

**NATIONAL ASSEMBLY FOR WALES'
ENVIRONMENT & SUSTAINABILITY COMMITTEE**

INQUIRY INTO MARINE POLICY IN WALES

Evidence of the Wales Landscape Partnership

1. The Wales Landscape Partnership [WLP] welcomes the opportunity to present evidence to the above Inquiry, especially as the marine planning process has yet to commence and there are significant questions yet to be answered in terms of what the plan will actually look like and the process that will be followed in preparing it.
2. WLP is a loose Alliance of organisations and individuals with a deep concern for the future well being and sensitive stewardship of Wales's diverse range of landscapes and seascapes. It exists to promote and provide informed advice about the special relevance and benefits that sensibly managed landscapes and seascapes provide and the opportunities they offer to enhance the quality of life of Welsh people and their associated well being.
3. The Partnership's interest in the development and implementation of marine policy in Wales lies in the way in which the long-term conservation and enjoyment of our coastal landscapes and seascapes are addressed in marine plans. In particular we are concerned about the opportunities by which the Welsh Government's new and ambitious legislative programme will enable the land and sea surrounding Wales to be planned and managed in a more integrated and effective way.
4. Our evidence addresses the particular interests described above and focuses on two of the questions set out in the letter of 13 August 2012 requesting submissions of evidence. The questions are:
 - What progress has been made in relation to the development of marine spatial plans for Wales?
 - Whether the Welsh Government has sufficient financial and staff resources to deliver on its marine policy and legislation objectives?

Summary

5. In summary the Wales Landscape Partnership through its evidence wishes to draw the attention of the Committee to
 - the importance to Wales of its seascapes and coastal landscapes;

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- the need for their planning and management to be fully addressed in the forthcoming marine planning process; and
- the need for land and sea to be planned as a continuum

Whilst welcoming the Minister's recognition that seascapes and coastal landscapes should be considered during the process, WLP is concerned that the extent of the preparatory work needed to enable that proper consideration is not fully appreciated, in particular the need for:

- a common understanding of what seascapes are
- a comprehensive seascape character assessment to be undertaken
- nationally important seascapes to be identified and designated
- a management framework to be created for nationally important seascapes
- the marine component of coastal protected landscapes to be formally recognised as part of the network of nationally important seascapes identified and the management framework created for them.

It is concerned as to whether or not the WG and/or the new NRB will make the necessary resources available to enable full consideration to be given to seascapes and coastal landscapes in the marine plan process

General comments

6. The Partnership is disappointed at the overall lack of progress in relation to marine planning following the consultation in April 2011. The absence of any response is perplexing. As shown in the more general points in paragraph 6 below and in the main part of our evidence a lot of preparatory work is needed which will require time and money to undertake. If the latest target date for completing the first plan in 2014/15 is to be achieved, this work will have to be initiated very soon.
7. Before setting out the main thrust of our evidence there are a number of general points that we believe Committee members need to be aware of and take into account during their deliberations:
 - a) In responding to recent consultations on the Environment Green paper and the proposed nature and scope of the new Natural Resources Body for Wales (NRB), WLP has felt it necessary to comment that that neither document recognised nor made it clear that
 - Natural resource management in Wales must view and involve both landscapes and seascapes as a continuum
 - The new NRB's role and remit must embrace the marine environment and its coastal interface realistically.

Given that 50% of Welsh territory is made up of the sea, this lack of clarity does not bode well for either the promotion of a creative ambition for or an integrated approach to the planning and management of land and sea.

Further it is by no means clear as to the precise relationship between the Marine plan[s] and the proposed National Resource Management plan which appears to be a central feature of the Welsh Government's proposed Living Wales agenda. As a result significant uncertainty exists as to the status of the Marine Plan and whether it will eventually form part of the proposed National Resource Management Plan or be completely independent of it but subject to its aims and objectives.

We believe at the very least this Inquiry and the Committee's subsequent recommendations should ensure that the Welsh Government clarify this relationship.

