

Ymgyrch Diogelu Cymru Wledig Campaign for the Protection of Rural Wales



Cadeirydd Chairman Dr Jean Rosenfeld
Cyfarwyddwr Director Peter Ogden

Mr Paul Mitchell,
Countryside Officer
Countryside Council for Wales
Plas Penrhos
Penrhosgarnedd
BANGOR
Gwynedd

January 27th 2011

Dear Mr Mitchell

Proposed extension of the Clwydian Range AONB Submission by the Campaign for the Protection of Rural Wales (CPRW)

As Wales' foremost countryside charity, CPRW welcomes the opportunity to submit its observations on this important issue which has a fundamental influence upon my organisation's interests and the future of other important landscapes elsewhere in rural Wales.

CPRW wholeheartedly endorses the principle that the existing area of the Clwydian Range AONB is extended and believes that there are compelling, legitimate, justifiable and practical reasons why this extension should be sanctioned. We believe that this extension will bring significant environmental, economic and social benefits.

We therefore trust that our observations prove relevant and acceptable and look forward to our conclusions being applied sanctioned quickly and enthusiastically by CCW.

Should there be any matters which require further clarification, then I will gladly do so upon your request.

Yours Sincerely,

Peter Ogden
Director

Countryside Council for Wales Consultation

**Consultation on the
Proposed extension of the Clwydian Range AONB**



**Submission by
the Campaign for the Protection of Rural Wales (CPRW)**

January 2011

1. Context for our response

- 1.1 As Wales' foremost countryside charities, CPRW welcomes the opportunity to respond to this current exercise to scrutinise the legitimacy of extending the existing boundaries of the Clwydian Range AONB.
- 1.2 This corporate response therefore represents the perspective and conclusions of both CPRW's National Head Office and its Clwyd and Wrexham Branches which actively engage as local environmental watchdogs for this part of Wales in the guardianship of this area.
- 1.3 CPRW believes that this exercise is long overdue and given our direct interest and involvement in ensuring that all those areas of Wales which are national landscape importance merit appropriate recognition, we welcome the opportunity to offer the following submission

2. The case for extension of the current AONB

- 2.1 **CPRW wholeheartedly endorses the principle that the existing area of the Clwydian Range AONB is extended and believes that there are compelling, legitimate, justifiable and practical reasons why this extension should occur.**
- 2.2 We similarly believe that there is a degree of urgency in completing the amendment process of the current boundary as soon as is practical, to ensure that the character of the area proposed for inclusion does not change unacceptably and therefore does not affect the overall integrity of the landscape of the complete "extended AONB area".
- 2.3 We contend that the extension of the AONB can be clearly justified on the following reasons

- The quality and character of the landscape and the inherent natural beauty of the area within the proposed extension, undeniably meets the standards required of an Area of Outstanding National Landscape importance.

The status and quality of this area is clearly and objectively demonstrated through the information and evidence independently provided by the LANDMAP process, CCW's own Landscape Character map evaluation exercise and the conclusions of the various consultants studies undertaken in recent years.

- The area encompassed by the proposed extension includes national landscape resources and environmental assets which it is in the national interest to protect because of their intrinsic value and the contribution that they can make to the nation's future environmental and social well being.
- The proposed extension area in our view represents an important step towards the completion of "unfinished landscape designation business" by recognising the complete range of landscapes which should form part of the national suite of nationally important Protected Landscapes in Wales

In particular CPRW believes that the resolution of this issue in respect of the Clwydian Range represents a significant and critical step in ensuring that there is a greater degree of coherence and improved uniformity to the rationale for the strategic stewardship of the nationally important landscape resources of this part of North East Wales

