

Protected Landscapes Team
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Taking the Long View-Consultation on the draft Policy Statement for Protected Landscapes in Wales

The purpose of Natural Resources Wales is to ensure that Wales' natural resources are sustainably maintained, enhanced and used, now and in the future.

Natural Resources Wales has a legal duty under the Environmental Protection Act to conserve and enhance natural beauty in areas designated as National Parks or Areas of Outstanding Natural Beauty (AONBs) and elsewhere. We have a wide range of powers and duties with regard to protected landscapes in relation to their management, administration and designation. We also support the Welsh Government and Defra on the implementation and delivery of the European Landscape Convention in Wales.

Protected landscapes are strategic national assets for Wales. Covering 25% of the land area they contain a wide range of natural resources and ecosystem services, the benefits of which contribute to economic, social and environmental well being. This was demonstrated by the recent Arup study, which found that the economies of the three Welsh National Parks account for £557 million Gross Added Value supporting 10,738 jobs within their boundaries and a further 2,033 across Wales ['Valuing Wales' National Parks', National Parks Wales, WLGA & Natural Resources Wales, ARUP 2013]. The Protected Landscapes Team are important delivery partners for Natural Resources Wales and Welsh Government outcomes.

We welcome the commitment of the the Welsh Government towards protected landscapes as demonstrated by the draft policy statement and the provision of integrated advice for National Parks and Areas of Outstanding Natural Beauty.

We acknowledge that the proposals and propositions set out in the consultation document will have an interrelationship and interdependency with the Bills set out in the Government's legislative programme and the work of the Commission on Public Service Governance and Delivery. Our comments and advice reflect this.

We welcome the acknowledgement in the document to our role as statutory advisors on landscape and natural beauty and we look forward to working with the Welsh Government and those authorities responsible for protected landscapes, to develop and take forward the propositions set out in 'Taking the Long View'.

Our advice has been informed by the Environment Sub Group of the our Board and we hope that you find it constructive and helpful.

We would welcome an opportunity to expand on any of the points made in this response.

Yours sincerely

Emyr Roberts
Chief Executive
Natural Resources Wales

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?

- 1.1 Natural Resources Wales welcome sustainable development as a core central organising principle and supports the Welsh Government's ambition that protected landscapes can become a key delivery mechanism for achieving a more sustainable way of living in rural Wales.
- 1.2 We also welcome the inclusion of AONBs in the policy statement. This, for the first time, provides a national framework for the planning and management of protected landscapes in Wales. This Policy Consultation confirms their national status in Wales and that protected landscapes are recognised through UK and International designation systems as the main statutory mechanism to manage and enhance our nationally important landscapes.
- 1.3 Subject to the recommendations of the Commission on Public Service Governance and Delivery, we support closer collaboration between the organisations responsible for protected landscapes in Wales to deliver cost effective, efficient, high quality and resilient services to manage these important landscapes for local and national benefit.
- 1.4 If protected landscapes are to be an effective delivery mechanism in relation to economic, social and environmental outcomes there must a wider range of levers and mechanisms nationally and locally to fully deliver the outcomes that could be delivered. Our comments below in relation to the proposed strategic plan and the interrelationship with Single Delivery Plans elaborate on this point.
- 1.5 Consideration could be given to the alignment of the outcome indicators with those agreed between Natural Resources Wales and the Welsh Government to help ensure synergy and integration between shared outcomes and the Programme of Government. Performance measures relating to the outcomes could then be more specifically tailored to reflect the special qualities of protected landscapes.
- 1.6 Whilst acknowledging that progress has been made in working with a range of stakeholders, the document could provide greater guidance on the need, and opportunity, to work with new sectors such as health and business to deliver the outcomes and vision set out in the policy statement.
- 1.7 Further guidance would enable protected landscapes to integrate a longer term perspective to their management, planning and decision making, including the need to develop a resilient environment, communities and economy to meet the future challenges of climate change and pressure on natural resources.

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

- 2.1 We strongly support the Welsh Government's endorsement that these are landscapes of national importance, with designation conferring the highest status for the conservation of landscape, and would welcome reference to their international status in achieving Category V recognition through the World Conservation Union IUCN evaluation process.