- b) Wales has signed up to the European Landscape Convention, which covers its land area and its sea as far as the territorial limit. Despite this we are very concerned that discussions on marine planning thus far have not paid heed to the Convention. We draw Members' attention to this fact and advocate that the principles set out in the Convention should provide an important starting point for the consideration of the importance of the concept of "seascapes" in the forthcoming marine plan process.
- c) As the form of the plan is not yet known once more two significant issues arise namely:
 - Will the Plan be spatial or policy based like the Marine Policy Statement?
 - Will there be more detailed plans for areas where there are many complex issues?

Our considered opinion is that the a **Spatial approach** is essential if a proper framework is to be provided for planning and management of the marine environment, especially in certain more complex local areas – see paragraph 10 c and e below.

- d) With regards to the relationship between the Marine Plan and the current ICZM strategy for Wales, we note the latter was published in 2007 and was due for review in 2010. We draw Member's attention to the fact that no review has yet taken place. Whilst the Welsh Government has rightly stated that the marine plan process should help integration between land and sea, there are many policies and actions in the ICZM strategy which could help achieve integration and also help the marine plan process. **We consider that an urgent review of the strategy should be undertaken, taking into account the passing of the Marine Act.**
- e) In the context of ICZM and stakeholder engagement in the marine planning process we are aware of the valuable role that coastal partnerships could play in the future, providing a neutral forum bringing people together to discuss issues and exchange information. We are aware of the evidence being submitted by the Wales Coast and Maritime Partnership, the Pembrokeshire Coastal Forum and the Severn Estuary Partnership and commend it to the Committee.

Seascapes and Coastal Landscapes

8. The evidence for need for the above actions and the main part of our evidence below is drawn from the principles underpinning and the content of the “*Manifesto for Coasts and Seascapes*” published¹ in 2011, which individuals in WLP assisted in drafting. The content of this Manifesto was based upon the work of the Coastal and Marine Working Group of Europarc Atlantic Isles, in particular the report of a workshop on coastal protected landscapes and the marine planning system held in May 2010. It also draws upon the outcomes of recent discussions with professionals with a particular interest in seascapes and landscapes.
9. The Manifesto was drawn up in anticipation of the arrival of marine planning to highlight the importance of our seascapes and coastal landscapes throughout UK. We contend that the seascapes and coastal landscapes are:
 - amongst the finest in the world – witness National Geographic’ poll placing the Pembrokeshire Coast amongst the top 10 destinations in the world
 - regarded as an integral part of our national heritage – extensive lengths of the Welsh Coast are designated as either National Parks , AONBs or defined as Heritage Coast, whilst large areas of waters adjacent to the Welsh coast are designated as European Marine Sites for their wildlife and nature conservation values – most of these being adjacent to coastal protected landscapes as illustrated on the Map in Annex 2
 - contributing significantly to public health and well-being and are major resources for a wide range of recreation – a survey by the National Trust in 2010 revealed that 63% of respondents regarded a visit to the coast as being important to the quality of life and 40 % felt that the coast matters for peace and freedom
 - Long standing destinations for tourism and recreation activities which in many parts of Wales are the major drivers and contributors to national and local economies – the ‘Valuing the Environment Report [2006] indicated that the coastal and marine environment in Wales supports 52,000 jobs and generates £4.8 billion income
10. Given their undoubted environmental, economic and social importance it is not surprising, therefore, that we believe greater attention and prominence should be placed on the inherent and potential value of Wales’s coastal areas and seascapes in the forthcoming Marine planning process. The key messages in the manifesto reflect this fact and highlight that:
 - seascapes [including coastal landscapes] must be treated as a key national resource in the marine planning process

¹ Published by a Group of NGOs – Campaign for National Parks, Campaign for the Protection of Rural Wales, National Trust, National Association for AONBs and the Campaign for the Protection of Rural England. The text of this Manifesto is set out in Annex 1 to this submission.

