

Greater parity between the National Landscapes of Wales

Summary

This paper has been prepared in response to the letter, dated 14th May 2018, from Hannah Blythyn, Minister for Environment on the issues to be addressed to provide greater parity for Areas of Outstanding Natural Beauty (AONBs) with the National Parks in Wales, particularly in terms of status, profile and resourcing, and the delivery of rich ecosystems, vibrant and resilient communities and opportunities for outdoor recreation. It is also prepared in the context of the July 2018 statement ‘Valued and Resilient: The Welsh Government’s Priorities for AONBs and National Parks’. It is a collective response prepared by the five AONB lead officers in Wales in collaboration with colleagues from Natural Resources Wales (NRW) and the National Association for AONBs (NAAONB). The twelve proposals below intend to build on the opportunities outlined in ‘Valued and Resilient’, be straightforward and robust and together address the inequality of status between AONBs and National Parks. They also recognise that there are inequalities between the AONBs in Wales.

‘Valued and Resilient’ identifies a number of key expectations of Designated Landscapes, including “the ability to function effectively at a national level to inform and influence strategic priorities and plans, whilst maintaining a credible mandate and the relationships necessary to deliver within a local area.” Currently AONB teams across Wales, individually and collectively, do not have the capacity to meet all these expectations.

The network of Designated Landscapes in Wales is fundamental to creating the connectivity needed for truly resilient ecosystems. AONBs are a key delivery mechanism for the Well-Being of Future Generations Act, the Environment Act and NRW’s statutory landscape remit, Area Statements and Natural Resources Planning. The opportunity and potential exists for AONBs to act as a focus and deliver place-based management of natural resources, if the capacity of AONB teams is enabled to do this.

We believe the twelve proposals below will address the issues of status, profile and resourcing for AONBs in Wales. The rationale for the proposals is outlined in the subsequent sections.

Status

- A. A second purpose on “Understanding and Enjoyment” be pursued for AONBs at the earliest opportunity in recognition that all AONB partnerships¹ play a major role in delivering opportunities for outdoor understanding, enjoyment and recreation in Wales. In the interim, Welsh Government provides policy confirmation of the ‘supplementary purposes’ for AONBs.
- B. Strengthen the CRoW Act Section 85 ‘Duty of Regard to the purpose of AONB designation’ into a ‘Duty of Regard to the purpose of AONB designation and implementation of the AONB Management Plan’.
- C. Explore the potential for AONB partnerships to become statutory consultees for planning applications.

¹ AONB partnership(s) with a lower case p, is the generic term used to refer to an AONB Partnership, Joint Advisory Committee (JAC), Joint Committee (JC) or Conservation Board or any other organisation recognised as the lead governance body for an AONB.

- D. Welsh Government to make a 'national appointment' to each AONB partnership and these appointees to also sit on the new 'National Partnership for Designated Landscapes' alongside AONB partnership chairs and lead officers.

Profile

- E. AONBs and National Parks to be referred to generally and collectively as the 'National Landscapes of Wales' rather than 'Designated Landscapes' or 'Protected Landscapes', hence the 'National Partnership for Designated Landscapes' would become the 'National Landscapes of Wales Partnership', etc.
- F. The post-Brexit agri-environment and LEADER replacement schemes to be targeted at delivering the AONB Management Plans and AONB partnerships to have a key role in providing advice and support.
- G. The Minister convenes an annual seminar for CRoW Section 85 public bodies to share good practice on how they are delivering their 'Duty of Regard to the purpose of AONB designation' and how the AONB Management Plan is being implemented.
- H. The Minister elevates the AONB Management Plans currently commencing their 5 year reviews by providing a Foreword, formal endorsement when adopted and ensuring supporting policy recognition in Planning Policy Wales (PPW).
- I. Welsh Government and NRW to produce data/statistics cut to each AONB as part of existing data and analysis activity, e.g. tourism, agriculture, population, state of environment, designated site condition etc., in order to inform the AONB Management Plans and support clearer understanding of the value, profile and significance of AONBs.

Resourcing

- J. AONB partnerships commissioned and resourced on a long term basis to provide a core AONB staff team with the critical mass and capacity to deliver the AONB Management Plan and the functions outlined in Valued and Resilient.
- K. The National Association for AONBs is resourced to assist Welsh Government with the establishment and servicing of the new 'National Landscapes of Wales Partnership', co-ordinate AONB (& NLW) member training and AONB Performance Monitoring.
- L. Welsh Government, NRW, Local Authorities and NGO's to have the resilience and capacity to deliver Valued and Resilient and the statutory purpose(s) of the National Landscapes of Wales.



