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19 September 2013

Dear Sir/Madam

**The Campaign for National Parks' Response to "Taking the Long View: Consultation on the draft Policy Statement for Protected Landscapes in Wales"**

**Introduction**

1. As the independent voice for National Parks, the Campaign for National Parks (CNP) Cymru welcomes this opportunity to comment on this consultation document and trusts that our comments prove helpful in developing the final version of this important policy statement.
2. The Campaign for National Parks has been in existence for over 75 years and is the charity that campaigns to protect and promote National Parks in Wales and England as beautiful and inspirational places enjoyed and valued by all. CNP Cymru represents the interests of third sector bodies such as the three National Park Societies in Wales and other bodies such as CPRW (Campaign for the Protection of Rural Wales), Ramblers Wales and the National Association for AONBs (Areas of Outstanding Natural Beauty). The three National Park Authorities in Wales and National Parks Wales have observer status.
3. CNP Cymru believes that National Parks should be maintained as distinctive and unique tracts of countryside, which are also adaptable and resilient to future pressures such as climate change. The draft Policy Statement will need to be strengthened and made clearer in order to achieve this, and if it is to provide a strategic policy framework for AONBS and National Parks in Wales.
4. Our response to the specific consultation questions is included below. There are aspects of the draft document that we welcome such as the recognition of the importance of the planning system providing special protection for designated landscapes and the emphasis on social inclusion and partnership working. However, there are a number of significant omissions and other aspects which need to be amended if the final

document is to provide the guidance needed to ensure that protected landscapes fulfil their statutory purposes and contribute to a sustainable Wales. In particular, there is:

- Insufficient information on the nature and importance of protected landscapes and their special qualities and a lack of clear information on the similarities and differences between National Parks and AONBs.
- A lack of information as to how the principle of sustainable development will integrate with the current statutory purposes of protected landscapes and how this will affect the management of these areas in future.
- No vision of how the special qualities of protected landscapes will be enhanced.
- A lack of clarity about the role of National Parks in the new natural resource management approach and in particular the links between National Park Management Plans and natural resource management planning.
- Insufficient detail about the role of Natural Resources Wales with regard to protected landscapes.
- A lack of outcomes which are specific to protected landscapes rather than of general relevance to rural Wales.

5. These issues are dealt with in more detail below in response to the consultation questions. However, we wanted to start by highlighting some of the evidence about the importance of Wales' protected landscapes which we believe needs to be reflected in the final version of the policy statement.

6. National Parks contribute significantly to the well-being of the nation, through protection of the landscape, wildlife and key environmental resources and services, like water provision and carbon storage in peat soils and forests, which can mitigate the effects of climate change. National Parks are also inspiring spaces for people to enjoy and improve their health and well-being, whilst making a significant contribution to the economy through tourism, farming and other related businesses. Recent research for National Parks Wales found that overall, the economies of the three Welsh National Parks account for £557 million Gross Value Added and their environments directly support 10,738 jobs within their boundaries and a further 2,033 jobs across Wales<sup>1</sup>. The same research also found that the three Parks receive 12 million visitors per annum who spend an estimated £1 billion on goods and services each year.

7. Not only does the high quality environment in these areas make a significant contribution to the tourism economy but it also contributes to a wide range of other objectives by acting as a source of health, well-being and spiritual inspiration. This ranges from tackling climate change and

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<sup>1</sup> Figures from a research report by Arup included in National Parks Wales' submission to the Commission on Governance and Delivery of Public Services in Wales 2013.

improving biodiversity to enhancing cultural heritage and encouraging physical activity by promoting access to recreational networks.

8. National Parks are also highly valued by the public. A UK representative survey commissioned by the UK Association of National Park Authorities in 2012 into the awareness and opinions of National Parks<sup>2</sup> found that almost all respondents thought that it was important to protect areas of the countryside from development.
9. Many of the benefits which National Parks provide, including tourism and rural economic growth, would be lost if anything were to detract from the special qualities for which they are valued. This means that it is crucial that the conservation and enhancement of these special qualities is at the heart of this policy statement. It is also essential that the policy statement includes a recognition and understanding of why protected landscapes must be managed differently if they are to continue to deliver these benefits.

