

## P-06-1302 Protect Mid-Wales' unique Cambrian Mountains: designate them an Area of Outstanding Natural Beauty, Correspondence – Petitioner to Committee, 10.10.22



### Cambrian Mountains Society/ Petitioner's response to Minister's points

Thank you for the opportunity to respond to Minister James' letters (to the Committee Chair and to us). We address each of her points in turn, below.

#### 1. NRW are busy.

We understand that the Clwyd Hills and Dee Valley project is consuming substantial resources; indeed, it appears that it was necessary for additional staff recruitment and training to take place in order to progress the project. We do not expect AONB designation for the Cambrian Mountains to take place overnight. Rather, we want to see

- agreement in principle that the project *should* be undertaken, and
- a commitment to a practicable timetable,

in the course of this Senedd. The designation of the Cambrian Mountains as a protected landscape has been under discussion, one way or another, since 1968; designation was agreed in 1972 but then not implemented. ***Now, not in another 5, 10 or 50 years, is the time!***

#### 2. Current designations need improving

Drawing on the Marsden Review of 2014 and the subsequent Future Landscapes report in 2017, it is clear that improvement to the system of designations is possible. But it is also clear from the time that has elapsed since those reports that this is not just a multi-year but a multi-decade aspiration.

Time is not on our side in mid-Wales: development and afforestation are taking place now. If a decision on designation is postponed until the ideal solution has been devised and the legislation drafted and implemented, it is quite possible that the natural beauty of these uplands will have been degraded beyond the point where designation under whatever new framework is settled upon is no longer appropriate. Action is needed in the short term; the designation can then, once the new scheme is in place, be migrated across to it along with the migration of the currently designated landscape.





### 3. An all-Wales technical assessment of natural beauty coming in 2-3 years.

NRW perform regular LandMap assessments, most recently in 2021. Whilst we appreciate that criteria may be modified and an all-Wales exercise will certainly be valuable, we see no reason why designation of a landscape long-acknowledged as meeting the current criteria (since at least the National Park proposal of 1972, itself following recommendations made in 1968) should await yet a further round of assessment. We attach copies of the several NRW assessments relied upon in the Technical Report produced by White Consultants for the Cambrian Mountains Initiative (“CMI”), referred to below, which demonstrate clearly that the Cambrian Mountains meet the statutory criteria for designation.

### 4. Local support

Our local support speaks for itself in the form of the 12,500 signatures we have collected, the vast majority collected at local events including the Royal Welsh Show, National Eisteddfod and other Ceredigion events and venues over the summer of 2022.

Should further evidence be required, we also rely upon the Technical Report drawn up for CMI by White Consultant in 2019 following an extensive programme of local consultation with Town and Community Councils around the Cambrian Mountains. For ease of reference (the report being a very long document) two of the tables summarising the results of that consultation are set out below (with numerical scoring added). In summary, AONB designation was strongly favoured by CMI’s consultees compared to all other models other than a ‘customised’ solution: introduction of a French model, which exists nowhere in the UK and is funded under a French model of local taxation (unlikely to be possible in Wales). The French model’s combined score was 27, compared to 26 for AONB; the differential is meaningless compared to the legislative and political difficulty of bringing it into existence. Indeed, if the score of ‘uncertain’ which the consultation gave to AONB designation under the theme of ‘flexibility’ were instead the more appropriate ‘positive’ (since flexibility is one of the very highlights of the AONB Partnership model) then AONB designation would be the highest scoring, preferred option. It is further noteworthy that the French model scores a negative rating on the theme of bureaucracy, while the AONB model is not rated negative for any theme or topic.

### 5. Past campaigning in favour of a National Park

CMS, founded in 2005, has since 2006 consistently campaigned for AONB designation. We have sound justifications for our proposal as it stands. We are not currently campaigning for a National Park designation, and have no plans to do so in the future.





6. Is the CMI approach (“bottom up”) to be preferred and have CMS aligned our different, sometimes conflicting, approach to protection?

It was in fact the outcome of the ‘bottom up’ consultation process undertaken by CMI, carrying out local meetings and discussions as part of their survey, set out in White Consultants’ resulting Technical Report, which inspired us to re-launch our campaign seeking AONB designation. The AONB campaign is accordingly equally as ‘bottom up’ as CMI’s proposal for discussion.