Greater parity between the National Landscapes of Wales

Table of Contents

| | |
|--|----|
| 1. Background and our case for positive change..... | 4 |
| 2. AONB Purpose(s)..... | 6 |
| 3. AONB Management Plans..... | 8 |
| 4. Governance and Scrutiny..... | 11 |
| 5. Resourcing & Capacity | 13 |
| Appendix 1 – Short / Medium / Long term Actions..... | 17 |
| Appendix 2 – AONB Attributes | 18 |
| Map: National Landscapes of Wales..... | 19 |



Llŷn AONB



1. Background and our case for positive change

- 1.1. This paper has been prepared in response to the letter (14 May 2018) from Hannah Blythyn, Minister for Environment on the issues to be addressed to provide greater parity for AONBs with the National Parks in Wales and the delivery of rich ecosystems, vibrant and resilient communities and opportunities for outdoor recreation. It is a collective response prepared by the five AONB lead officers in Wales in collaboration with colleagues from Natural Resources Wales (NRW) and the National Association of AONBs (NAAONB).
- 1.2. In developing this response, we have also taken into account the recent (July 2018) statement – ‘Valued and Resilient: The Welsh Government’s Priorities for AONBs and National Parks’. The proposals below are intended to build on the opportunities outlined in ‘Valued and Resilient’.
- 1.3. The ‘Marsden Review’ of Designated Landscapes and subsequent collaborative work through the Future Landscapes Wales programme have correctly highlighted inequalities between AONBs and National Parks – particularly in terms of status, profile and resourcing. However, it is also worth highlighting that there are also significant disparities between the AONBs in Wales. Consequently, we believe that measures are also needed to ensure there is a ‘critical mass’ in AONB partnerships and teams and a basic minimum/standard is established of what is expected for AONBs in Wales.
- 1.4. We have considered the issues of ‘status’, ‘profile’, ‘resourcing’, and how together they address the delivery of rich ecosystems, vibrant and resilient communities and opportunities for outdoor recreation. The proposals are segregated into ‘status’, ‘profile’ and ‘resourcing’ but apply to and/or collectively have benefits across several simultaneously. In Appendix 1 the 12 Proposals have also been divided in to ‘Long term’, ‘Medium term’ and ‘Short term’ actions.
- 1.5. It is recognised that the ‘National Park’ designation and brand is more widely understood by some than ‘Area of Outstanding Natural Beauty (AONB)’, but we believe the closer parity can still be achieved through modifications to functions rather than form, particularly given the stated levels of current and future resourcing.

Future Landscapes Delivering for Wales – Vision:

Wales as a nation values its landscapes for what they provide for the people of Wales and elsewhere. The designated landscapes of Wales deliver both within and beyond their boundaries to enhance their social, economic, environmental and cultural resources; delivering the maximum well-being benefits for present and future generations whilst enhancing the very qualities that make them both distinctive and cherished.

Our case for positive change

Our proposals focus on four key areas, providing a coherent approach to raise the profile and status of AONBs, improve their ability to deliver rich ecosystems and opportunities for outdoor recreation. The four areas and our rationale are as follows:

- Updating and strengthening of the **AONB purposes** – because the current purposes are limited, the associated duties on public bodies are weak and the proposals would give genuine mandate to activities that AONB partnerships already deliver
- Strengthening and implementing the **AONB Management Plans** – because the plans are the expression of what needs to happen in the AONBs and are the core organising principle for local delivery of Well-being goals and the Sustainable Management of Natural Resources
- Improve **governance and scrutiny** – because the profile and engagement of AONB Partnerships with their local authorities is often low and should better reflect their significance as nationally important designated and protected landscapes
- Focused and secure **resourcing and capacity building** – because the current insecure, opportunistic and often ‘hidden’ resourcing position constrains the ability and potential for AONBs to deliver.



2. AONB Purpose(s)

*Our case for positive change: Updating and strengthening of the **AONB purposes** – because the current purposes are limited, the associated duties on public bodies are weak and the proposals would give genuine mandate to activities that AONB partnerships already deliver*

A. A second purpose on “Understanding and Enjoyment” be pursued for AONBs at the earliest opportunity in recognition that all AONB partnerships² play a major role in delivering opportunities for outdoor understanding, enjoyment and recreation in Wales. * In the interim, Welsh Government provides policy confirmation of the ‘supplementary purposes’ for AONBs.

