding landscape of the original Clwydian Range AONB is a major factor in attracting tourists to the area. In 2006 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 the rural visitor economy supporting 1,770 jobs.
<http://www.wired-gov.net/wg/wg-news-1.nsf/0/3879A5844E7BF82A80257AB80031F591?OpenDocument>
4. 'Pathfinder Testing the Appropriateness of Designation'. CCW Research Contract (2009) Can be accessed via -
<http://cambrian-mountains.co.uk/wp-content/uploads/2014/01/aonb-pathfinder-report.pdf>

It is in the above context that CMS draws to your attention a recent statement from Ceredigion County Council⁵, *“The landscape of the Cambrian Mountains is cherished and of high quality. In many respects this area has greater quality than a national park for it has landscape of national park quality but is not the honey pot that national parks have become. It therefore retains that wild and deserted quality.”* Surely any review of Protected Landscapes has to consider the possibility of further designations for areas such as the Cambrians.

CMS also sees much to commend in WG’s consultation document ‘Taking the Long View’⁶ (2013). New thinking involving the ecosystem or landscape approach to conservation will undoubtedly have a bearing on how Protected Landscapes are managed. AONBs, with their nimble, local community-based governance, should be able to implement the latest ideas from ‘the Long View’ and the forthcoming Environment Bill relatively easily.

Unfortunately, in the view of CMS, many now see a hierarchy within the Protected Landscape family with NPs being superior to AONBs. The 1949 Act did not intend this and in terms of landscape quality rated both as of equal merit. In the Society’s opinion it is largely due to the formal duty of providing recreational facilities in NPs that this hierarchy has come about. Now that AONBs clearly provide so much in the way of outdoor leisure facilities, alongside initiatives to improve social and economic resilience, this perceived hierarchy is misleading and needs to be addressed. In the Society’s opinion AONBs are today leading exemplars of sustainable development in rural communities. Each AONB’s management plan draws together objectives that not only protect its natural beauty and biodiversity but also to benefit the local economy.

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.

Moving on to Heritage Coasts. Although there are two stretches of these special coastlines which do not lie within an AONB and may not be part of the brief of this Review it should not be forgotten that Sir Arthur Hobhouse (1947) did suggest that parts of both the Glamorgan and Ceredigion coastline be designated as Conservation Areas. This should have given them the same status as areas which were subsequently designated as AONBs. It is an anomaly that those Heritage Coasts that lie within NPs or AONBs now have statutory protection but those outside do not. Looking more locally both Ceredigion and Carmarthenshire County Councils have defined large parts of their uplands as Special Landscape Areas (SLAs). Whilst CMS commends them on this, and their linked Special Planning Guidances (SPGs), the Society feels that AONB designation would be much more effective in protecting both the whole area’s natural beauty as well as promoting residents wellbeing and sense of place.

5. Ceredigion County Council (2014). Representation to the Mynydd y Gwynt Wind farm proposal. National Infrastructure Planning website. <http://infrastructure.planningportal.gov.uk/projects/Wales/Mynydd-y-Gwynt-Wind-Farm/>
6. ‘Taking the Long View’ WG consultation document WG: 18798 <http://wales.gov.uk/docs/drah/consultation/130628protectlandscapedraften.pdf>

B. The merits of a single type of designation.

CMS considers that both types of designation for Protected Landscapes in Wales have worked well over the years and should not be markedly changed. Here the Society would like to draw the Review's attention to 'Pathfinder' page 3 which asserts that, '*AONBs have demonstrated their ability to address those forces (for change) through partnerships driven by an AONB unit*'. NP and AONB governing bodies have worked to improve the wellbeing of both their present and future residents whilst also, most importantly, working within the conservation aims and objects for their respective designation. In short both NPs and AONBs have strived to maintain a sense of 'Bro' for their area. A 'one size fits all' policy is unlikely to work in the complex quilt of Wales' outstanding landscapes. It is the Society's opinion that this question in the review must not be promoted for financial expediency and political lobbying rather than for the guardianship of Wales' most precious asset. Particularly now that CCW's functions are incorporated into NRW details, including specifying criteria and procedures, for possible new designations need to be set out by Welsh Government. If WG go down this route care will be needed when considering the position of the Wye Valley AONB with it straddling the Welsh/ English border. CMS is also uncertain that Welsh Government has the legal powers to alter UK Protected Landscape legislation.

In this response CMS hopes that it has set out its position as regards to Wales' Protected Landscapes. The Society is, however, prepared to listen to and consider new ideas on caring for the Nation's outstanding countryside. In conclusion the Trustees of CMS feel that they can provide an important input into the Review on behalf of many people living and working in mid Wales.

Yours faithfully

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