



**CITY AND COUNTY OF SWANSEA**

**DINAS A SIR ABERTAWE**

By Email:

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4<sup>th</sup> November 2014

Dear Professor Marsden

**THE REVIEW OF DESIGNATED LANDSCAPES IN WALES  
GOWER AREA OF OUTSTANDING NATURAL BEAUTY (AONB)**

Thank you for your letter and attachments of 29 September 2014 regarding the above review.

I am responding in my capacity both as:

- Chair of Development Management and Control committee of the City and County of Swansea ('the Council') – the local planning authority responsible for the Gower AONB; and
- Chair of the Gower AONB Partnership - an advisory group to the Council, convened by them, to facilitate the management of the Gower AONB, in fulfilment of their legal responsibilities and duties with regard to the Gower AONB.

The Council and the Gower AONB Partnership welcome the opportunity to engage with the Review and intend to do so as fully as possible.

This response has been developed by the Gower AONB Partnership and officers of the Council with responsibility for managing the AONB. The views expressed are the collective ones of the AONB Partnership, although individual organisations/members of the AONB Partnership may also wish to submit responses to the Review Panel, highlighting issues of particular concern to themselves.

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The enclosed Annex to this letter provides our initial evidence and views on the matters to be considered in Stage One of the Review.

We look forward to our involvement with the Review over the coming months.

Yours sincerely

**Councillor Paul Lloyd**  
**Chair of Gower AONB Partnership**  
**City and County of Swansea**

## **Annex**

### **Gower Area of Outstanding Natural Beauty (AONB) Evidence for Designated Landscapes Review – Stage One**

#### **Introduction and Context**

Gower became the first AONB in England and Wales in 1956. The AONB covers 188 square kilometres of the Gower peninsula, immediately west of Swansea.

The Panel already has a good understanding of the Gower AONB – including its special qualities and natural beauty – and the background and history of the designation; we have therefore not included any detail on these matters here.

The City and County of Swansea ('the Council') is the local authority responsible for the management of the Gower AONB under the Countryside and Rights of Way Act 2000.

We refer you to the current Gower AONB Management Plan (2006) which formulates the Council's policy for the management of the AONB and for the carrying out of the Council's functions in relation to it. A revised AONB Management Plan is out for public consultation until 19 December 2014. Both these documents are available from the following link:

<http://www.swansea.gov.uk/article/2245/Gower---managed-in-partnership...>

The Gower AONB Partnership ('the Partnership') is the advisory body to the Council regarding the AONB and its management. The Partnership works to support the activity of everyone – local landowners, farmers, businesses, visitors, community groups and individuals – in their conservation and enhancement of natural beauty in the AONB. Partnership members represent a wide range of interests. The Partnership Terms of Reference are incorporated into the Council constitution and have been attached with our evidence for your information. The Partnership Steering Group is chaired by the Chair of the Development Management and Control Committee and includes other local councillors, NRW representatives and 10 others elected at the AONB Annual Forum.

Gower AONB has a core-funded team of three; core funding is currently reliant on direct grants from Natural Resources Wales. The Welsh Government Sustainable Development Fund (SDF) is administered by the team and provides valued funding for delivering local projects. Another team of four is engaged on the Gower Landscape Partnership – an Heritage Lottery Fund - supported programme to conserve and celebrate the unique qualities of Gower.

Our evidence is largely based on the Partnership's experience of the AONB designation as it relates to Gower and how we believe that this compares with other protected landscapes in Wales. We confirm that the Partnership has also been involved with the development of the evidence being presented to the Panel by the National Association for AONBs.

Our evidence has been presented below using the questions for Stage One of the Review – as provided in the Review Terms of Reference.

## **Question 1 – Are designated landscapes equipped to meet the current and future needs of Wales?**

### **AONB Statutory Purpose, Management and Governance**

The concept of 'natural beauty' is a long standing one, allowing a broad and flexible approach to the management of protected landscapes. Clarification of the term is provided in the Countryside Council for Wales' 'Statement on Natural Beauty (CCW, 2006).

Local development of the 2006 Gower AONB Management Plan– along with guidance from Countryside Council for Wales - identified the 'special qualities' of Gower under the following four main themes and components:

- **Natural** – Wildlife, Geology, Landscape and Seascape
- **Cultural** - Archaeology, Historic Landscapes, Parks and Gardens, Listed Buildings and Conservation Areas
- **Environmental** – Quality of Air, Water, Soil and Tranquillity
- **Recreational** – Rights of Way Network, Access Land and Beaches

The AONB Partnership Steering Group is responsible for preparation of the AONB Management Plan and the coordination of its implementation. National guidance is provided by Natural Resources Wales – with representation on the Steering Group and a specific role to advise on the management plan under the Countryside and Rights of Way Act.