### **Responses to consultation questions**

#### **Question 1: Do you think this policy document adequately positions Wales' protected landscapes to play a central role in taking forward a vision for a sustainable Wales?**

10. This document contains many statements with which we agree. For example, we particularly welcome the recognition of the importance of the planning system providing designated landscapes with 'the highest possible protection from inappropriate development' (para 31), the role of National Parks as 'icons for tourism' (para 33 and 47) and the emphasis on social inclusion in paras 43-46 which supports the work of our Mosaic project. We also welcome the mention of the Sandford principle in para 22 and the strong emphasis on partnership working and the role of the voluntary sector in the section on delivery.
11. However, overall we do not believe that the policy document adequately positions Wales' protected landscapes to play a central role in taking forward a vision for a sustainable Wales and it does not provide an adequate framework for the future management of these areas. This is very disappointing given the contribution that National Parks and AONBs could make to sustainable development and the ecosystem approach.
12. One problem is the way in which the document deals with the similarities and differences between AONBs and National Parks. Although the broad principles relating to both should be the same since they are both areas that have been designated for their landscape value, there needs to be a recognition that the way in which they are managed is different.

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<sup>2</sup> MG Clarity, National Parks Survey, UK Association of National Park Authorities, December 2012.

13. There also needs to be a greater distinction between what protected landscapes are in terms of their special qualities (i.e. natural beauty, wildlife, heritage etc) and the way in which they are managed (i.e. NPA or AONB Joint Committee).
14. There are a number of other areas where the document could be strengthened to ensure that protected landscapes can play a central role in a sustainable Wales, as set out below.

#### ***The 'have regard' duty***

15. We welcome the reference in para 6 to the duty of public bodies to have regard to the statutory purposes of designated landscapes and to NRW's role in promoting and monitoring this duty. However, we would like to see this reference strengthened by repeating the clear obligations which are included in the previous policy document and the relevant section of existing legislation. This duty also needs to be highlighted later in the paper, particularly in relation to the guiding principles, for example in para 21 which discusses the need for greater co-operation and collaboration.

#### ***The role of Natural Resources Wales (NRW)***

16. Other than the reference in Para 6 the only other reference to NRW's role is in Para 5 which covers liaison with the authorities responsible for protected landscapes and providing advice and evidence. The document should also mention NRW's role in designating new protected landscapes and reviewing existing ones, advising local planning authorities on planning matters and advising Ministers on all matters relating to the purposes of National Parks, including planning.

#### ***Section 2, context***

17. The confusion between AONBs and National Parks is particularly apparent in this section which also needs to include more detail on the special qualities of protected landscapes and the services they deliver, for example, the links between landscape management and water quality. It should also highlight the fact that it is these special qualities which give protected landscapes their nationally (and internationally) important status. This would help address the concern raised in para 15 about the need for greater recognition of the multiple functions performed by landscapes. It would also be useful to add some facts and figures on National Parks and AONBs to this section and to give greater prominence to the challenges currently facing protected landscapes (as discussed in para 34).

#### ***Section 3, vision***

18. We do not believe that this section offers a real vision for the future of Wales's protected landscapes and we would like to see more on how their special qualities will be sustained and enhanced. This follows on from the points raised in the introduction and in (iii) above.

#### ***The link between sustainable development and protected landscapes***

19. There is a need for a more refined interpretation of sustainable development in protected landscapes where sustainable development can

only be achieved if their special qualities are protected and enhanced. We welcome the recognition in para 14 that designation facilitates sustainable development, but there needs to be a greater explanation of why this is the case. We are also concerned about the reference in para 15 to ‘competing pressures on landscape and environment management’.