- The proposed extension would be in complete conformity with the principles of the European Landscape Convention and demonstrate that CCW recognises that all landscape which are of national importance and merit special status are included within a national portfolio of Protected Landscapes.
- The proposal has the support and commitment of the three Local Authorities within whose area the proposal lies and thereby tacit support from them for the principles that AONB designation would imply both in terms of positive landscape protection and active stewardship and enhanced opportunities for improved community use and benefit.
- The proposed extension area has inherent landscape attributes and individual features which collectively contribute to the Outstanding Universal Values and thereby the Integrity of the inscribed Froncysyllte Viaduct World Heritage site. Accordingly CCW and WAG therefore have an international responsibility and duty of care to protect these assets in an effective way. Extending the area of the AONB would provide a direct means of fulfilling this obligation.
- The existing AONB has a system of management and administration which has proved to be effective in protecting the values of the landscape of this area and which can be easily extended to provide the level of custodial care which would be required to provide the proper stewardship of this extended area
- The area to be included as an extension to the existing AONB and the landscape assets within it, have the clear potential for further enhancement, if the stewardship approaches which prevail in the existing AONB are extended over the larger area. Extending the AONB would therefore not only provide opportunities to improve the character of the extension but add additional value and quality to the existing area of the AONB and hence increase its overall functionality.
- The extension has wide support from an extensive range of stakeholders who are prepared to co operate and work collaboratively to manage the area to the standards expected of a nationally important Protected Landscape.
- The extension to the existing AONB would provide a valuable and more effective means of implementing the Assembly Government and CCW's agenda for the delivery of an ecosystems approach to the stewardship of Wales landscape and the important assets they contain.

2.4 We therefore contend that the above clearly and convincingly demonstrates that the case for sanctioning the extension of the Clwydian Range AONB overwhelmingly fulfils the necessary criteria for bench marking the status of Protected Landscapes in Wales.

3. Responses to Consultation questions

3.1 With regards to the detailed questions in the consultation document, CPRW offers the following comments by way of its position

Q1. Do you think CCW's approach to designating an AONB is appropriate?

3.2 We agree that CCW has scoped all the relevant issues relating to the landscape values of extending the AONB and likewise identified all the criteria which could influence its possible designation.

As noted in our generic response, in principle the extension area is clearly one of national landscape significance and under increasing pressure from neighbouring urban centres. Designation provides an appropriate and timely means to ensure that the integrity of this landscape is safeguarded.

We also contend that elevating the status of this area will ensure that when any changes are proposed either by way of new development or land management practices, that these are properly scrutinised to a standard which will ensure that the recognised quality and landscape character of this area is not compromised.

Q2. Do you think the area proposed for extension to the Clwydian Range AONB has outstanding natural beauty?

3.3 CPRW contends that there are many places in Wales which could benefit from having the status of AONB designation. In the case of the Clwydian Range it is clear that all the landscape assessment evidence indicates that the character of the proposed extension meet the "natural beauty" standards expected of an AONB. The Upper Dee Valley and the Eglwyseg escarpment especially are in their very different ways unique landscapes that merit the highest standards of landscape protection and stewardship.

Q3. What makes the proposed extension area special for you? Are there qualities or features of the area you think are important?

3.4 The proposed area has individual qualities which are important in their own right and which collectively combine to create an area which has a strong sense of identity and quality. In particular we contend that

- The geomorphology and topography of the hills reflect the importance of the area's geology and stratigraphy and add to the striking scenic landscape character and qualities of the area

- The near and far distance vistas into, through and out of the area are exceptional and create a strong sense of place and identity for the area, which collectively complements the area within the existing AONB;
- The valleys have a range of important habitats and ecosystems for many species of flora, birds and mammals which are well connected and collectively create an important network of biodiversity resources.
- The varied nature and accessibility of the countryside in the area, offers rich opportunities for public enjoyment responsible recreational use of the area and outdoor learning. There is potential in our view for further leisure walking, cycling and horse riding given the correct forms of management;
- The historic features and cultural assets within the area making this an outstanding and national significant heritage asset. The area is not only important in its own right but makes a major contribution to the values of the nearby inscribed Ffroncsyllte World Heritage site. Its heritage values also provide significant opportunities to invigorate the benign leisure industry centred on Llangollen.
- Designation provides an important means of protecting the settlements and countryside assets of this part of N. E Wales and will ensure that any developments are appropriate in scale and nature to the character of the area.