- seascape character assessment must provide the basis for understanding the nature of our seascapes
- a robust and practical basis for recognising and conserving nationally important seascapes must be developed; and
- coastal protected landscapes [AONBs and National Parks] must be seen as nationally important parts of seascapes and given the mandate to address marine issues and to show how they can be an important agent for managing seascapes and coastal landscapes in an integrated way

11. Since its publication WLP has been encouraged by references to the importance of ‘seascapes’ in the Marine Policy Statement and the WG consultation on marine planning in 2011. Further, in his response to the Manifesto, John Griffiths, the Minister for Environment and Sustainable Development said that

“I can assure you that seascapes and coastal landscapes will be one of several important features and activities that will be taken into account within the process of creating Welsh marine plans.”

12. However, concerns remain that they may not be considered in as full a way that their importance deserves as there is a considerable amount of preparatory work to be done before the process starts. Our concerns are therefore as follows

a) **Seascapes have not been properly defined nor their relevance fully acknowledged**

At its most basic we believe there is the lack of a common understanding of what a ‘seascape’ is. The Oxford Dictionary gives the following definition – “*a picturesque view or prospect of the sea*”. Whilst we agree that the view is an important component of a ‘seascape’, we believe that there is more to a ‘seascape’ than just the view.

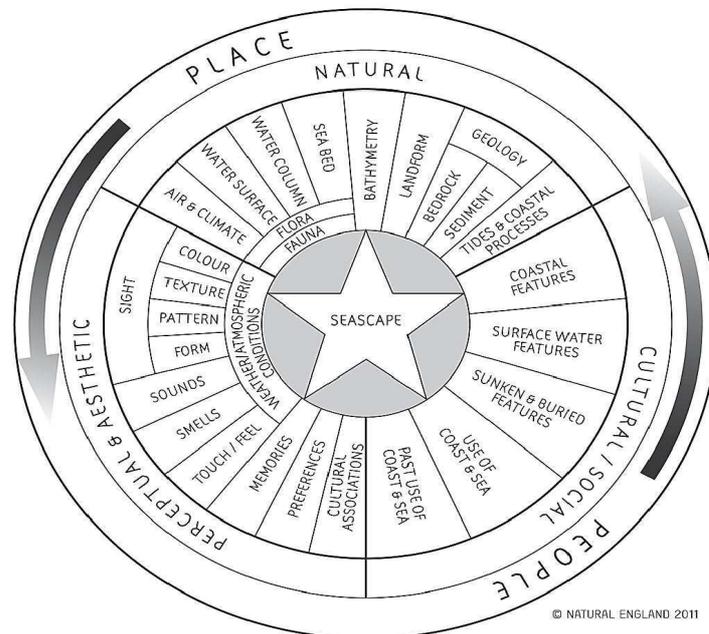
The promoters of the ‘Manifesto’ adapted the definition of landscape found in the European Landscape Convention [ELC] as follows: “*an area of sea, coastline and land, as perceived by people, whose character results from actions of land and sea by people and/or human factors.*”

Accordingly the result is a definition that embraces **not just a view but the notion and importance of place, the connection between land and sea, and the interaction between people and the natural world.** Further insight into what a seascape is can be gained from the IUCN definition of protected landscapes and seascapes – “*an area of land, with coasts and seas as appropriate, where the interaction of people and nature over time has produced an area of distinct character with significant aesthetic, ecological and/or cultural value and often with high biological diversity.*”

The various characteristics and dimensions of what we describe as Seascapes we suggest is diagrammatically captured and well illustrated in the “wheel” below. As is clear Seascapes reflect an emphasis on and bringing together of people and place and

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the relationships between the natural, cultural/social and perceptual/aesthetic values of any particular location. The various components highlighted in this wheel underpin the techniques for seascape character assessment currently being developed by the Countryside Council for Wales (CCW).



We believe that this expression of what a ‘seascape’ is and represents should underpin and provide the guiding framework around which the marine plan process in Wales is based.

b) Marine Planning should be based on the principle of establishing a continuum between the land and the sea -

Closely associated with our concern about the need for a proper understanding of the importance of ‘seascapes’ as a guiding concept is the associated and continuing lack of appreciation of the importance of treating coastal landscapes and their adjacent areas of sea together as one continuum. This is clearly the result of the distinction made between land and sea in administrative terms.