- 2.1. As recognised in ‘Valued and Resilient’, AONBs in Wales do not have the 2nd Purpose that National Parks have to “Promote opportunities for the understanding and enjoyment of the special qualities of national parks by the public.” AONBs that become Conservation Boards under Section 86 of the Countryside and Rights of Way (CROW) Act 2000 also have a similar 2nd Purpose, defined under Section 87(1) – ‘increasing the understanding and enjoyment by the public of the special qualities of the AONB’.
- 2.2. A key component of addressing the parity of status with National Parks (and AONB Conservation Boards) is to have the same statutory purposes. This would resolve two issues:
 - i) AONBs currently have no mention of ‘special qualities’ in their Purpose and
 - ii) AONBs are not statutorily required to operate in the realm of ‘enjoyment and recreation’, although it is widely recognised that AONBs are prime visitor destinations and AONB teams do a considerable amount – on very modest budgets – engaging tourism, recreation, business and community interests in helping deliver the AONB Management Plan, and in several cases providing visitor information and managing infrastructure.
- 2.3. It is acknowledged that a new Purpose for AONBs would require legislative change. However, the provision already exists in law for Special Qualities and the recreation purpose. Therefore, this primary legislation needs to be extended to all AONBs in Wales without the necessity to become Conservation Boards. It is noted that ‘Valued and Resilient’ states “there will not be a change of this nature now without broader support or when it is clear impediments to delivery can only be overcome through new legislation”. Therefore this remains a Long term action and:-

*** “In the interim, Welsh Government provides policy confirmation of the ‘supplementary purposes’ for AONBs”.**

- 2.4. In 1991 the Countryside Council for Wales and the Countryside Commission published ‘Areas of Outstanding Natural Beauty - A Policy Statement’ (CCP: 356), in which AONBs were given supplementary purposes of *“In pursuing the primary purpose of designation, account should be taken of the needs of agriculture, forestry, and other rural industries and of the economic and social needs of local communities. Particular regard should be paid to promoting sustainable forms of social and economic development that in themselves conserve and enhance the environment. Recreation is not an objective of designation, but*

² AONB partnership(s) with a lower case p, is the generic term used to refer to an AONB Partnership, Joint Advisory Committee (JAC), Joint Committee (JC) or Conservation Board or any other organisation recognised as the lead governance body for an AONB.

the demand for recreation should be met so far as this is consistent with the conservation of natural beauty and the needs of agriculture, forestry and other uses.” These have not been recognised or endorsed recently by Welsh Government or Natural Resources Wales, although they are included in various AONB Management Plans and other AONB documents.

- 2.5. ‘Valued and Resilient’ does state that “To encourage, provide for and manage responsible outdoor recreation opportunities is an important role for AONBs and a key remit for Park Authorities.” It also states “National Park Authorities have a duty to ‘foster the economic and social well-being of local communities within their national park’ and AONB local authorities also have a similar responsibility across the whole of their authority areas.... Designated landscape management organisations need to further develop and refine their own understanding of local economic resilience and economic opportunities....”. Even when AONB partnerships were vested with delivering all of this, they have only ever been able to access specific (invariably time limited) project funding, whereas the NPAs have been funded to do so.
- 2.6. We believe the reiteration and endorsement by Welsh Government of the supplementary purposes for AONBs, or the release of a similarly succinct ‘policy statement’ is needed. This therefore is a Short term action.

E. AONBs and National Parks to be referred to generally and collectively as the ‘National Landscapes of Wales’ rather than ‘Designated Landscapes’ or ‘Protected Landscapes’, hence the ‘National Partnership for Designated Landscapes’ would become the ‘National Landscapes of Wales Partnership’, etc.

- 2.7. The Marsden Review recognised the value of branding the AONBs & National Parks as the ‘National Landscapes of Wales’. While the statutory re-naming of the designations was not supported, there is no reason why the general use of the phrase ‘National Landscapes of Wales’ should not be used in place of the current colloquialisms of ‘Designated Landscapes’ or ‘Protected Landscapes’. The common and regular reiteration of the ‘national’ context of AONBs alongside National Parks would help redress the balance of status and profile.



Gower AONB

3. AONB Management Plans

*Our case for positive change: Strengthening and implementing the **AONB Management Plans** – because the plans are the expression of what needs to happen in the AONBs and are the core organising principle for local delivery of Well-being goals and the Sustainable Management of Natural Resources*

F. The post-Brexit agri-environment and LEADER replacement schemes to be targeted at delivering the AONB Management Plans and AONB partnerships to have a key role in providing advice and support.