The AONB Partnership meetings are also opportunities for local debate on relevant issues affecting the AONB and the communities that live there. Recent topics have included affordable housing and broadband connectivity. However, the Partnership has no planning function – it does not debate (or provide a view to the local planning authority) specific planning applications affecting the AONB. Planning applications do often raise very relevant topics for debate (a recent application for solar energy development within the AONB being a good example). However, such debate is difficult as county councillors on the Steering Group also sit on Council planning committees (that determine planning applications) and must ensure they avoid any element of predetermination.

### **Management Planning and Reporting**

The AONB management plan process is considered to provide a robust framework for identify priorities for management. However, the ongoing review of the Plan has raised issues and difficulties around:

- Resources for delivery – priority actions are identified within a five year action plan, but delivery is dependent on availability from existing budgets (see below) and/or securing funding from other sources;
- The ability of partners to make firm commitments to plan delivery;
- Compiling reporting on actions and monitoring by partners – particularly as reporting mechanisms are often aligned to other responsibilities; and
- The low profile of the national accountability that the Council and Partnership have to conserving and enhancing the AONB.

We suggest that some of these issues could be addressed in the future by strengthening the statutory requirements of public bodies in the conservation and enhancement of natural beauty in designated landscapes by expecting their:

- Participation in the preparation of the management plan
- Confirm how they will actively fulfil their roles and duties in the area; and
- Report on how they have contributed to its delivery.

## **Resources and Delivery**

As well as the AONB Team, a number of other teams directly contribute to delivery of AONB management, particularly:

- Nature Conservation;
- Countryside Access;
- Planning Policy;
- Planning Control.

A range of other areas of Council services also support or link with delivery of AONB purposes e.g.:

- Highways;
- Democratic Services;
- Culture and Tourism.

So, although the discrete AONB team is small, indirect local authority expenditure on AONB management will be much more significant; however, alignment of reporting and budgeting is across the authority – not just within the AONB – so it is difficult to give direct costs or make comparisons with costs in other AONBs or National Parks. Similarly, this arrangement presents difficulties with collating and reporting information and progress with actions and condition of the AONB.

To summarise the local context to current public sector reform and budgets:

- Gower AONB will be likely to remain within the boundary of a single local authority - whether or not Swansea merges with any neighbouring authority as part of the review of local government;
- In the short-term, the City and County of Swansea need to reach a savings target of £70M over the next three years;
- The Council programme to deliver these targets and shape Council service change is outlined in 'Sustainable Swansea: Fit for the Future'.

Local authority resource for AONB management is subject to these pressures as much as any other Council service or duty. Other sources of funding and support are becoming increasingly important for the positive management of the natural beauty of the AONB. The Gower Landscape Partnership is the key example of this: the Council has been committed to acting as the lead body in the development of the GLP programme and in its current delivery. The AONB Partnership members have worked collaboratively to develop and agree outcomes for the programme.

## **National Collaboration, Policy and Leadership**

The NAAONB response to the Review draws attention to the current collaborative approaches of the NAAONB and our colleague AONB units in Wales. From the Gower AONB Partnership perspective, we continue participate in - and gain value from – these approaches.

We support the NAAONBs call for a clear national leadership role for Natural Resources Wales for Protected Landscapes.

## **Coastal and Marine Issues**

As a coastal peninsula, much of the natural beauty of Gower is derived from its relationship with the sea. Many of the key areas have elevated views, presenting wide panoramas of open, undeveloped sea and distant views of Pembrokeshire and the English coast. The landscape/seascape is of great sensitivity to coastal and offshore developments.

In addition, much of the recreational use and opportunities of Gower are associated with the coast and inshore waters – surfing, diving, coastering, fishing, boating and canoeing.

However, the AONB designation only includes land within the local authority area down to low tide. There is currently limited scope for management to positively address issues in the associated marine area that affect the AONB. The Partnership would welcome the Review Panel's investigation and consideration of how best to address this. Clearly the current development of the Marine Plan for Wales is relevant in this regard.

## **Question 2 - Should there be a single designation of protected landscape in Wales?**

### **Protected landscapes and their status**

The Review Panel members are already aware of the statutory context for the designations of National Parks and AONBs in England and Wales, as well as their historical evolution and development.

