



1. Introduction

1.1 The Campaign for the Protection of Rural Wales (CPRW) is Wales' foremost landscape charity. Our aims as a campaigning organisation are, to raise public and political awareness of the value and role of Welsh landscapes as resources which are not only contribute significantly to the nation's well-being significance but are also of international importance.

1.2 We believe that landscapes when responsibly cared for and their management adequately resourced, are capable of delivering **all** the well-being outcomes the Welsh Government seeks in promoting the sustainable development ambitions outlined in this Draft Bill.

1.3 CPRW therefore welcomes the opportunity to comment on the content of this initial version of the Draft Bill and offers our provisional support in principle for its approach. We believe however that some important refinements and additions to the Bill are necessary if it is to be effective. These we outline hereafter.

2. Recommendations

2.1 CPRW invites the Committee to address the following "Issues of Concern" to ensure the Bill eventually fulfils its Well-being aims in a fully comprehensive and integrated manner.

To do this, we therefore recommend the Bill must include specific provisions which:

- 1:** Define the term "Sustainable Development", in a way which enables this approach to be unambiguously understood and implemented
- 2:** Refer to the need for defined and agreed environmental thresholds to ensure sustainable development is facilitated in a responsible manner.
- 3:** Clearly articulate environmental well-being as an intrinsic and critical component of national well-being.
- 4:** Accept that if an irreconcilable conflict arises when seeking to fulfil any of the three individual dimensions of the Sustainability "Common Aims" of the Bill, safeguarding the integrity of environmental well-being will prevail.
- 5:** Ensure that the status, integrity and resilience of Wales' most iconic landscapes, (three National Parks and five AONBs), to ensure that the fundamental contribution these areas make to the nation's overall public well-being is safeguarded.
- 6:** Ensure that every National Park Authority is classified as constituent member of any Public Service Board established within its respective areas.
- 7:** State that a refined version of an existing Protected Landscape Management Plan is recognised as the Well-being Plan for that part of the constituent Local Authority area within which that Protected Landscape is located.

3. Evidence to support our Proposals

3.1 CPRW strongly contends that Wales' landscapes are important not only because of the diversity and quality of their scenic qualities but also because they are the invaluable frameworks which inextricably link nature with culture, the past to the present and man with his environment in a distinctively Welsh way.

3.2 Welsh landscapes also provide a multitude of benefits and act as our "daily life support systems." Not all of these benefits are physical, tangible or have a recognisable market values, indeed some are immeasurable but still of enormous personal and psychological significance. The characteristic "Sense of place" and "Y Cynefin" Welsh landscapes create therefore underpin the quality of Welsh life, the national well-being of Welsh people and act as powerful economic and tourist resources for the many who visit and enjoy Wales.

3.3 We therefore contend that high quality, resilient and healthy landscapes create healthy nations and an economically prosperous and healthy society. Distinctive landscapes are an unmistakable and crucial dimension of the well-being of 21st century Wales. Any Bill therefore which promotes well-being and does not recognise this fact and the immeasurably contribution Welsh landscapes make to public's well-being, is therefore in our view inadequate.

3.6 As signatories to the European landscape Convention, we contend the Welsh Government through this Bill, must give due recognition and include specific provisions which ensure that the landscapes of Wales are recognised as important dimensions of the nation's wellbeing and are thereafter safeguarded and managed so they continue to contribute to the future public well-being and at the same time help achieve the sustainable ambitions of this Bill.

3.7 CPRW therefore contends this Bill must include provisions which clearly link the approach to future public well-being with the protection and need to facilitate the responsible stewardship of all Welsh landscapes and seascapes.

Detailed critique of the Bill

4. CPRW's Issues of concern: Nos 1, 2 and 3

- The Bill does not adequately define the term "Sustainable development"
- The Bill does not recognise the fact that Sustainable development can only be achieved within prescribed Environmental limits
- The Bill does not adequately recognise that the quality and diversity of the Welsh environment is an inherent and important dimension of Welsh public life and contributes significantly to personal, social and economic well-being.

4.1 Context

4.1.1 Part 1 Para 3 expresses the Sustainable development approach the Bill seeks to promote as: "*seeking to ensure that the needs of the present are met without compromising the ability of future generations to meet their own needs*"

4.2 Response

4.2.1 The use and interpretation of the words “sustainable development” and “principle” are wholly inappropriate and inadequate.

4.2.2 If provisions of the Bill are to be implemented in an objective, practical and measurable way then the term Sustainable development must be clearly defined. The current wording is an aspirational representation of the concept of “Sustainability and intergenerational equity” and not one which defines the necessary parameters which would enable judgements to be made about whether development or change is sustainable. In particular the definition does not recognise the accepted Welsh Government principle that sustainable development can only being achieved within defined environmental thresholds and limits.

4.2.3 In addition, if performance in achieving Sustainable development is to be measured, any description of this term must be expressed objectively and in assessable terms. Referring to Sustainable development merely as a “principle” is not we believe prescriptive enough and should be deleted in favour of a clear definition of the term.