In any event, we do not consider that there is any conflict in practice between the approaches to protection. The AONB model itself is very similar to the Regional Natural Park model, in that the latter is managed by a *syndicat mixte*, a local authority grouping which is a public corporation in charge of the implementation of the Park charter, a territorial project approved by all members. An AONB is managed by an AONB Partnership which comprises the relevant local authorities and other stakeholders or representatives of stakeholder groups. The AONB Partnership implements the AONB Management plan which is drawn up in consultation with stakeholders. The area covered by the Regional Natural Park is agreed between the participating communities; we assume that the discussion of area to be included within an AONB would, likewise, include an opportunity for the relevant communities to input.

7. Has CMI progressed their proposal at all?

In order to respond to this question we have spoken to CMI, who tell us that they were contracted only to commission and supervise the preparation of the report by White Consultants. We understand that they had not planned to do any further work, and have had no further engagement with the issue of designation.



# WHITE CONSULTANTS TECHNICAL REPORT CHARTS 2 AND 4 WITH NUMERICAL SUMMARIES







# Consistency matrix: themes

	Bureaucrati	o ni tion	Coordination	Definition	Designation	density	Representation	Flexibility
National Park	negative response	positive response	strong positive response	strong positive response	negative response	strong positive response	positive response	negative response
AONB	positive response	positive response	positive response	strong positive response	positive response	strong positive response	positive response	uncertain
Biosphere Reserve	positive response	positive response	uncertain	positive response	uncertain	positive response	positive response	positive response
Geopark	positive response	positive response	uncertain	uncertain	uncertain	positive response	positive response	positive response
National Scenic Area (Scotland)	strong positive response	uncertain	negative response	strong positive response	positive response	positive response	negative response	negative response
French Regional Natural Park	negative response	positive response	strong positive response	strong positive response	positive response	strong positive response	strong positive response	uncertain
Scottish Regional Park	positive response	positive response	uncertain	strong positive response	positive response	uncertain	uncertain	negative response
English Regional Park	positive response	positive response	uncertain	strong positive response	strong positive response	positive response	positive response	positive response
Welsh Valleys Regional Park	negative response	positive response	strong positive response	strong positive response	uncertain	strong positive response	strong positive response	positive response

Colour code: strong positive response positive response uncertain negative response

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## Consistency with combined themes

Scoring: **Strong positive = 3** **Positive = 2** **Uncertain = 0** **Negative = -1**

• National Park	10
• AONB	16
• Biosphere Reserve	12
• Geopark	10
• National Scenic Area (Scotland)	7
• French Regional Natural Park	13
• Scottish Regional Park	6
• English Regional Park	12
• Welsh Valleys Regional Park	13





# Consistency matrix: topics

	Access	Community	Planning	Land	Economy
National Park	Strong positive response	Positive response	Strong positive response	Positive response	Positive response
AONB	Positive response	Positive response	Positive response	Positive response	Positive response
Biosphere Reserve	Uncertain	Positive response	Uncertain	Uncertain	Positive response
Geopark	Uncertain	Uncertain	Uncertain	Uncertain	Uncertain
National Scenic Area (Scotland)	Positive response	Uncertain	Uncertain	Uncertain	Uncertain
French Regional Natural Park	Positive response	Strong positive response	Strong positive response	Strong positive response	Strong positive response
Scottish Regional Park	Strong positive response	Uncertain	Uncertain	Uncertain	Uncertain
English Regional Park	Positive response	Uncertain	Positive response	Uncertain	Positive response
Welsh Valleys Regional Park	Uncertain	Strong positive response	Positive response	Positive response	Positive response

Colour code: strong positive response positive response uncertain negative response

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## Consistency with combined topics

Scoring: **Strong positive** = 3 **Positive** = 2 **Uncertain** = 0 **Negative** = -1

- National Park 12
- AONB 10
- Biosphere Reserve 4
- Geopark 0
- National Scenic Area (Scotland) 2
- French Regional Natural Park 14
- Scottish Regional Park 3
- English Regional Park 6
- Welsh Valleys Regional Park 9