20. It is essential that the introduction of sustainable development as the central organising principle of Welsh Government does not weaken the protection provided to protected landscapes. This means that this policy statement must clarify the relationship between the Sustainable Development duty (which it is proposed will apply to National Park Authorities and is expected to be introduced in the Future Generations Bill) and the environmental, social and economic objectives which each National Park has adopted in partnership with other stakeholders through its Management Plan.
21. The draft statement contains no guidance on how the Sustainable Development duty will change the way these areas should be managed. This needs to be rectified in the final statement which should also make reference to, and endorse, the definition of sustainable development currently used in Wales and accepted by the Welsh Government which highlights the need to reduce consumption and waste and to live within environmental limits. In the context of protected landscapes, those environmental limits are well established through the statutory requirements to conserve and enhance their natural beauty and hence protect the services they provide. If Welsh protected landscapes are to be managed sustainably, the environmental limits of these areas must not be exceeded, and this must be clear within the policy statement.
22. The statement will also need to clarify the relationship between the promotion of sustainable development in a protected landscape and its management plan approach. This means that it will be necessary to clarify the relationship between sustainable development and the Sandford principle, the existing statutory mechanism which applies in circumstances where there is a conflict of interest between change and the achievement of the area’s statutory purposes.
23. With regard to the last sentence of para 15, it is important to note that the first statutory purpose of National Parks is ‘**to conserve** and enhance natural beauty...’ (our emphasis) – the sentence refers only to landscape enhancement.

***‘Ecosystem approach’***

24. We welcome the recognition that this new approach will mean considering the environment as a whole (para 16). However, we believe that there should be a much clearer recognition in this section of the fact that landscape management already provides the framework for an ecosystem approach by ensuring that the interaction between human activity and the natural environment is considered in an integrated way. However, such a

framework will only exist if they are able to deliver their statutory purposes effectively.

### ***Seascapes***

25. We are concerned that there is only one mention of the marine environment in the whole document (in para 20). The links between land and sea are an important feature of Wales' coastal protected landscapes. There is a need to take an integrated approach to landscapes and seascapes if an ecosystem services approach is to be achieved so there should be a much greater emphasis on seascapes throughout the document.

### ***Section 5, outcomes***

26. The outcomes set out in section 5 are very general in their nature and do not relate specifically to matters which distinguish protected landscapes from any other area of the countryside in Wales. We suggest that each of these is redrafted to make them more applicable to the particular circumstances of protected landscapes and to make it clear that they are to be achieved within the overall vision of the conservation and enhancement of these special areas.

### ***Tourism and farming***

27. Both tourism and farming make a significant contribution to the economy in protected landscapes and para 33 makes some useful points about them. However, it would be good to include some more detail here, particularly with regard to the role of the tourism industry in ensuring that these 'icons of tourism' are looked after properly. It would also be good to say more about the role that NPAs already play in supporting farming and the potential for them to take a greater role in the management of Glastir in future.

### ***Renewable energy***

28. Para 35 refers to the potential for protected landscapes to provide 'a large amount of renewable energy' but does not place enough emphasis on the need to ensure that any energy infrastructure proposed for protected landscapes needs to be of an appropriate scale and type. It would also be helpful to mention some of the types of renewable energy infrastructure which can more easily be delivered without compromising the landscape, e.g. tidal energy.

### ***Section 6, delivery***

29. There is no mention in this section of how the delivery of the outcomes set out earlier will relate to the natural resource management planning that the Welsh Government proposes to introduce. For example, is the strategic plan for all protected landscapes to be part of the national natural resources plan for Wales? There is an opportunity to build on existing National Park Management Plans as part of the proposed new process and these could easily be adapted to provide local natural resource management plans.