As Committee members will be fully aware the domain of land use planning stops at the mean low water mark. In landscape/ seascape terms and in reality this distinction is however totally artificial. This is particularly well illustrated by Wales’ coastal protected landscapes, whose extent is illustrated on the map at Annex 2. These special areas derive many of their special qualities from the marine environment and their direct associations with it. Yet the limits and jurisdictions of these designated areas go no further than the mean low water mark and the remit of those responsible for their planning and management does not embrace the adjacent marine environment. Accordingly their management plans do not and have never in the past addressed the marine environment

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and the issues in these areas which have direct implications on the special qualities of these areas. Thus, for example, in Pembrokeshire, the national park [UK's only truly coastal park] does not cover the marine environment, from which it derives many of its special qualities.

We therefore contend that for the planning and management of Wales' environment to be undertaken in a coordinated and effective manner, seascapes and coastal landscapes must be addressed as one in the marine plan process.

c) **The need for a robust process to assess the character of Seascapes**

Notwithstanding the excellent work that has been undertaken by CCW in recent years there is as yet still no comprehensive nor logical assessment of the character and distinctiveness of the seascapes and coastal landscapes of Wales.

We believe that the spatial framework within which the Marine plan is to be developed cannot be successfully achieved unless a realistic and comprehensive assessment of the character and significance of all the Welsh marine area is undertaken.

The very important work that CCW has initiated we therefore commend to the Committee and trust that it will recommend that this should be carried to its conclusion by the incoming Natural Resource Body.

d) **Nationally important seascapes should be identified and designated** -

Currently whilst there are established means of identifying and designating areas of importance for nature conservation, there is no corresponding nor established approach for defining the significance / sensitivity of the character of seascapes or for identifying / designating those which are of national importance.

We recommend therefore that such an approach should be developed and be integrated into the marine plan process.

In this context we also believe that consideration should be given to the extension of coastal protected landscapes to embrace the area of sea from which they derive their special qualities and with which they have particular associations. The proposal by the Friends of the Pembrokeshire National Park to extend the Park out into the marine environment provides a good illustration of how this might work – See Annex 3 for an outline of the proposal.

e) **The future management of nationally important seascapes**

If the principle of designating nationally important seascapes is accepted and embedded in the Marine planning process, it is clear that these areas will need

- A spatial framework to ensure their effective co ordination and management including the requirement for the preparation of management plans [they should be regarded as more detailed insets of the marine plan]
- The necessary duties, powers and resources to implement such a Management Plan.
- The identification of an existing organisation or creation of a new one to hold these duties will be crucial.

Again, the Friends of the Pembrokeshire National Park proposal illustrates how this might work – see Annex 3.

In the meantime we contend that progress could be made by creating the necessary policy climate within which coastal Protected Landscapes are given the mandate from the Welsh Government to ensure that they:

- address what special qualities they derive from, and their relationship with, the marine environment, based on detailed seascape assessment in their management plans
- draw marine interests into their partnerships and work with marine stakeholders
- promote the integrated management of land and sea, for example through local fora and joint management of adjacent European Marine Sites & MCZs as well as through the marine plan process.

We recommend that the forthcoming review of the National Park and AONB Policy statement addresses these points

Resources

13. Finally, the Wales Landscape Partnership would like to record its concern that there appears to be serious lack of resources in terms of both staff and money within the Welsh Government to develop the marine plan for Wales, especially if the plan is to have a spatial dimension.
14. Further, it is not yet clear whether either the Welsh Government or the new NRB will redress this situation and make the necessary resources available to take forward our proposals and hence complete the vital development and implementation of seascape character assessments, to identify Wales' nationally important seascapes and to develop a framework for their management, assuming that this work is within its remit.

Conclusion

15. In conclusion, WLP hopes that this submission not only highlights but emphasises in the Committee's mind the importance of addressing the conservation of Wales' seascapes and

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coastal landscapes during the marine plan process. Only by doing so will their role and long term future relevance to the economy and well being of the Welsh public be secured.