3.5 Given the above, CPRW therefore believes that designation will provide an added stimulus to enhancing the wildlife and leisure activities and simultaneously help safeguard the economic prospects of the area for residents. Visitors will be encouraged to visit the area, knowing that it is branded as being an area recognised for the quality of its outstanding scenic beauty. This we contend this will increase the pride residents will feel in their locality and their sense of '*bro*' will grow.

3.6 More robust planning standards or at the very least, a recognition that development must be at a scale, form and location which is appropriate and maintains the landscape qualities of the area, accord fully with the objectives of CPRW. The promotion of sympathetic development will therefore be aided by designation, and CPRW looks forward to working with the Joint Advisory Committee, on which we are represented, in this respect

Q4. Are there social and economic, agriculture, tourism, development and traffic issues relevant to the proposed extension area? Do you feel there are other factors with potential to affect the landscape?

3.8 CPRW believes that a more united society will slowly result from increased awareness, better knowledge and hence greater understanding that the area is special. The aim for the future must be to encourage local people to be proud of their area, develop a sense of ownership and responsibility for their local surroundings and join in with activities which highlight, care and celebrate these qualities.

3.9 Designation in our view will help this to happen and will create the stimulus to make this happen. It will encourage the implementation of Local Authority and private activities and events, such as walks and talks and voluntary working groups, in which local residents and visitors will take part.

3.10 With a greater sense of place, will come a greater sense of purpose and opportunities to develop new forms of environmental based sustainable tourism products and services. We recognise that tourism is already a key driver and an important part of the economy in Llangollen and elsewhere and we have no doubt that the branding associated with AONB status along with appropriate marketing will increase the nett benefits that tourism can bring to the area following designation..

3.11 Although AONB status does not by definition imply a commitment to encourage recreation, outdoor leisure pursuits are becoming increasingly part of society's well being. As stated, the very fact that the proposed area is seen as being sufficiently beautiful to be protected by a national landscape designation will help the economy of the whole area. We are in no doubt that over the coming years of economic hardship; more people will choose to visit areas of "beauty" closer to their homes. This will provide an additional impetus for the economy of this area and with it, people's reconnection with their local surroundings and the pride of place we referred to previously.

3.12 With regard to agriculture, experience within the existing AONB clearly demonstrates the success which is possible in promoting environmental stewardship when AONB staff are able to work with landowners and farmers, both in determining the suitability of proposed farm buildings and alterations to field boundaries, and by way of advice about heather management and bracken control in the uplands.

3.13 We are convinced that the same will apply to the new area and that landowners will welcome the opportunity to work with staff who are able to assist them in the various challenges they face. We would anticipate that this interaction will be made more attractive for both parties given the possibility of the extra incentives which could exist within a designated landscape area for agricultural and ecological stewardship initiatives. The attractiveness of this we would anticipate will encourage farmers to embrace not only the principle but the reality of AONB designation.

3.14 With regards to development pressure, we recognise compared to many other scenic areas in Wales that the pressures on this area are not as high as elsewhere albeit that circumstances could change. We are however aware that the Local Authorities already have sound planning policies in place which not only recognise the landscape importance of this area but more importantly are geared to protecting these values.

3.15 Notwithstanding this, we believe that there is a need for continued surveillance and appropriate scrutiny and are pleased that if the extension is confirmed the standards against which development must be judged will rise and planning applications will be scrutinised more rigorously.

