



NATIONAL PARKS WALES
Britain's breathing spaces

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20 September 2013

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

National Parks Wales welcomes the opportunity to respond to the Welsh Government consultation, "Taking the Long View: Consultation on the draft Policy Statement for Protected Landscapes in Wales". The three National Park Authorities (NPAs) in Wales collaborate as *National Parks Wales* to respond to policy developments. Members and Officers from the Brecon Beacons; Pembrokeshire Coast and Snowdonia National Park Authorities have inputted into this response.

Our response is enclosed as Appendix 1. It sets out, and by doing so reinforces, concerns held and expressed by the individual National Park Authorities. We look to the policy statement to provide strong and strategic, clear and enunciated, leadership to those responsible for the management of protected landscapes. With that in mind, we believe that the draft Policy Statement needs to be strengthened and made clearer to serve its primary purpose "to set out the Welsh Government's strategic policy framework for AONBs and National Parks in Wales". There are also several sections across several themes that need further clarification.

We look forward to working with the Welsh Government and other stakeholders to ensure that this document reflects the strategic vision you have for the protected landscapes of Wales and serves its purpose, setting out the policy framework for the long view. If you require any further information or clarification please do not hesitate to contact me in the first instance.

Yours sincerely,

Greg Pycroft
Policy Officer
National Parks Wales



BRECON BEACONS
NATIONAL PARK



Parc Cenedlaethol
Arfordir Penfro
Pembrokeshire Coast
National Park



PARC CENEDLAETHOL ERYRI
SNOWDONIA
NATIONAL PARK

Appendix 1.

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?

1. The Vision for Protected Landscapes & General Comments

1.1 National Parks Wales believes that in order to become the authoritative strategic policy framework for protected landscapes in Wales, *Taking the Long View* needs strengthening. We propose that this is achieved through strengthening the current section 62(2)/ section 84(1) duty on public bodies; clearly and explicitly setting out the legislative framework within which protected landscapes are managed; expanding upon how you see Natural Resources Wales working with the protected landscapes, and ensuring that the concepts and issues within the statement are as clear and unequivocal as possible. These points are expanded upon under the headings below.

1.2 The vision should feature more prominently within the policy statement. It is, after all, setting the direction of protected landscape management in the short to mid-term. It needs to be expressed in greater clarity, in order to provide a better understanding of the interdependency between the natural environment, society and the economy, and the need to express this in terms of the special contribution that protected landscapes can and do make to achieving a higher level of sustainability.

1.3 There should be stronger emphasis throughout the Policy Statement to the 1995 Environment Act which states clearly the purposes and duty of National Parks. The legislative context within which protected landscapes exist should be set out in the introductory paragraphs and reference to the Sandford principle should also be made early on.

1.4 Since the publication of the last Policy Statement in 2007 National Park (and AONB) policy has developed and continues to diverge across the UK a consequence of devolution and different policy, political and funding priorities. Additional contextual references to English, Scottish, European and International experience over the past decade would set the scene for Welsh protected landscapes, which do not exist in isolation, but within a vibrant global family that share many of the same challenges and are sharing the solutions with each other.

1.5 In more practical terms, especially since elements of the policy statement and its delivery fall within other Ministerial portfolios (Natural Resources Wales, for instance) and the significant importance of protected landscapes to Wales we hope that steps are taken to confirm the status of the policy statement and ensure that it is formally endorsed at Cabinet level. We are happy to discuss this further.

2. Section 62(2) & Section 84(1)

2.1 We welcome the continued recognition that protected landscape management and delivery is not undertaken in isolation by National Park Authorities and AONB partnerships, but depends upon a wide range of stakeholders working together to deliver shared outcomes (para 4). Securing such support can be time consuming and resource intensive even amongst public bodies (the relevant authorities) that are supposed to have a duty "having regard to" the purposes of protected landscapes (s62 (2) Environment Act 1995 and s84(1) of the Countryside and Rights of Way 2000).

2.2 We believe that the duty (para 6), as it is currently formulated needs revision. We propose that s62(2) and s84(1) needs strengthening turning a voluntary "tick box" exercise into a much more



engaging, positive obligation upon “relevant authorities”. In both instances we would replace “having regard to” with “supporting”. The Welsh Government’s legislative programme provides an opportunity to do so, either via the Future Generations (Wales) Bill or the Environment (Wales) Bill. The policy statement can be used to set out the Welsh Government’s intention to legislate, giving “relevant authorities” early notice.

2.3 The Welsh Government may also wish to update the guidance issued in 2005 on the duty, and refer to this within the policy statement. The guidance would benefit from revision, especially in terms of an update to the out of date list of relevant public bodies and the other interests that constitute “relevant authorities”.