16. As one of Wales' greatest assets, we are firmly of the belief that there is an urgent need to undertake significant work to make sure that our seascapes are fully understood and that the means of conserving their special qualities are put in place without further delay...
17. We trust that the Committee is of the same view as us and we would be happy to discuss and elaborate on any of these points in person with the Committee during its forthcoming period of scrutiny.

Wales Landscape Partnership

September 2012

A manifesto for coasts and seascapes

Promoted by:

Campaign to Protect Rural England, Campaign for the Protection of Rural Wales, Campaign for National Parks, Europarc Atlantic Isles, National Association for AONBs and the National Trust

The background

The coastal landscapes and seascapes of the UK are some of the most varied and interesting in the world. They hold a strong sway in the popular imagination of our seafaring nation and are a key component of our national heritage. Some seascapes are of note for their outstanding natural features, others for their culture and history, but more often it is a mix of the two. They are more than just a view.

People care strongly about our coasts and seascapes. Access to them is important to our health and well-being and they make a fundamental contribution to the economy and culture of our coastal communities. The character and qualities of coastal landscapes and seascapes need to be positively managed if they are to be maintained for the benefit of current and future generations.

The national importance of coastal land is recognised through the designation of protected landscapes. They derive many of their special qualities from their association with the marine environment. However, there is no means of recognising through designation the national importance of this association in spatial terms*, nor of recognising the national importance of particular seascapes.

Our coastal landscapes and seascapes are under considerable pressure from both human activities e.g. conventional and renewable energy, port development, recreation and tourism, and from changes in the natural world associated with sea level rise leading to increased coastal flooding and erosion.

The introduction of the new UK marine planning system provides a unique opportunity to address the future of our seascapes and coastal protected landscapes in an integrated fashion – enabling full recognition to be given to the importance of treating land and sea as a continuum.

Protected landscapes are in a good position to optimise the links between the land and sea as a result of the integrative approach to their management plans and the way in which they bring stakeholders together in partnership as a matter of course.

** The National Parks (Scotland) Act 2000 enables combined coastal and marine national parks to be designated*

The manifesto

The organisations promoting this manifesto call on the UK Government, the devolved administrations, marine planning authorities, national agencies and coastal local authorities to ensure that their policies for delivering a sustainable future for the coastal and marine environment embrace coasts and seascapes and the role that protected landscapes and seascapes can play in this process. To do so, they should recognise:

The importance of coastal landscapes and seascapes

1. by adopting the following definition of a seascape derived from the European Landscape Convention definition of landscape:

‘an area, as perceived by people, of sea, coastline and land whose character results from actions and interactions of land with sea by natural and/or human factors’

2. by promoting seascapes as a key resource in the marine environment and as a framework to underpin a sustainable approach to its planning and management

3. by identifying the character and distinctiveness of coasts and seascapes and the means by which they should be conserved through the marine planning process

4. by developing and deploying the established principles of landscape characterisation and sensitivity analysis in the marine environment as an essential building block of marine planning

5. by identifying areas of seascape which, by virtue of their outstanding aesthetic, ecological and/or cultural qualities, are of national importance and the means by which they should be conserved through the marine planning process.

