



Organisation: The Cambrian Mountains Society (CMS)

President: Iolo Williams

Acting Chairman: Mr. Peter Foulkes

email

Address:

Tel:

Website: www.cambrian-mountains.co.uk

CONSULTATION RESPONSE ON: THE DRAFT NATIONAL DEVELOPMENT FRAMEWORK 2020 – 2040 Submitted by the Trustees of CMS on behalf of the membership

Introduction.

CMS is aware that this consultation exercise is to aid in the design of a new National Development Framework (NDF) for Wales but in this response the Society will concentrate on how such a framework might impact the Cambrian Mountains. Here the Society defines the Cambrian Mountains as that area outlined in the 1972/73 Cambrian Mountains National Park Designation Order. Further details of the Vision and Objectives of the Society as well as a means of accessing its Strategy Document can be found at the end of this response.

But first, can the Society draw your attention to what must be an omission on page 2 of the draft document – the map of Wales. The map shows the areas protected as National Parks (NPs) but does not show the 4/5 Areas of Outstanding Natural Beauty (AONBs) in Wales, even though they are regarded as equals in the designated landscape family.

And second, the Society would like to question the title “National Development Framework” as well as the ideas promoted in the Introduction (page 6) and beyond. The Society considers that the emphasis has been put on “Development” which CMS takes to mean the built environment. (Every photograph in the draft document features either a building or element of infrastructure, there is no image of undoubtedly one of the Nation’s major assets – its outstanding natural/semi-natural landscapes as exemplified by its NPs and AONBs). As such CMS consider that “National Framework” is a better working title for this WG initiative and in the remainder of this response CMS will use this term. Furthermore in this response the Society will refrain from using the term “natural resources” when discussing landscape, habitats and biodiversity as it feels this term commoditises the natural world.

CMS will not be going through all the questions from the Consultation Document but will concentrate on those that it feels have a direct bearing on the well being of the Cambrian Mountains - the landscape, local communities, biodiversity and cultural heritage. This area, through NRW’s and consequently WG’s own mapping tools forms a large **landscape character area (no. 21)** at the very heart of Wales.

The Society is, however, very aware of the potentially extremely damaging “developments” proposed in this draft NDF for other rural landscapes and communities across Wales.

2. Spatial Strategies – To what extent do you agree or disagree with the spatial strategy and key principles for development in rural areas (Policy 4)? CMS response – Disagree.

WG should be, via NRW and Local Authorities, promoting the expansion of the Designated Landscapes family across the Nation, to include new NPs and AONBs. Looking across the border to

England, the recent Glover Review report suggests that several new areas, such as the Forest of Dean and the Sandstone Ridge of Cheshire, be considered for landscape designation.

Returning to Wales, the Cambrian Mountains have long been a strong candidate for either NP or AONB status. Again CMS reiterates that WG's emphasis on "Development" should not be done at the expense of the Nation's outstandingly beautiful landscapes, which are an essential part to the "National Framework". Neither do CMS see alternative designations such as that proposed as the Valleys Regional Park (Policy 38) as suitable for the Cambrians. When Alun Davies AM, in the foreword to The Valleys Regional Park Prospectus(2018), suggested that -

"The Valleys Regional Park is not a one-off project or initiative. The intention behind the Valleys Regional Park is that we put the Valleys in the vanguard globally, with a national and international profile, by creating a new type of formally-designated landscape."

he seems to have forgotten that Wales already has a well established and well respected system of Designated Landscapes including the very first AONB in the UK –Gower. What might be suitable for a post-industrial landscape is not right for a large area of outstanding landscape quality. Let us not forget that as long ago as both the Dower Report (1945) and the subsequent Hobhouse Report (1947) recommended that large tracts of mid Wales as being suitable for National Park/Conservation Area* status.

*Conservation Areas subsequently evolved into AONBs.

6. Green Infrastructure – To what extent do you agree or disagree with the approach to maintaining and enhancing biodiversity and ecological networks (Policies 8 &9)?

CMS response – Agree, with caveats.

CMS acknowledges that the two bullet points* from the "strategic framework for biodiversity enhancement and ecosystem resilience" page 33 (Policy 8) are, on paper at least, are a step in the right direction. But the plans lack detail!