- 3.1. Each AONB is largely the product of farming practices, and the value of these national landscapes to the whole nation is hugely dependent on sympathetic future land management practices. It is a legal requirement that public bodies have regard to the purpose of AONB designation (CRoW Act Section 85). Any future publicly funded land management scheme must, therefore, do likewise.
- 3.2. Agri-environment investment and incentives are the biggest influence on landscape quality, natural beauty and SMNR, but are not correlated with AONB purposes nor scrutinised for delivering for these nationally designated protected landscapes. The National Parks have more direct influence on agri-environment and LEADER schemes, either through direct targeting or delivery of the schemes. The post-Brexit rural land-use policy and delivery mechanisms must actively support SMNR through Area Statements and AONB Management Plan objectives.
- 3.3. The AONB Management Plans are the mechanism by which the future of each AONB is discussed, determined, and delivered. It is a locally-designed, nationally-relevant plan that depends on the collaborative activity of multiple stakeholders for delivery and has democratic sign-off. The majority of AONB Management Plans are currently being reviewed and new plans will be in place to take these areas forward once the UK leaves the European Union. The Plans will act as a catalyst for new thinking and positive action that will sustain and improve the flow of public goods from the nation's outstanding landscapes.
- 3.4. This proposal allows, for the first time, a clear way of aligning land management with the need to conserve and enhance the natural beauty of our national landscapes. AONB partnerships should play a key role in helping inform the new land management framework, for example by testing/piloting new approaches and using management planning processes to engage with land managers. AONB partnerships and AONB teams can also be enabled to deliver schemes either directly or through collaborative partnerships.

B. Strengthen the CRoW Act Section 85 'Duty of Regard to the purpose of AONB designation' into a 'Duty of Regard to the purpose of AONB designation and implementation of the AONB Management Plan'.

- 3.5. The CRoW Section 85 'Duty of Regard to the purpose of AONB designation' is widely recognised as not being sufficiently robust or effective, similarly the Section 62 (Environment Act 1995) duty for National Parks. There are some examples of good practice, such as OFGEM working with National Grid and the electricity Distribution Network Operators, but there are also many organisations and utilities that pay scant regard for the

National Landscapes of Wales. 'Valued and Resilient' states that there is logic to strengthening these respective duties meanwhile engagement and collaboration, led by NRW, rather than compliance, should be pursued for public bodies and other interested parties.

- 3.6. We believe a strengthened 'Duty of Regard to the purpose of AONB designation and implementation of the AONB Management Plan' provides a robust rationale and focus. Alternatively, similar wording to the new Biodiversity Duty could be used 'that public authorities must seek to maintain and enhance the Landscape of AONBs (&/or the National Landscapes of Wales) so far as it consistent with the proper exercise of their functions and in so doing promote the resilience of that landscape.' This would give a more direct requirement for public bodies to proactively pursue the purpose of AONBs in all planning and decision-making. The earliest legislative opportunity should be sought to achieve this. However it is recognised this will be a medium to long term action. An interim / short term action is therefore also proposed.

G. The Minister convenes an annual seminar for CRoW Section 85 public bodies to share good practice on how they are delivering their 'Duty of Regard to the purpose of AONB designation' and how the AONB Management Plan is being implemented.

- 3.7. Beside the implementation of Planning Policy Wales (PPW), the statutory requirement to produce an AONB Management Plan (jointly if there is more than one constituent local authority and review the Plan every five years) is the only obligation a local authority has in relation to AONBs. There is no obligation or requirement to deliver or implement the AONB Management Plan. In contrast National Park Plans are both the Local Development Plan for the Park and the management plan for the Park Authority.

- 3.8. There is also no requirement for AONB local authorities to report on actions toward their delivery of the AONB Management Plan. Implementation and progress reporting tend to be undertaken through the NRW AONB Partnership Programme &/or work programme or project reporting to the respective AONB committee (see below). This context has led to AONB Management Plans – and consequently AONBs - having a relatively low status and profile within their local authorities. Despite opportunities to deliver the Well-being goals and SMNR, the implementation of Management Plans is not recognised as significantly contributing to the delivery of local priorities and consequently are subject to little scrutiny within the local authorities. NRW's role in guiding and advising on Management Plan content and review processes is important and valued, but the status of these Plans need greater Government endorsement.

- 3.9. The Ministerial seminar would, in the short term introduce an element of scrutiny and endorsement by Welsh Ministers and simultaneously raise the profile and status of the AONB Management Plans, with both the constituent local authorities and other public bodies, and enhance the effectiveness of the Section 85 'duty of regard' (possibly in combination with s62 duty to the Parks). This would be augmented by the following proposals.

H. The Minister elevates the AONB Management Plans currently commencing their 5 year reviews by providing a Foreword, formal endorsement when adopted and ensuring supporting policy recognition in Planning Policy Wales (PPW).