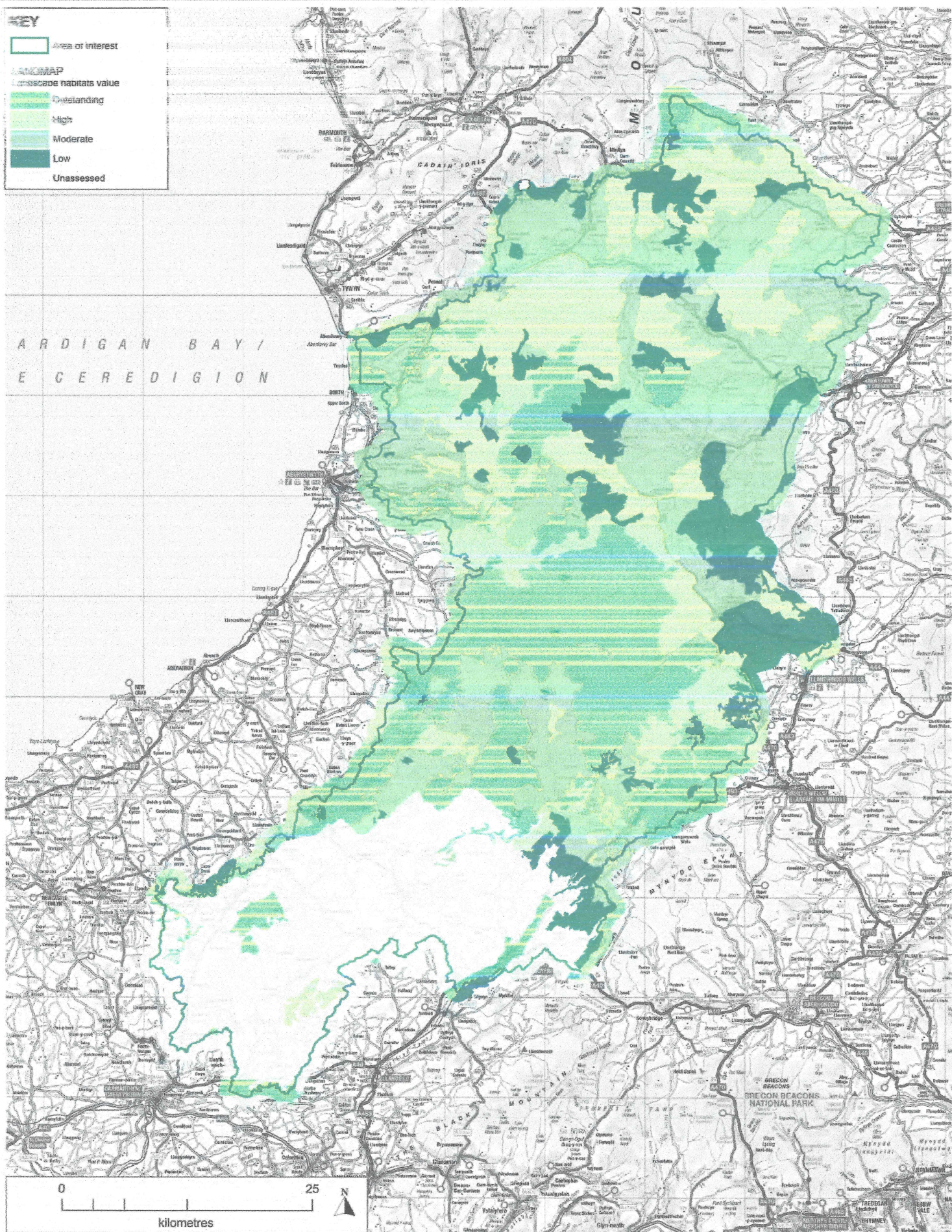


## Overall ranking

- National Park
- AONB
- Biosphere Reserve
- Geopark
- National Scenic Area (Scotland)
- French Regional Natural Park
- Scottish Regional Park
- English Regional Park
- Welsh Valleys Regional Park







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**Figure A7 - LANDMAP**  
**Landscape habitats value**



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Project: Landscape Status for the Cambrian Mountains - a feasibility study  
 Client: Cambrian Mountains Initiative  
 Date: April 2019  
 Status: Final