30. Given the remit of the Williams' Commission we are concerned about the reference in para 53 to encouraging 'a more simplified method of strategic planning and the emergence of more experimental approaches to national park management. This might, for example, include the joint production of one strategic plan for all protected landscapes in Wales which sets national outcomes, with a set of local delivery plans that provide local outputs in support of those outcomes'. We would like greater clarification of exactly what is intended by this and would not support anything which dismantles or undermines the existing planning and management arrangements for these areas.
31. With appropriate amendments as set out in this response, the policy statement now being consulted on could provide the strategic framework required for local plans so we are not clear what the purpose of a further strategic plan would be and we do not support its development. We would also be concerned that any attempt to centralise the organisation of protected landscapes would fail to reflect the local variation in policy approaches currently adopted in their planning and management of in order to take account of local circumstances and the desires of local stakeholders. Whilst we recognise that there are potentially efficiencies that could be made as a result of greater sharing of services and expertise between the three National Parks and the AONBs in Wales, we would be concerned about anything which removed the ability for each National Park to take account of locally specific issues in the production of their plans as this would make it much harder to engage local partners in delivery. As the document itself highlights, each designated landscape is distinctive in its own way (para 34).
32. This section does not say anything about the resources required for the management of protected landscapes. It is essential that this framework recognises the need for continuity of both financial and staff resources on a long term basis if it is truly 'taking the long view'.

**Question 2: Does this policy document enable Wales' protected landscapes to fully deliver on their respective statutory purposes?**

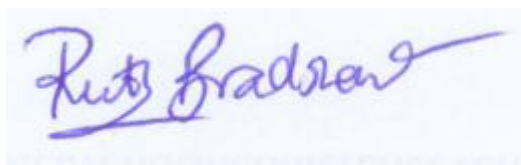
33. Unfortunately, the document does not enable Wales' protected landscapes to fully deliver on their respective statutory purposes as these are not adequately covered in the outcomes section. In particular, there is no mention in the outcomes of the first purpose which as para 22 states is considered the highest priority under the Sandford principle. In order to address this, we believe that there should be an additional outcome relating to the conservation and enhancement of the special qualities of protected landscapes which takes precedence over the others listed. As set out above, the outcomes also need to be redrafted to make them of specific relevance to protected landscapes.

**Question 3: If you have any related issues which we have not specifically addressed, please use this space to report them:**

34. We responded to the recent call for evidence from the Williams Commission on Public Services Delivery with a submission which argues strongly for the retention of National Park Authorities. We believe that this is the only way that National Parks can continue to deliver the range of benefits that they currently do and to ensure that the statutory purposes of National Parks are delivered. The summary conclusions of our submission are included as Appendix 1 to this document.
35. There is a reference in para 30 to protected landscapes providing models for use in other rural areas. Whilst we believe that there is much that other local authorities could learn from NPAs and some existing examples of good practice that could usefully be transferred to other rural areas, it is important to remember that the circumstances in protected landscapes are different as the statutory purposes do not exist elsewhere.

We hope that our comments are helpful in preparing a final version of this policy statement that will ensure all the statutory landscapes in Wales are able to deliver their statutory purposes effectively. We would be happy to discuss any of the points we have raised or provide further information.

Yours faithfully



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## **Appendix 1: Summary conclusion from our Submission to the Williams Commission**

In conclusion, we would reiterate our support for National Park Authorities, because:

- They are able, in collaboration, to deliver multiple policy outcomes for a sustainable economy, environmental resources management, cultural and historic heritage, conservation, social inclusion, health and wellbeing.
- There is an existing duty to collaborate with local authorities to seek to foster economic and social wellbeing for those living and working in National Parks.
- There was a major review of governance in the 1990s, which resulted in the introduction of National Park authorities, and they were again reviewed in 2004.
- NPAs deliver significant added value and are exemplars in partnership working.
- There is a significant regulatory reform programme coming forward in Wales, which will prove challenging for public bodies responsible for delivery.
- Management of National Parks requires knowledge of local issues and engagement of local people, while protecting nationally important assets.
- NPAs have interdependent responsibilities with Natural Resources Wales and local authorities, which need coordination.
- NPAs represent excellent value for money and are able to lever in significant resources to support these nationally important landscapes.