3.10. A Ministerial Foreword to the AONB Management Plans would raise the profile and status of the AONB Management Plan locally and nationally. It would also provide an opportunity for the Minister to reiterate the key messages about the purpose(s) of AONBs and the status of the National Landscapes of Wales. Endorsement of the Plan, when adopted by the constituent local authorities, would similarly elevate the significance of the Plan to the local authorities.

3.11. The next update of Planning Policy Wales should also recognise that the statutory AONB Management Plans identify the Special Qualities of the area.



Anglesey AONB

4. Governance and Scrutiny

*Our case for positive change: Improving **governance and scrutiny** – because the profile and engagement of AONB Partnerships with their local authorities is often low and should better reflect their significance as nationally important designated and protected landscapes*

D. Welsh Government to make a ‘national appointment’ to each AONB partnership and these appointees to also sit on the new ‘National Partnership for Designated Landscapes’ alongside AONB partnership chairs and lead officers.

- 4.1. Governance of AONBs is through an AONB partnership³, either a local authority constituted Joint Advisory Committees (JACs) – for 4 AONBs, or a Joint Committee (JC) – with an Advisory Partnership. The AONB partnerships tend to have a broad representation of local or regional interests. However, whereas National Parks have several Welsh Government appointees, there are no formal national appointees that can act as a focus on the national designation. ‘Future Landscapes – Delivering for Wales’ encouraged Designated Landscapes to adopt the Principles of Good Governance. This has been followed by 3 of the 5 AONBs and the lack of national representation was noted as an issue. One national appointee to each AONB partnership would provide a level of ‘national’ focus without upsetting any balance of local accountability, nor undue bureaucracy for Welsh Government.
- 4.2. ‘Valued and Resilient’ identifies the intention to “establish a National Partnership to develop a robust culture of collaboration whilst also providing scrutiny and challenge on designated landscapes’ priorities and delivery”. This is welcomed, and the Welsh Government appointees could be invited to sit on the National Partnership alongside AONB partnership chairs and lead officers. However, of course, the ‘National Partnership for Designated Landscapes’ would become the ‘National Landscapes of Wales Partnership’.

C. Explore the potential for AONB partnerships to become statutory consultees for planning applications.

- 4.3. AONB partnerships are not Local Planning Authorities nor executive bodies, unlike the National Park Authorities. AONB partnerships are constituted through the constituent local authorities who are the Local Planning Authorities. AONB Lead officers work within their respective local authorities and through their AONB partnerships on responses to relevant policy consultations and with the National Association for AONBs on strategic responses. However, the AONB partnership &/or the lead officer are often requested or expected to provide ‘independent’ comments on significant planning applications, especially by the public. The multi-authority AONBs (Clwydian Range & Dee Valley AONB and Wye Valley AONB) employ or contract planning advisors to facilitate this function, whereas the single authority AONB teams tend to be embedded in or near the Planning Department.
- 4.4. There is an expectation, from the public at least, and some local councillors, that AONB partnerships should be statutory consultees. It could be argued that AONB staff should not need to be involved in development control matters on the assumption that the Local

³ AONB partnership with a lower case p, is the generic term used to refer to an AONB Partnership, Joint Advisory Committee (JAC), Joint Committee (JC) or Conservation Board or any other organisation recognised as the lead governance body for an AONB.

Planning Authority rigorously applies AONB policies. However, the Welsh Government should investigate this dichotomous expectation and resolve whether there is a way to modify the status of AONB partnerships to balance the disparity with the National Parks. It is acknowledged that this will need some time and potentially changes to legislation.

- 4.5. In the short term more training is required of Planning Officers, Planning Committee members and the public. Some of this can be formalised and delivered centrally, potentially through a properly resourced National Association for AONBs or locally by the AONB team, or in combination, again if the capacity and capability is enabled – see *Resourcing and capacity* below.



Wye Valley AONB

5. Resourcing & Capacity

*Our case for positive change: Focussed and secure **Resourcing and capacity building** – because the current insecure, opportunistic and often ‘hidden’ resourcing position constrains the ability and potential for AONBs to deliver.*

K. The National Association for AONBs is resourced to assist Welsh Government with the establishment and servicing of the new ‘Partnership for National Landscapes of Wales’, co-ordinate AONB (& NLW) member training and AONB Performance Monitoring.