3. Natural Resources Wales

3.1 We look forward to developing a positive collaborative working relationship with Natural Resources Wales (para 5) and welcome it having the role to promote and monitor the extent to which “relevant authorities” engage with the s62(2)/s81(1) duty (para 6).

4. The Ecosystem Approach

4.1 The principles of the ecosystems approach are entirely consistent with the purposes of protected landscapes. Within para 16 the Welsh Government currently asks NPAs to set priorities for competing demands on Wales’ natural resources based on a narrow set of criteria. Within National Parks prioritisation does occur, but it managed through a triage process influenced by available resources, risk assessments etcetera, rather than by weighing up one intrinsic value against another. We believe that this should be reflected within para 16.

5. Landscape Management

5.1 We believe that the statement should be cautious in using the term “multifunctional” to describe all of Wales’ designated landscapes (para 17). Whilst this might be viewed as a Welsh Government aspiration, and whilst there might be a range of operations and activities taking place, this is not a uniform picture. Economic profiling of the different landscapes might reveal brittle local economies with limited diversification.

5.2 Protected landscapes need managing, and it is through farming, conservation, forestry and water management that this is achieved, exerting a direct influence on the special qualities. The biggest positive achievements for designated landscape management will therefore be realised through the implementation of positive measures in future rounds of the RDP; Glastir and successor agri-environment schemes. Over the longer term forestry policy, water resource management policy, conservation policy and CAP reform will also impact upon the management of protected landscapes. The policy statement should therefore recognise these linkages and establish a clearer mandate for NPAs and AONB management bodies to engage with the development and implementation of these measures for designated landscapes. This also links to the duty on “relevant authorities” to – in our view – “support” National Park and AONB purposes and to NRW’s ability to promote and monitor compliance (see above point 2).

5.3 Wales’ National Parks are referred to as “areas where new solutions to environmental and rural issues are tried, tested and shared,” (para 12). Given the importance placed on Wales’ protected landscapes by the policy statement, effective land management tools should include measures designed explicitly for them, we would look to working with the Welsh Government, NRW and others to develop them.



6. Protected Landscape Management Planning

6.1 The policy statement should lead to a clearer understanding of the role played by the planning function within protected landscapes. It should refer to the fact that the planning system is the key tool for achieving the National Parks statutory purposes and duty. The planning system does not only deliver protection, but contributes to conservation and the enhancement of special qualities.

6.2 It is important that the policy statement acknowledges the diversity of Wales' protected landscapes and the economies they support. As such there is a need for planning policy guidance that acknowledges these differences and provides scope for NPAs and AONBs to "articulate visions of rural development" (para 30).

6.3 Many of the themes outlined within the draft are pulled together at the end by introducing the notion of a common management planning framework across the National Park Authorities and AONBs (section 6). A clearer and more detailed sense of national purpose would improve this section. On the flip side, more of the policy statement could allude to a common management planning framework.

7. The Outcomes

7.1 We believe that the Outcomes still need extensive reworking for clarity and consistency. The NPAs have provided their separate thoughts on each of the five outcomes and we do not wish to repeat those in detail here. More generally, the outcomes (the italicised statements) contain a mixture of high-level aspiration and more detailed prescription, the latter distracting from the former. One solution may be to restructure the section so that the outcome statement is purely aspirational and is followed beneath clearly indicating delivery mechanisms; suitable illustrations and potential examples, bearing in mind that not all will be applicable to all protected landscapes.

7.2 The recognition of the important role that State of the Park/AONB Reports make is welcomed (para 2). We believe that provided sufficient evidence is publicly available in formats which acknowledge National Park and AONB boundaries, these reports are an effective means for reporting on outcomes. The policy statement should therefore encourage wider sign up to these reports to help secure fuller commitment to National Park and AONB purposes and to help foster new partnerships being established. A joint approach to evidence gathering, including the carrying out of data collection and circulation, original research projects and site monitoring are all important components.

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

8. We wish to draw attention to point 5.2 above, the policy statement could be more mindful of how national delivery mechanisms (RDP, Glastir, highways policy, Planning Policy Wales, health, education etc) might achieve added value by having explicit targets set for them within National Parks and AONBs.

9. We would welcome clarification from the Welsh Government as to whether the guiding principles in the policy statement will be usable as evidence by NPAs to support policy development, for instance new policies in local development plans.

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



10. Where legislation and/or technical documents are alluded to within the text of the policy statement it would be helpful to provide a footnote or alternatively a bibliography/reference at the end.

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