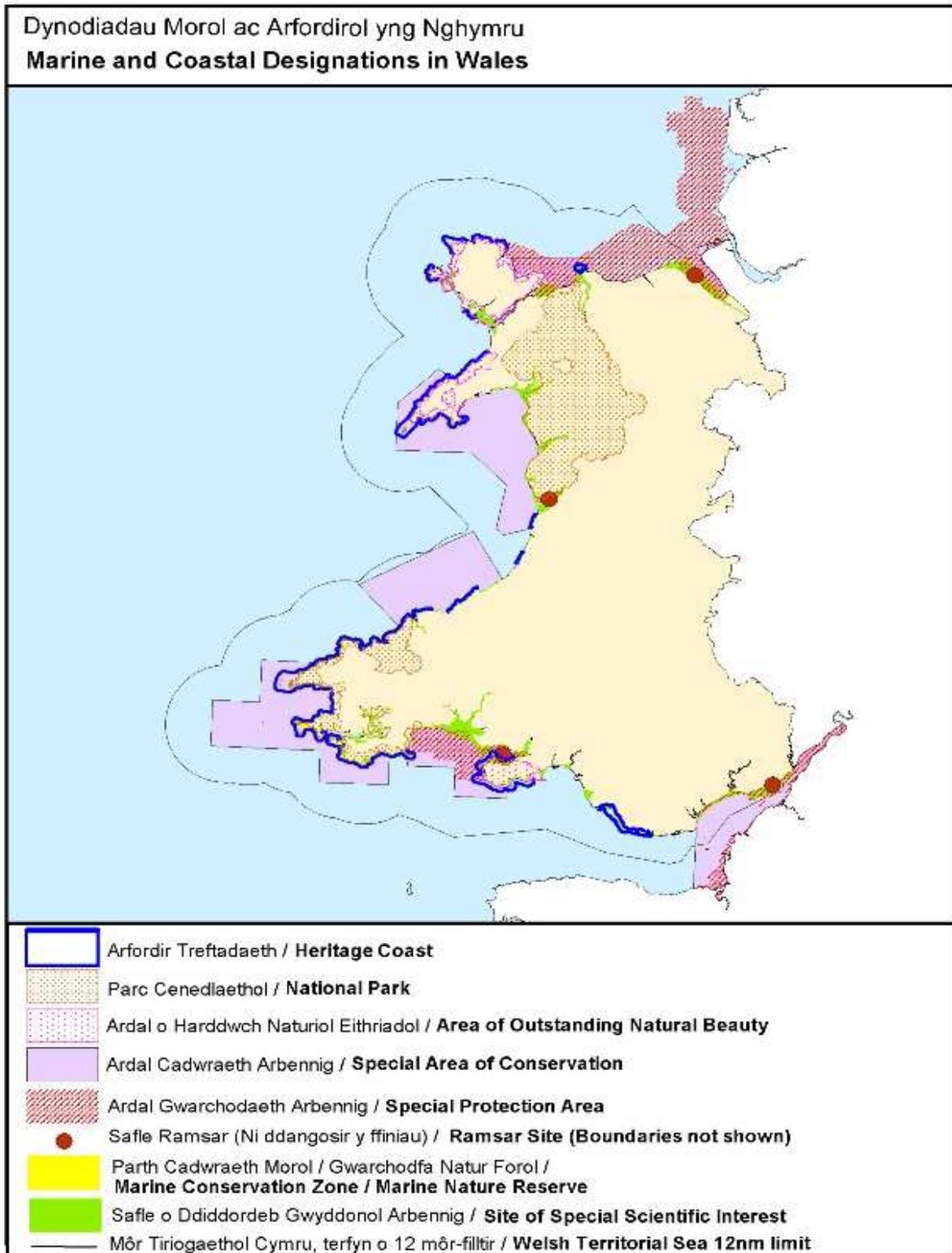
Furthermore, the Government, agencies and authorities should also recognise that:

Coastal protected landscapes are a key tool for managing coasts and seascapes

6. by promoting them as a nationally important component of the seascape

7. by ensuring that the protection and enjoyment of their special qualities, as set out in their management plans, are a key consideration in any marine plan or partnership embracing the coast or surrounding sea

8. by enhancing the role that coastal protected landscapes play in integrating land and sea through the extension of the scope of their management plans and partnerships and the development of joint approaches to management with stakeholders who have interests in adjacent marine protected areas.