- 5.1. AONB partnerships have been reasonably well engaged and represented at Welsh and UK levels through Welsh Government, NRW and the National Association for AONBs (NAAONB). However, the NAAONB is not currently resourced to operate effectively in Wales. A functioning ‘association’ for AONBs, collaborating closely with the National Parks, is essential for wider partnership working, strategic policy development, and as a vehicle for maintaining a ‘seat at the table’ for AONB lead officers when needing to work directly with governments and civil servants. This is ensured for National Park Officers by virtue of their status as leaders of Local Authorities but denied to AONB lead officers as a result of status disparity.
- 5.2. The National Association for AONBs would be a natural and obvious partner to help Welsh Government establish and service the new ‘National Partnership for Designated Landscapes’ or the ‘National Landscapes of Wales Partnership’.
- 5.3. There is a constant need for training of AONB partnership members and local authority members and officers (e.g. in Planning –as identified above, Highways, etc.) to raise their awareness and understanding of their role in the delivery of AONB purposes – including induction training, attendance at national conferences, shared Member training etc. The AONB teams may be able to provide some local training and CPD but there could and should be more national and collaborative training, both between AONBs and with the National Parks. The National Association for AONBs would be an obvious body to co-ordinate such activity but is currently not adequately resourced to deliver this in Wales.

J. AONB partnerships commissioned and resourced on a long term basis to provide a core AONB staff team with the critical mass and capacity to deliver the AONB Management Plan and the functions outlined in Valued and Resilient.

- 5.4. ‘Valued and Resilient’ identifies a number of key ‘asks’ or expectations of Designated Landscapes, including “the ability to function effectively at a national level to inform and influence strategic priorities and plans, whilst maintaining a credible mandate and the relationships necessary to deliver within a local area.” Currently AONB teams across Wales, individually and collectively, do not have the capacity to meet all these expectations. All AONB staff are local authority posts. The largest AONB team is Clwydian Range & Dee Valley AONB with a contingent of 4 FTE core AONB staff overseeing a wider 16 FTE countryside team managing traditional Country Parks etc. within the AONB. The smallest AONB teams are Llyn and Gower with 2 FTE staff. This is between 10 and 100 times smaller than some National Park Authorities.
- 5.5. AONBs are a key delivery mechanism for NRW’s statutory landscape remit, Area Statements/Natural Resources Planning and the wider sustainability and well-being

agendas. The NRW AONB National Partnership Programme has enabled locally targeted coordinated activity at a strategic and landscape level; there is further opportunity and potential for AONBs to act as a focus and deliver place-based management of natural resources, if the capacity of AONB teams was enabled to do this.

- 5.6. Smaller AONB units struggle with the capacity to collaborate with others, or engage with (and influence) national matters affecting them; and all AONBs have benefitted from advocacy and representation provided by the NAAONB. This relationship has been particularly beneficial through the Future Landscapes Wales programme, but there is no formal arrangement or resourcing for this to continue. Currently there is a predicted reduction in capacity of both local AONB staff capacity and the 'national' bodies (NRW & NAAONB) to represent AONB interests. For example due to budgetary constraints the Wye Valley AONB Unit is having to reduce the hours of the AONB Information Officer, despite the recent Governance review identifying that 'communications' was a key area that needed consolidating.
- 5.7. Compared to National Parks, the profile and national importance of an AONB is often not reflected at the local level, with a need for better levels of engagement with local authorities at cabinet or senior management level. The National Park Authority and the National Park Officer are statutory requirements whereas AONB partnerships are non-statutory, non-executive bodies and the local authority employment of an AONB lead officer was only a CCW recommendation. Within a local authority direct 'AONB' activity is usually delegated down to the AONB lead officer and team, there is no requirement to report on AONB activity/delivery (beyond grant funding claims) and AONBs may not be seen as relevant to other priorities in education, social services, housing or transport. AONB teams and AONB budgets are relatively modest in terms of local authority management. Consequently, AONB lead officers do not 'score highly' in local authority Job Evaluation matrices and senior leadership hierarchies, even though they are often engaging with Cabinet members, Assembly Members, Ministers, etc. and are often recognised as 'punching above their weight'. The AONB lead officer should be recognised as an essential post within each AONB and the 'lead advisor' to his or her AONB and Local Authorities, supported by the AONB partnership.
- 5.8. Lots of work goes on in AONBs that are 'hidden' because local authorities do not necessarily recognise it as delivering on AONB purposes e.g. planning services, highways & rights of way improvements, education & youth services etc. This activity is at risk of reducing as a result of continuing budget cuts and spending restrictions. The capacity and critical mass of AONB teams and partnerships to build effective and durable cross-sector networks and partnerships is also in danger of being diminished rather than enhanced with current resourcing levels. Consequently, there is an underutilisation of opportunities provided by AONBs to deliver on Public Service Board (PSB), Well-being Plans and Well Being of Future Generation goals.
- 5.9. Security of core funding from Welsh Government via NRW and from the constituent local authorities is an ongoing concern for the AONB partnerships and lead officers. Providing certainty enables long-term planning for the AONBs and ensures the capacity to lever in significant project funding from other sources. However, the AONB teams need to build and maintain a critical mass of staff and expertise in order to manage diverse projects and prepare and submit funding applications. The current limited capacity of most AONB teams

