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**A Sustainable Wales Better Choices for a Better Future - Consultation on proposals for a Sustainable Development Bill**

The National Association for Areas of Outstanding Natural Beauty (NAAONB) is a voluntary body whose membership includes all but one of the AONB Partnerships in England and Wales, as well as many of the local authorities with statutory responsibility for AONBs, the Trust which manage AONBs in Northern Ireland, as well as a number of voluntary bodies and individuals with an interest in the future of these iconic landscapes.

The work programme and governance structure of the NAAONB fully reflects the devolved nature of government in Wales and works closely with the Areas of Outstanding Natural Beauty (AONB) partnerships of Wales to ensure that they remain well placed to deliver their purpose and statutory duties set out under Sections 85 and 89 of the Countryside and Rights of Way Act 2000.

The NAAONB regards this proposed bill as the foundation for any approach to natural resource management in Wales. Likewise, we consider that this bill will set the direction for any public body vested with stewardship of the natural environment. Our response aims to highlight the value that AONB partnerships can bring to furthering sustainable development thinking, and the role that the AONB designation, and the landscapes to which they relate, can play in helping achieve a more sustainable Wales.

Yours sincerely

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## **1.0 The context**

- 1.1 The NAAONB once again welcomes the opportunity to comment on this emerging bill. The NAAONB will not repeat statements and opinions set out in our response to the Welsh Government consultation on proposals for a Sustainable Development Bill, but where we feel it is necessary we will reiterate the fundamental relationship between sustainable development, the landscape approach, and the contribution that AONB partnerships can make towards achieving Welsh Government aims and objectives within the context of the proposals set out in this consultation. The National Association for AONBs welcomes and supports the commitment made to enshrining sustainable development as the central organising principle, not just of the Welsh Government, but of the wider public service in Wales. We also welcome the obvious consideration given to responses to the initial consultation.
- 1.2 Areas of Outstanding Natural Beauty (AONBs) are distinctive landscapes of outstanding quality and value. The landscapes themselves are strategic national assets, and the partnerships that govern the AONB designation are in a prime position to advance sustainable development for the people of Wales in line with the spirit of this bill.

## **2.0 Landscape and Sustainable Development**

- 2.1 AONB partnerships, along with the National Parks Authorities, have a fundamental role to play in testing and achieving a more sustainable way of living, in particular through their functions in relation to delivering ecosystem services across the three threads of sustainable development: social, economic, and environmental
- 2.2 The full scope of social justice issues obviously extend beyond the interests of AONB partnerships, but the issue of environmental justice particularly helping to define the structure of the relationship between which services or environmental goods are distributed, to whom and the principles of this distribution is central to progressive AONB management planning. The AONB designation acts as a framework for systematic, co-operative planning, and actively supports social well-being in ways consistent with the AONB purpose.
- 2.3 The NAAONB supports the principles of embodying values of fairness and social justice in public service delivery, and promoting social justice and equality of opportunity, but asserts that this is not fully achievable without concomitant changes to economic policy and the development of levers that sit outside an SD bill and extend beyond public bodies. Accepting that sustainable development is about inter and intra generational equity the NAAONB is unclear as to how the Welsh Government plan to manage the inherent contradiction between ensuring adequate resources are available for future generations and maintaining fair and equitable access to resources

now, in a free-market place where the value of those resources will rise as a result of policies designed to promote a sustainable future.

- 2.4 Accepting the difficulty outlined above, the NAAONB believes with conviction that the ability of an SD act, and associated SD Body, in furthering sustainable development in Wales is a reality, and supports the Welsh Government's actions to make this happen.
- 2.5 Consistent with our response to Sustaining a Living Wales, the NAAONB asserts that managing the environment parallel to a system that allows the economy to be driven by market forces will not work. Adopting an ecosystem approach is more than managing the environment as an integrated system; it involves managing societal and economic drivers as part of this system. This is fundamental, in our view, to achieving sustainable development and is a key principle behind the landscape approach. AONB partnerships, in their delivery of the AONB purpose, have an exceptionally important role to play in ensuring this bill results in a more sustainable Wales. AONB management plans are an obvious vehicle for articulating how this can happen and engaging people in making it actually happen.