The Partnership supports the widely accepted principle that AONBs and National Parks are of equal status in terms of their scenic quality – their distinctive character and natural beauty are so precious that it is in the nation's interest to safeguard them. The Partnership applies the interpretation of 'natural beauty' given in CCW's Statement on Natural Beauty (2006).

Gower AONB (in common with the other AONBs and National Parks in Wales) is internationally recognised as a Category V protected area by the International Union for the Conservation of Nature (IUCN):

**Category V:** A protected area where the interaction of people and nature over time has produced an area of distinct character with significant ecological, biological, cultural and scenic value: and where safeguarding the integrity of this interaction is vital to protecting and sustaining the area and its associated nature conservation and other values.

Whatever the recommendations or outcomes arising from the Review, the Partnership feel strongly that the designation, purposes and governance for Gower (as a protected landscape) should ensure that this national and international recognition is continued.

### **Current statutory purposes and practice**

The Partnership understands that the derivation of National Parks and AONBs as two different designations has arisen as a function both of their size/scale and (for National Parks) the opportunities they afford for 'open-air recreation'.

Accepting that Gower is of a smaller scale than the National Parks of Wales, the AONB is still a landscape of natural beauty that provides opportunities for open-air recreation. For example, Gower:

- Is within an easy 30-minute drive of more than 10% of the population of Wales, including Swansea as Wales' second largest city.
- Has a public rights of way network of more than 400km, including 60km of the Wales Coast Path
- Includes more than 3100 hectares (16.7% of the AONB) with rights or permissions for public access e.g. open country under the CRoW Act 2000, NRW public forest estate
- Has more than a dozen beaches, including four blue flag beaches

The attraction of this resource is reflected in the number of visitors to the area and the reasons that they visit. The wider Swansea Bay area welcomes more than four million visitors every year, most of whom would have visited the AONB. A 2012 visitor survey found that the factors which most influenced their decision to visit the area were the coast (44%), scenery/landscape (44%) and beaches (35%). Low level walking (2-8 miles distance) has been the most popular activity undertaken by surveyed visitors every year since 2005 (and 52% of visitors in 2012).

Visitors are welcome on Gower and are important to the local economy; however recreation activities and related infrastructure have environmental impacts on natural beauty and the special qualities of the AONB e.g. landscape/visual impacts from static caravan sites, traffic and parking congestion at peak times, erosion of footpath routes.

AONB management must be focussed on the statutory purpose of the designation – to conserve and enhance the natural beauty of the area. However – given the above context – the Council and the Partnership recognise the need to act as if the AONB includes the second purpose given to National Parks – ‘to promote opportunities for the public understanding and enjoyment of the area’s special qualities’.

At this point, it is worth highlighting that public understanding and enjoyment of the AONB is necessary and integral to the conservation and enhancement of its natural beauty – through understanding and the enjoyment the area, people come to value to the landscape and are prepared to respect and support its conservation and enhancement.

The consultation draft of the Gower AONB Management Plan addresses the need to provide opportunities for providing open air recreation. The Plan includes a framework for managing recreation resources, and raising public awareness and understanding of the AONB.

### **Natural Resource Management and the Well-being Goals for Wales**

We note and welcome the clear direction the Review Panel has to consider how designated landscapes can best deliver natural resource management and pursue achievement of the six well-being goals for Wales – as set out within the Well-being of Future Generations (Wales) Bill.

The Partnership suggest that - for Sustainable Development to be the central organising principle - the well-being of current and future generations should be integral to the statutory purposes of designated landscapes in Wales.

In this context, we suggest that the statutory purposes for designated landscapes in Wales could be revised to have two simple and clear purposes:

- To conserve and enhance beauty, wildlife and cultural heritage of the area
- To improve the well being of current and future generations

We assert that the Welsh National Parks and AONBs are all nationally important landscapes and deserve the same consideration in terms of their definition and statutory purposes.



## **Summary Conclusions**

- The Council and the AONB Partnership welcome the opportunity to support and participate in the Designated Landscapes Review
- As AONBs and National Parks are both nationally important landscapes, there is much merit in considering how they can be brought into one type of designation
- The designation and its definition should continue to recognize existing protected landscapes as being of national value and comply with the international standards of protected areas.
- With one designation type, the statutory purposes of the designation should be the same for all
- Those statutory purposes should continue to conserve and enhance the natural beauty of the designated landscapes and should include strong links to the well-being goals for Wales.

**Prepared by:**

**Chris Lindley  
Gower AONB Team Leader on behalf of the  
Gower AONB Partnership**

**October 2014**