3.16 In these circumstances the skills and experience which has matured through the work of the current JAC will be invaluable and that this advice will be an important means of ensuring that all Planning Authorities are advised appropriately. With regard to policies for major development proposals, which would clearly be relevant to any extended area, we are delighted that large scale on shore wind turbine developments are specifically excluded from AONBs in current WAG advice contained in TAN 8.

Q5. What are your views on the proposal to designate the area as an AONB? Will designation help manage some of the issues affecting the area?

3.17 For all the reasons outlined previously, we are convinced that designation will prove to be an important means of managing the extended area of the AONB in a more sensitive, sustainable and realistic way in future. CPRW regards this proposal as one of the most important proactive landscape proposals in this part of Wales since the original designation of this area as an AONB in 1985.

Q6. What are your comments on the proposed boundary of the proposed AONB extension?

CPRW supports the position of the proposed boundary extension as indicated in the relevant mapping documents which forms an important part of this consultation.

3.18 We believe that this line represents a legitimate and defensible proposal and reflects an objective assessment and legitimate conclusion regarding the character of the area which has particular national qualities. We agree the boundary includes within it, a range of landscapes which not only complement but add value to those on the existing AONB area rather than significantly changing its character and hence its overall integrity.

3.19 The test we have applied is whether one would know the difference as to where the AONB was if the boundary was changed. Our conclusions are that one wouldn't and therefore the inclusion of the proposed area is sound.

3.20 Notwithstanding that, we believe that the boundary to the south west seems a little contrived and would be better if it was drawn further to the south. However, we do recognise that the area to the south of the A5, (with its mostly north facing slopes) integrates with the Llantysilio hills rather than the continuing Berwyn hills to the south west.

3.21 We agree with the principle that the settlement of Llangollen should be included in the AONB, as we believe this recognises and provides positive incentives to improve the amenity and quality of development in the town which already has an appealing atmosphere and high tourist profile. Inclusion of Llangollen in the AONB we believe will provide the stimulus for greater investment in improving the built environment of the town still further by raising the overall standards of development. We also trust that the converse will occur that its inclusion in the AONB will avoid inappropriate developments in the town that would detract from its unique character.

3.22 We are especially pleased that Esclusham Mountain has been included. This will provide positive opportunities and an incentive for residents of Brymbo and the villages to the west of Wrexham to take a direct interest and pride in their local surroundings. Extending the boundary of the AONB closer to the urban fringes will we believe increase the credibility of this area of countryside as a resource and thereby make it more directly accessible to the residents of nearby towns. We believe that this principle is particularly important in helping everyone to understand as the European Landscape Convention clearly states that "All landscapes matter"

3.23 Notwithstanding the fact as stated above that CPRW supports the boundary extension of the AONB as currently proposed, we suggest that further detailed work should be undertaken to evaluate whether the Ceiriog Valley should have the same protective status as that proposed for the remainder of the extended AONB. This work should not however compromise the timetable for ratifying CCW's currently preferred option for the AONB boundary extension.

3.24 In recognising that the Ceiriog Valley clearly is of a landscape quality equal to that of the neighbouring Clwydian Range AONB and deserves an equivalent form of protection, we also appreciate that this area does not easily form a logical geographical extension to the enlarged Clwydian Range AONB as currently proposed. We therefore trust that CCW will consider how this dilemma can be reconciled at the earliest possible opportunity.

3.25 CPRW trusts that our conclusions and recommendations therefore provide a clear and helpful point of reference and that the Countryside Council for Wales will make a conclusive and unequivocal recommendation that the Clwydian Range AONB should be extended to include all the areas we propose.

3.26 We would be grateful to be kept informed of the outcomes of this consultation and of the recommendations which will be forwarded to the Minister for her consideration.

We await your response in anticipation

Yours faithfully

A handwritten signature in black ink, appearing to read 'Peter Ogden', with a long horizontal flourish extending to the right.

Peter Ogden
Director
CPRW

January 27th 2011

This response is also endorsed by the Clwyd and Wrexham Branches of CPRW.