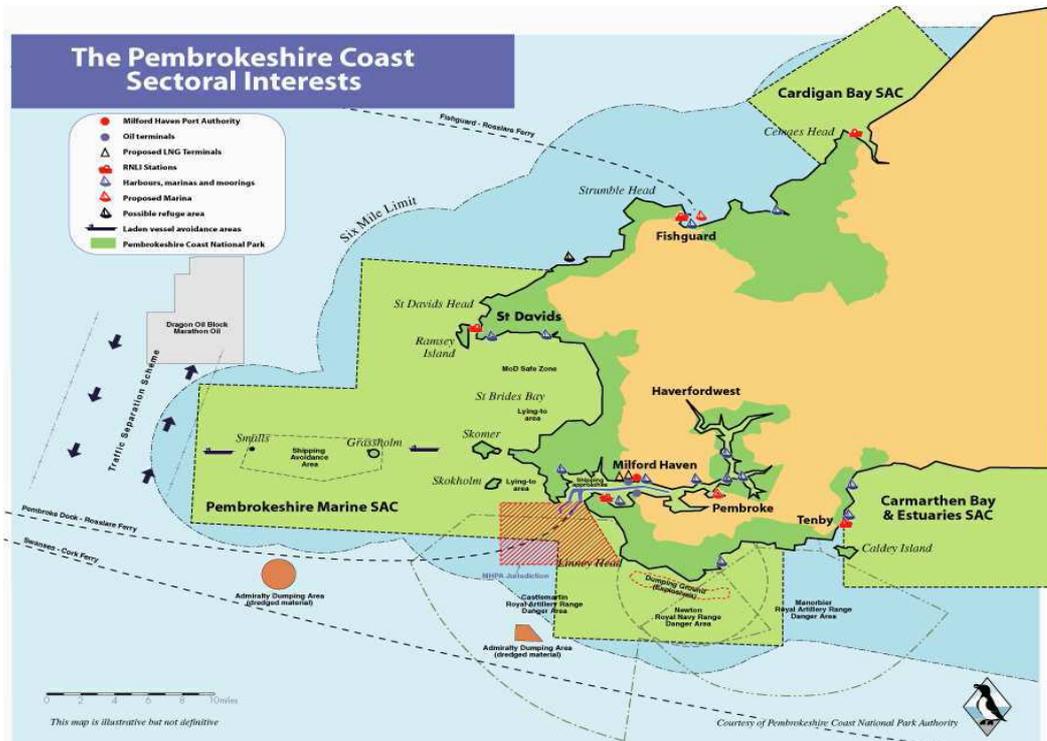


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PROPOSAL BY THE FRIENDS OF THE PEMBROKESHIRE COAST NATIONAL PARK FOR THE EXTENSION OF THE PARK INTO THE MARINE ENVIRONMENT

In response to the need to integrate many marine activities with the internationally important environment around the coast of Pembrokeshire and, in particular, to concerns about the impact of water-based recreation on the special qualities of the National Park and the lack of any one organisation with the duty and powers to manage these impacts, the Friends of the Pembrokeshire National Park have proposed to the Minister that:

- The Park should be extended seawards to embrace the SACs adjacent to it i.e. approximately to the six mile limit shown on the map below
- The statutory management plan for the Park should include the marine area, providing the framework for those who have particular responsibilities for example, for fishing, wildlife conservation, military firing, shipping and the licensing would operate, as well as for the management of recreation activity. Its preparation should, as now, be led by the National Park Authority.
- The National Park Authority should be given the duty and necessary powers to manage water based recreation. This would be consistent with the purposes of the National Park and would enable a proactive approach to be taken to integrating recreation with a very sensitive environment.



In putting them forward the Friends stress that the proposals:

a) are about:-

- Securing proper recognition of the importance of the Pembrokeshire Coast National Park which depends upon the special qualities of the marine environment that surrounds it
- Providing an appropriate integrated planning and management framework covering both the hinterland of the National Park and the waters adjoining it for all the activities that are likely to take place within it
- Providing for a single agency to manage land and water based recreation
- Providing the most efficient and least costly mechanism to conserve, protect and enhance the environment of both these special areas for all to enjoy
- Providing the Welsh Government with a 'flagship' opportunity to demonstrate that it is utilising its new powers to the best possible effect to protect and enhance the unique environment and heritage of both these areas for generations to come

b) are not about:-

- Interfering with the management of fisheries except possibly in extreme cases where a particularly sensitive area of environment or species is under threat
- Encroaching upon the authority of the Milford Haven Port Authority or the control of shipping in and out of the Haven
- Suggesting any changes to the licensing of development within the marine environment

c) are entirely consistent with the guiding principles that lay behind the formulation of the Manifesto for Coasts and Seascapes.