- 2.2 A common understanding of terminology is central to helping deliver statutory purposes, providing clarity, certainty and consistency for stakeholders and decision makers. The policy statement document could be improved in this respect:
- To reflect statutory terminology, and to ensure consistency with existing guidance, we recommend the use of the term ‘natural beauty’ along with appropriate references to the legal purposes and special qualities of protected landscapes throughout the document. The document also needs to clarify in paragraph 22 that the Sandford Principle applies legally only to National Parks and that the correct definition of the Silkin test is included in paragraph 32.
 - The document usefully makes reference to the need for decision makers to take account of the impact on protected landscapes of issues such as climate change, energy and tourism. However, the document does not provide advice on how such matters should be taken into account in decision making. Consideration could be given to sign posting other sources of guidance where available eg TANs, Planning Policy Wales. The outcome of the review of access legislation will need to be taken into account.
 - The reference to ‘large amount of renewable energy’ in paragraph 35 needs to be clarified to avoid ambiguity and provide certainty for decision makers and stakeholders.
- 2.3 The document rightly highlights the key role of the land use planning system as an important delivery mechanism for protecting protected landscapes. Nevertheless, greater emphasis is required on the main tools available to manage the landscape, for example Glastir, and the potential future implication of CAP reform.
- 2.4 The proposition in relation to ‘the joint production of one strategic plan for all protected landscapes in Wales which sets national outcomes’, potentially provides a mechanism to develop a national evidence base for protected landscapes in Wales, as well as a process to engage key national and strategic stakeholders to contribute to the delivery of national outcomes for protected landscapes. However, there will be a need to clarify the relationship between such a strategic plan and any emerging proposals for natural resource management plans in the forthcoming Environment Bill
- 2.5 To reflect the ecosystem approach and natural resource management, the strategic plan would need to be spatial, integrated and participative. In progressing the proposition it will be necessary to clarify:
- The lead role and responsibility for preparing the strategic plan;
 - the status of the strategic plan and responsibility for endorsement;
 - the relationship between the existing s62/85 strategy and existing plans, programmes and initiatives;
 - the relationship between monitoring s62/85 strategy as referred to in paragraph 6 and the delivery and monitoring of a strategic plan;
- 2.6 Natural Resources Wales notes its proposed monitoring role will wish to discuss the scope of the role, the resource implications and possible shared ownership with the Welsh Government;

- 2.7 We would welcome an opportunity to work with the Welsh Government and the Protected Landscapes Team in particular to help scope the proposed strategic plan, the evidence base and key principles and how this would fit with our proposed catchment approach to natural resource planning.
- 2.8 The emphasis on ‘innovative approaches’ is welcomed. The Protected Landscapes Team have wide experience of testing and trialling new approaches to management of the landscape, such as Tir Cymen and Tir Gofal. We would welcome reference to the Welsh Government’s Sustainable Development Fund as an example of testing innovative approaches to sustainable development. We would also welcome reference to opportunities presented by the future review of the Glastir Scheme. Protected landscapes will also play a role in any innovative approaches to service delivery recommended by the Commission on Public Service Governance and Delivery.
- 2.9 Guidance will be required clarifying the relationship between the strategic plan and individual statutory management plans for protected landscapes, focussing in particular on the role of local distinctiveness, the evidence base and stakeholder engagement.
- 2.10 The interrelationship between the strategic plan and any national or regional frameworks proposed in the Environment Bill will need to be confirmed together with the interdependency between the protected landscape management plan, local development plans and single delivery plans. An opportunity exists to develop and provide a single evidence base to inform these discrete, yet interrelated plans and processes.
- 2.11 The management planning process for protected landscapes provides a participative process and framework to integrate the needs of national and local stakeholders, together with mechanisms to avoid pressured environments and to provide voluntary codes of conduct and voluntary access codes to manage conflict at a local scale. Engaging agricultural interests and land managers provides an opportunity to underpin management plans with integrated land and water management using an ecosystem approach to natural resource management.
- 2.12 The land use planning system provides a key delivery mechanism for protected landscapes to deliver statutory purposes and outcomes. We therefore welcome the recognition the policy document gives to the importance of the planning system in delivering protected landscape statutory purposes.
- 2.13 Notwithstanding the outcome of the Planning Bill and the Commission on Public Service Governance and Delivery, consideration could be given to providing further advice and guidance in relation to the discharge of the planning and management functions of protected landscapes in the context of the need to develop future economic, social and environmental resilience.
- 2.14 The importance of collaborative and partnership working between the Protected Landscapes Team, Local Authorities, Natural Resources Wales and the Welsh Government to deliver shared outcomes could be highlighted, together with the important role of external funding.

2.15 Paragraph 12 refers to reducing 'regulation' and it would be useful to clarify how this relates to delivering better outcomes for sustainable development and the statutory purposes of protected landscapes.

Q3: If you have any related issues which we have not specifically addressed, please use this space to report them:

3.1 Natural Resources Wales support the integrated approach promoted in the Policy Statement Consultation and believes expansion of the following areas would improve clarity for decision makers and stakeholders:

- The document could be more explicit in acknowledging the interrelationship between the management of ecosystem services, the provision of green infrastructure and the role of landscape as an integrating framework delivering a wide range of economic, social and environmental benefits. The care and management of landscape and its components underpins economic and social well being as highlighted in the recent Welsh Government Strategy for Tourism 2013-2020 'Partnership for Growth'.
- It would be useful to provide guidance on the functional relationship between protected landscapes and surrounding areas both in relation to environmental resources but also to the delivery of health and socio economic benefits.
- It would be helpful to provide advice on seascapes, marine, coastal and fisheries management given the significant coastal nature of five of the protected landscapes in Wales and how an integrated ecosystems approach can be achieved across marine and terrestrial systems.
- The reference to Welsh language and culture in paragraph 24 could also usefully refer to the role of the Welsh language as a component part of cultural services in the context of the ecosystem approach.
- It would be useful to include a statement setting out the Welsh Government's position on future designations in Wales to provide clarity and certainty for decision makers and stakeholders.
- There should be greater emphasis on the main tools available to manage landscape e.g. the Gastir scheme and its future review, the next Rural Development Plan and CAP.
- The impact of the proposed legislative programme e.g. the Environment Bill, the Planning Bill, Future Generation Bill and the Review of Access Legislation should be considered.