4.3 CPRW’s recommended Amendments to the Bill

1. The word “*principle*” is deleted from the title “Sustainable development principle” in Page 1 para 3
2. The existing definition of sustainable development on Page 1 Para 3 is replaced by the following
“...development which, within defined environmental limits, secures social, economic or environmental benefit, in ways which does not compromise the integrity of any of these individual elements or aspirations nor the ability of future generations to meet their own needs”
3. The wording of the Goal of “A resilient Wales” on Page 3 Para 6 (1) Table 1 is amended to read

A resilient Wales	<i>A rich and diverse natural and cultural environment, where the range and integrity of healthy and functioning ecosystems are maintained within accepted environmental limits and remain able to meet future social and economic needs in a responsible manner.</i>
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5. CPRW’s Issue of concern: No 4.

- The Bill does not provide any indication of the priority of the stated Well-being Goals in circumstances where the pursuance of one may result in irreconcilable conflict with another.

5.1 Context

5.1.1 Nowhere in provisions of the Bill is the significant contribution or public benefits that the natural and cultural qualities of well cared for landscapes and seascapes make and contribute to the quality of Welsh life and public well-being fully recognised.

5.1.2 Additionally the Bill does not indicate (Page 3 -5 Para 6- 8), that in the event of there being a conflict of interest when pursuing any of the six Wellbeing goals, which of these takes precedence.

5.2 Response

5.2.1 The Bill must include provision to safeguard the wellbeing role that high quality and diverse Welsh landscapes and seascapes current provide and recognise the contribution that all designated areas of environmental importance (especially the three National Parks and five AONBs) contribute to the nation's sense of identity, quality of life and overall public well-being.

5.2.2 Given the multi dimension role of Well-being, in those instances where the retention of environmental resilience is paramount in ensuring national well-being, the well-being Goal of ensuring "A resilient Wales" must have primacy

5.3 CPRW's recommended Amendments to the Bill

1. Add a new sub paragraph 6 (5) on Page 4 as follows

"Where the promotion of one aspect of Well-being as contained in the Common aim or equally in pursuance of a specific Well-being Goal, results in an irreconcilable conflict with the Goal of maintaining the integrity of "A resilient Wales", the latter would take precedence."

6. CPRW's Issues of concern: Nos 5, 6 and 7

- The crucial national role that Wales' National Parks and Areas of Outstanding Natural Beauty play in furthering public well-being is not recognised and hence not appropriately safeguarded.
- Given the significant role that National Parks and AONBs contribute to the nation's well-being, their role as a constituent member of any Public Service Board, within their respective area, should be guaranteed.
- National Parks and AONBs have Management Plans produced in collaboration with relevant stakeholders which has sustainability as its core principle. These Plans subject to refinement, should be recognised and regarded as the Well-being Plans for that part of their constituent Local Authority areas.

6.1 Context

6.1.1 The resources and ecosystems within the Protected Landscapes of Wales provide fundamental life support services for the nation and are also important and highly valued economic, social, health and learning resources which enhance all public well-being.

6.1.2 The coordination and integration of activities within Protected Landscapes is currently the responsibility of National Parks Authorities and AONB Partnerships. These organisational systems are best placed to promote sustainable approaches to planning, resource use and public management in their areas.

6.1.3 Equally National Park and AONB Authorities currently have a statutory obligation to prepare and implement Integrated Management Plans for their respective areas. These Plans have the sustainability of the natural and cultural resources of these area, the welfare of local communities and the general well-being of the visiting public at their core.

6.2 Response

6.2.1 The current provisions of the Bill recognise neither the crucial national role nor their front line function that Wales Protected landscape play in achieving public well-being, social enrichment and economic prosperity. This role should be recognised and is best achieved if National Park Authorities in particular are specifically named as “constituent members” of any Public Service Boards established within their respective areas.

6.2.2 Given the current scope, legal status and sustainability focus of Protected Landscape Authority’s work, refinement of the scope of their statutory Purposes and the Management Plans for their areas, would enable these document to be endorsed as the Well-being Plans for these environmentally sensitive areas. The provisions of the Bill should acknowledge and facilitate this proposal.

6.3 CPRW’s recommended Amendments to the Bill

- An additional criterion is added to Section Part 2 after Para 8 (2) (b) namely

“The body’s objectives would avoid impacting on the integrity of the special qualities of any area designated because of its international or national landscape or nature conservation importance”

- Add an additional category of member to those currently listed at Part 4, Public Service Boards, Para 27 (2) namely

“A National Park authority for a National Park in Wales any part of which falls within the local Authority area”

- Delete reference to “A National Park authority for a National Park in Wales any part of which falls within the local Authority area” Page 16 Part 4 “Other Partners” at Paragraph 30 (1) (d)

- Add on Page 21 Chapter 2 “Local Well-being Plans” after Para 37 (7) and before Para 37 (8)

“A Well-being plan for any National Park or Area of Outstanding Natural Beauty or part of it in Wales, must give primacy to safeguarding and enhancing the integrity of any special quality which characterises these internationally designated areas.”

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