is a barrier to greater collaboration, leverage and delivery. Ensuring each AONB team has a core of staff to deliver what is expected in 'Valued and Resilient' would help consolidate partnership working and elevate the status and effectiveness of AONBs. The 2003 WAG & CCW publication 'An Introduction to Areas of Outstanding Natural Beauty in Wales' (CCC207) reiterated the findings of a 1998 study that "a team of six people is likely to be needed for most of the AONBs, including an AONB Officer, two Assistant AONB Officers (running projects), two AONB rangers and an administrative assistant." These levels of staffing have never been achieved consistently across all the AONBs in Wales. There are currently 32 staff employed by AONB teams across Wales and many of those are working part time or on reduced hours' contracts. This includes the 16 Countryside staff in one AONB.

- 5.10. 'Valued and Resilient' identifies that for National Parks "Additional support for pressures and projects on a case by case basis has been supported when the opportunity has arisen; this will continue." AONB partnerships would welcome more open access to these resources, but for some AONBs the capacity is not sufficient to capitalise on these opportunities.

L. Welsh Government, NRW, Local Authorities and NGO's to have the resilience and capacity to deliver Valued and Resilient and the statutory purpose(s) of the National Landscapes of Wales.

- 5.11. NRW continue to fulfil the 'national advocate' role for and between Designated Landscapes and to a large extent also on AONB partnerships. This is in line with their statutory role as advisors on landscape issues. However, we believe the capacity of NRW staff is also becoming more stretched and less focused on designated landscapes, to the potential detriment of AONBs and National Parks and the wider landscape of Wales. AONB partnerships have relied on the support of NRW and the NAAONB whereas National Park Authorities have usually had the resources to support their own interests. Previous to the formation of NRW, AONB partnerships were supported with local and national expertise from Countryside Council for Wales (CCW), Forestry Commission Wales and Environment Agency Wales. National Park Authorities invariably had the staff and capacity to employ their own ecologists, tree officers, etc. but AONB teams were never resourced to such an extent and have relied on other local authority staff or local partners such as NRW or Wildlife Trust staff.

- 5.12. The Welsh AONB partnerships, NRW and the NAAONB are eager and committed to continued dialogue, engagement and collaboration with Welsh Government to ensure a realistic, pragmatic and proportionately resourced approach; adapted and adopted for the long term, and aligned with the statement in - 'Valued and Resilient' (page 5): "Designated landscapes are strategic assets and are a key delivery mechanism for the Welsh Government's environmental, social and economic ambitions". In order for the above to be realised, not only is it essential for the Welsh AONBs, NRW and the NAAONB to be adequately and proportionately resourced; it is also essential that capacity within the 'tripartite' group is proportionately maintained in the very short term and enhanced in the medium to long term. Any reduction or imbalance of resourcing and capacity within the tripartite group could significantly destabilise and impact on Welsh Government's aspirations and ambitions in the future management of the Designated Landscapes.

I. Welsh Government and NRW to produce data/statistics cut to each AONB as part of existing data and analysis activity, e.g. tourism, agriculture, population, state of environment,

designated site condition etc., in order to inform the AONB Management Plans and support clearer understanding of the value, profile and significance of AONBs.

5.13. National Parks often have 'Management Plan' teams that are larger than an adjacent AONB team. AONBs have to spend scarce time and resources to collate, cut and analyse national data and statistics. The AONBs collaborate and pool resources where possible but there remain inconsistencies and duplication in effort. However this information is crucial for the evidence base for the AONB Management Plan. Nationally gathered data should be made available for each AONB and it could also be aggregated for the designation and the nation. If this was also done for National Parks it would provide a robust evidence base for the National Landscapes of Wales.



Clwydian Range & Dee Valley AONB

Appendix 1 – Short / Medium / Long term Actions

Long term (eg within 5 years)

- A. A second purpose on “Understanding and Enjoyment” be pursued for AONBs at the earliest opportunity in recognition that all AONB partnerships play a major role in delivering opportunities for outdoor understanding, enjoyment and recreation in Wales. *
- B. Strengthen the CRoW Act Section 85 ‘Duty of Regard to the purpose of AONB designation’ into a ‘Duty of Regard to the purpose of AONB designation and implementation of the AONB Management Plan’.