### **3.0 The SD duty**

- 3.1 The NAAONB supports the principle of a sustainable development duty being placed on those public sector organisations that have the greatest impact on the economic, social and environmental wellbeing of Wales.
- 3.2 The NAAONB is particularly supportive of the importance attributed to collaboration to achieve shared outcomes, but is mindful of the investment required to develop systems and processes and embed behaviours that enable effective collaboration, and the significant resource implications of making it happen. The NAAONB is particularly keen to work with the WLGA on this, reflecting the close relationship between AONB partnerships and local authorities.
- 3.3 The NAAONB is currently unclear how will the SD duty will affect the work of AONB partnerships as some members will be impacted by the duty, whilst others will not. It is extremely important, therefore, that any emerging protected landscape policy statement gives clear direction to the work of AONB partnerships in relation to the aspirations of this bill.
- 3.4 Likewise, it is essential that any guidance on AONB management planning reflects the need to join up thinking across the Welsh Government, Natural Resources Wales, Local Authorities and AONB partnerships to deliver on this emerging bill to best effect.

### **4.0 The SD body**

- 4.1 The NAAONB supports the proposal to establish an independent Sustainable Development Body. The NAAONB is pleased to see that the roles of this

proposed body include the provision of specific support to other organisations.

- 4.2 Whilst the NAAONB supports all of the proposals for the new body, as set out in the consultation document, we feel that there could be greater emphasis placed on embedding community and network collaboration as a route to achieving a more sustainable Wales.
- 4.3 It is clear that there is no longer a question over whether we should be working towards sustainability, but rather how leaders should face the challenge of making this happen. The SD body must be capable of consensus building across sectors and different organisational cultures to develop joint initiatives that demonstrate how to make it happen. To do this will require exemplary leadership.
- 4.4 The NAAONB welcomes the proposal that there should be a Commissioner to lead the new Body. It is essential that this figurehead is appointed with the above in mind. Additionally, there needs to be an acknowledgement that together we need to reach a balance between collective action and collective learning as a foundation of innovation.
- 4.5 The new Body needs to have the capacity to lead structural change, and develop Wales's capacity for collective leadership.
- 4.6 Appropriate funding must be provided if the Body is to be effective, as is the need to create tangible results and enhance collective responsibility for change.
- 4.7 The NAAONB believes strongly that an approach to procurement must be included within the Bill. AONB partnerships work extremely hard to foster local, sustainable, economic development and the purchasing power of the public sector has a potentially significant role to play in developing a more sustainable rural Welsh economy.

## **5.0 Final Comments**

- 5.1 The NAAONB is delighted to see the role that the Welsh Government is playing in developing the sustainable development agenda, and the courage with which it intends to act. We accept that significant changes will need to be made across Wales, both in relation to operational issues and governance structures, in order for the Welsh Government's aspirations to become a reality.
- 5.2 The NAAONB supports the notion that a healthy, functioning environment underpins the wealth, health and wellbeing of the nation, and consequent to this, recognises the important role Natural Resources Wales will play in ensuring and Sustainable Development Act effects positive change.
- 5.3 Likewise, any emerging Environment and Planning Bills must work to strengthen SD principles. There must be clear integration between the three resultant acts.

- 5.4 The NAAONB asserts that sustainable development is at the heart of decision making within AONBs, recognising the vital role that AONB management plays in relation to the management of our natural capital, ecosystem service delivery, and environmental justice, itself an important component of social justice. Since 2001 the Sustainable Development Fund has allowed AONB partnerships to explore ways of implementing the principles of sustainability, remove obstacles to sustainable development, and develop models for the sustainable management of the countryside that could be applied more widely in Wales. Additionally, AONB partnerships have, through this fund, been successful at generating greater awareness and understanding of sustainability. The investment of the Welsh Government in developing this body of work has resulted in a valuable resource that can help improve the quality of our approach to sustainable development in Wales.
- 5.5 AONB partnerships, and the NAAONB, would be happy to continue to work with the Welsh Government in furthering the principles of sustainable development in Wales.

NAAONB  
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