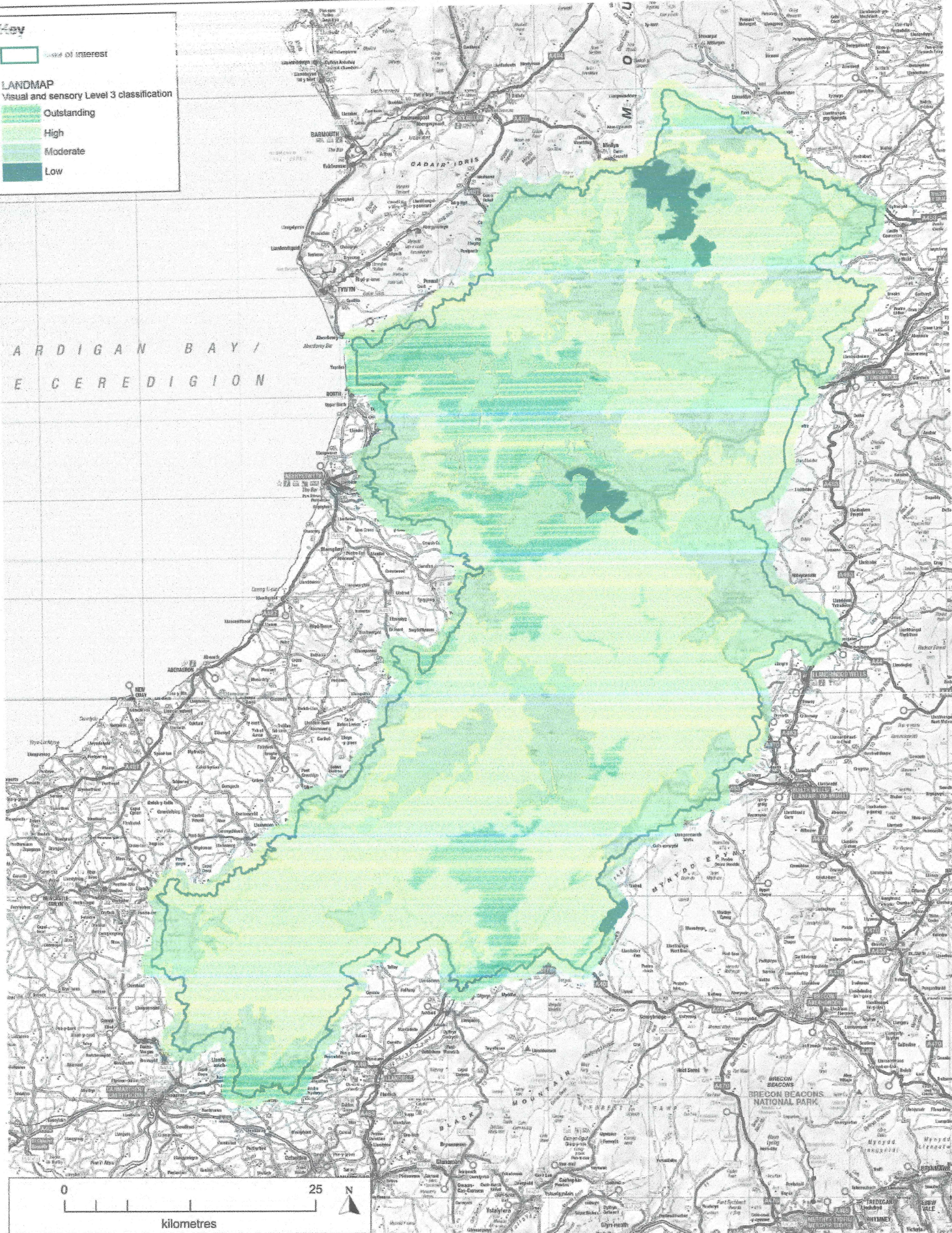


**Key**

Area of Interest

**LANDMAP**  
Visual and sensory Level 3 classification

- Outstanding
- High
- Moderate
- Low



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**Figure A9 - LANDMAP**  
**Visual and sensory value**



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Project: Landscape Status for the Cambrian Mountains - a feasibility study  
 Client: Cambrian Mountains Initiative  
 Date: April 2019  
 Status: Final