Medium term (eg within 3 years)

- C. Explore the potential for AONB partnerships to become statutory consultees for planning applications.
- D. Welsh Government to make a ‘national appointment’ to each AONB partnership and these appointees to also sit on the new ‘National Partnership for Designated Landscapes’ alongside AONB partnership chairs and lead officers.
- F. The post-Brexit agri-environment and LEADER replacement schemes to be targeted at delivering the AONB Management Plans and AONB partnerships to have a key role in providing support.

Short term (eg within 1-2 years)

- * In the interim, Welsh Government provides policy confirmation of the ‘supplementary purposes’ for AONBs
- E. AONBs and National Parks to be referred to generally and collectively as the ‘National Landscapes of Wales’ rather than ‘Designated Landscapes’ or ‘Protected Landscapes’, hence the ‘National Partnership for Designated Landscapes’ would become the ‘National Landscapes of Wales Partnership’, etc.
- G. The Minister convenes an annual seminar for CRoW Section 85 public bodies to share good practice on how they are delivering their ‘Duty of Regard to the purpose of AONB designation’ and how the AONB Management Plan is being implemented.
- H. The Minister elevates the AONB Management Plans currently commencing their 5 year reviews by providing a Foreword, formal endorsement when adopted and ensuring supporting policy recognition in Planning Policy Wales (PPW).
- I. Welsh Government and NRW to produce data/statistics cut to each AONB as part of existing data and analysis activity, e.g. tourism, agriculture, population, state of environment, designated site condition etc., in order to inform the AONB Management Plans and support clearer understanding of the value, profile and significance of AONBs.
- J. AONB partnerships commissioned and resourced on a long term basis to provide a core AONB staff team with the critical mass and capacity to deliver the AONB Management Plan and the functions outlined in Valued and Resilient.
- K. The National Association for AONBs is resourced to assist Welsh Government with the establishment and servicing of the new ‘National Landscapes of Wales Partnership’, co-ordinate AONB (& NLW) member training and AONB Performance Monitoring.
- L. Welsh Government, NRW, Local Authorities and NGO’s to have the resilience and capacity to deliver Valued and Resilient and the statutory purpose(s) of the National Landscapes of Wales.

Appendix 2 – AONB Attributes

| AONB | Clwydian Range & Dee Valley | Anglesey | Gower | Llŷn | Wye Valley (Wales only) |
|--|-----------------------------|------------|-----------|------------|-------------------------|
| ATTRIBUTES | | | | | |
| Size of AONB(sq. kms) | 390 | 221 | 188 | 155 | 117 |
| Local Authorities | 3 | 1 | 1 | 1 | 1 |
| Population | 18,960 | 16,556 | 15,800 | 6,108 | 6,341 |
| Special Areas of Conservation | 3 | 5 | 5 | 3 | 3 |
| Special Protection Area | 1 | 3 | 1 | 2 | 0 |
| NNR | 0 | 1 | 3 | 1 | 2 |
| SSSIs | 24 | 32 | 26 | 22 | 21 |
| LNR | 1 | 3 | 3 | 0 | 1 |
| Geopark | 0 | 1 | 0 | 0 | 0 |
| RIGS | 72 | 31 | 0 | 3 | <i>tbc</i> |
| WHS | 1 | 1 | 0 | 0 | 0 |
| Scheduled Ancient Monuments | 95 | 75 | 83 | 55 | 44 |
| Outstanding Historic Landscapes | 3 | 2 | 1 | 1 | 1 |
| Historic Parks & Gardens | 13 | 7 | 5 | 1 | 9 |
| Conservation Areas | 17 | 4 | 17 | 8 | 9 |
| Grade 1 Listed Buildings | 15 | 32 | 4 | 7 | 4 |
| Grade II* Listed Buildings | 43 | 42 | 22 | 12 | 26 |
| Grade II Listed Buildings | 583 | 491 | 105 | 223 | 171 |
| Buildings at Risk | 56 | <i>tbc</i> | 10 | <i>tbc</i> | <i>tbc</i> |
| Heritage Coast (km) | N/A | 50 | 59 | 88 | N/A |
| AONB LA Managed Sites | 22 | 3 | 3 | N/A | 3 |
| Public Rights of Way (km) | 772 | 370 | 415 | 278 | 463 |
| National Trail or <u>Wales Coast Path</u> (km) | 72 | <u>201</u> | <u>61</u> | <u>80</u> | 5 |
| Access Land (ha) | 10,380 | 417 | 3145 | 2077 | 4,690 |
| Common Land (ha) | 6,441 | 521 | 5271 | 938 | 46 |
| Iron Age Hill forts | 10 | 3 | 9 | 5 | 4 |

Map: National Landscapes of Wales