Over recent years the importance of the landscape scale, or ecosystem approach, to conservation has come to the fore as a means for both reducing biodiversity losses and maintaining/improving ecological integrity. What better test-bed for such an approach than the newly created Cambrian Mountains NP or AONB as the area evolves into an important component of the "National Framework." As to the National Forest (Policy 9) - the Cambrian Mountains are very choice area, with its pockets of oak woodland, as well as PAWS,* acting as nurseries for an extensive National Mixed Woodland.

- *"areas which could be safeguarded" AND *"opportunities where strategic green infrastructure"

PAWS* - Plantation Ancient Woodland Sites.

7. Renewable Energy and District Heat Networks (Policies 10 – 15)

To what extent do you agree or disagree with NDF policies to lower carbon emissions in Wales using - - - - large scale wind and solar developments? CMS response – Disagree.

CMS are well aware that Climate Change is one of the most pressing problems facing the World and that the Cambrian Mountains have to play their part in reducing atmospheric carbon dioxide levels. That part, however, can be performed by the large tracts of blanket bog across these hills sequestering carbon. CMS also recognise that the Cambrian Mountains have largely been left untouched by the Wind and Solar Priority areas in the Framework (map, page 42). Perhaps WG now also see the benefits of allowing the area's blanket bogs, a soft solution, playing their part in ameliorating climate change? But large areas of these blanket bog have become degraded, probably by a combination of land management practices and acidified rain. WG, via the "National Framework", should invest into repairing these habitats and, as a consequence, restore important carbon sinks.

CMS views Policy 12, **P11** concerning areas outside priority areas as unacceptable, it effectively says WG can do what they want irrespective of their own carefully planned Wind and Solar Priority Area map. Also **P12** covering solar and wind developments near NPs and AONBs falls short of protecting these areas from damaging developments, in CMS's opinion all landscape designated areas should have buffer zones around them. This is especially the case with the next generation of wind turbines expected to be much taller and therefore having a far greater visual effect over larger distances.

Finally in this section CMS would like to reiterate it's concern for other areas, away from the Cambrian Mountains, a concern it expressed earlier, in para. 5 of the Introduction of this response.

THE REGIONS – 10. Mid and South West Wales (Policies 23-26) CMS response - Disagree

The Region is too large. It is clear from the first para. of this section of the "National Framework" which says "Each region has its own distinctive opportunities" that WG do not appreciate that mid Wales has little connectivity with South West Wales. The vast majority of the section concentrates on South West Wales, namely;

Policy 23 – Swansea Bay & Llanelli,

Policy 25 – Haven Waterway,

Policy 26 – Swansea Bay Metro,

with Policy 24 - Regional Centres – giving a little thought to "sub-regional growth" in mid Wales.

Clearly not a balanced group of regional policies.

13. Habitat Regulations Assessment.

Do you have any comment on the Habitat Regulations Assessment Report?

Although consideration can be found in these regulations covering buffer zones around Natura 2000 sites similar coverage cannot be found for the Protected Landscape designations - NPs and AONBs. CMS are concerned over this not only for existing NPs and AONBs but also for the potential Cambrian Mountains NP/AONB surrounded as it will be by the proposed Wind Priority Areas.

Mr. Peter Foulkes, Acting Chairman
Cambrian Mountains Society.
On behalf of the Society's Trustees.
18th October 2019.

A few details on the Cambrian Mountains Society (CMS)

CMS was formed in 2005 with the following objects:

- *To promote, for the benefit of local communities, and of the wider public, measures which will sustain or enhance the landscape, natural beauty, biodiversity, archaeology, scientific interest, and cultural heritage of the Cambrian Mountains.*
- *To advance the education of the public in the landscape, natural beauty, biodiversity, archaeology, scientific nature, cultural heritage and geodiversity of the Cambrian Mountains.*

CMS is a registered charity (number 1113037) and at present has a membership of around 280. At the heart of the Society's work is that the glorious landscape of Cambrian Mountains might be better protected probably by joining the Welsh family of Protected Landscapes. This could be either as Wales' 4th National Park (NP) or 5/6th Area of Outstanding Natural Beauty (AONB).

Details of the Society's strategy for a sustainable future for the the Cambrian Mountains can be found on the Society's website: www.cambrian-mountains.co.uk, navigating through the menu:→ AONB Campaign → Introduction.