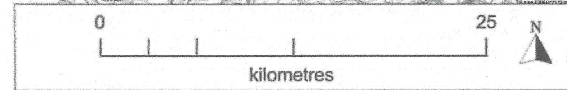
KEY

— Area of Interest

LANDMAP  
historic landscape value

- Outstanding
- High
- Moderate
- Low

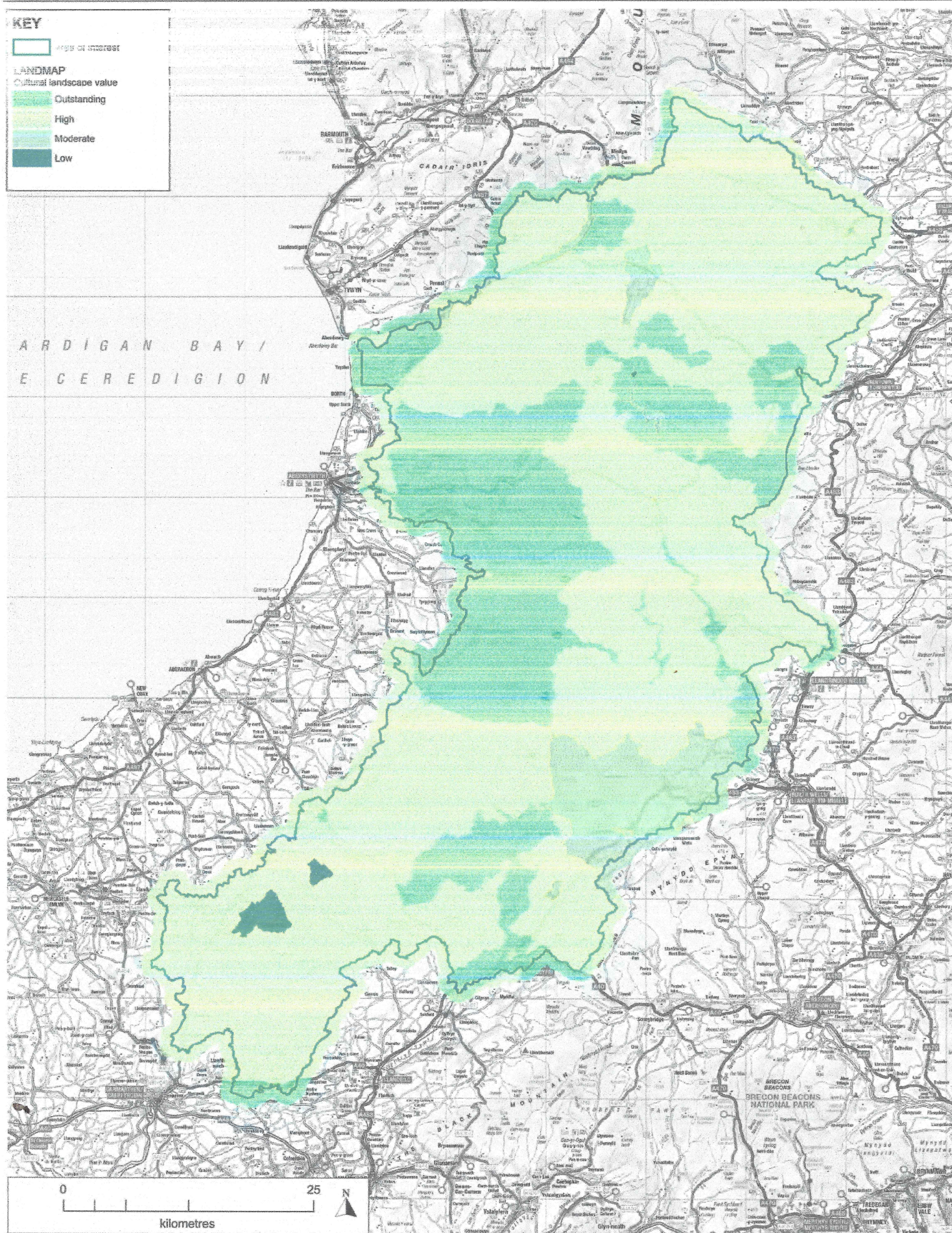
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E C E R E D I G I O N



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Figure A10 - LANDMAP  
Historic landscape value





**Figure A11 - LANDMAP**  
**Cultural landscape value**