

(Draft) CNP Cymru response to the consultation on Natural Resources Wales draft Corporate Plan

Introduction

The Campaign for National Parks has been in existence for over 75 years and is the charity that campaigns to protect and promote National Parks in Wales and England as beautiful and inspirational places enjoyed and valued by all. CNP Cymru represents the interests of third sector bodies such as the three National Park Societies in Wales and other bodies such as CPRW (Campaign for the Protection of Rural Wales), Ramblers Wales and the National Association for AONBs (Areas of Outstanding Natural Beauty). The three National Park Authorities in Wales and National Parks Wales have observer status.

National Parks are our finest landscapes with the highest level of protection. Their statutory purposes are to conserve and enhance wildlife, cultural heritage and natural beauty, and to promote opportunities for public enjoyment and understanding of their special qualities. CNP Cymru believes that National Parks should be maintained as distinctive and unique tracts of countryside, which are also adaptable and resilient to future pressures such as climate change.

National Parks contribute significantly to the well-being of the nation, by providing safe, attractive, healthy places for recreation. They also play a vital role in sustainable development through protection of the landscape, wildlife and key environmental resources and services, like water provision and carbon storage in peat soils and forests, which can mitigate the effects of climate change. As well as being inspiring places for people to enjoy and improve their health and well-being, National Parks make a significant contribution to the economy through tourism, farming, and other related businesses.

We welcome this opportunity to contribute to the development of Natural Resource Wales' first Corporate Plan as we believe that this document will be crucial in setting the right direction for the new organisation. We have two main concerns about the document:

- Insufficient attention is paid to landscapes and seascapes. The coverage of protected landscapes is very limited and in some cases key aspects of NRW's responsibilities with regard to these have been omitted. We are particularly concerned at the reference to NRW as a designating authority at the bottom of page 6, which refers to the organisation's responsibilities with regard to SSSIs and AONBS but does not mention National Parks. This should be corrected in the final plan. We are also concerned at the lack of reference to the European Landscape Convention. Even less attention is paid to seascapes and the only mention of these is in the foreword where their contribution to the Welsh environment is acknowledged. However, there is nothing in the body of the document to indicate what NRW will do to support seascapes.
- Although we are aware of expressions at senior level in NRW of the need to work closely with the third sector in order to achieve its objectives, there is insufficient detail in the draft Plan on how NRW proposes to work in partnership with the third sector and a lack of clarity as to what its relationship with them will be. Whilst the document includes a number of statements intended to show NRW's desire to work in partnership with other organisations, for example, NRW's role as a 'key collaborator with the public, private and voluntary sectors delivering projects for the benefit of Wales' is listed as one of the roles and responsibilities, we would like to see more detail on how

NRW will do this in practice. This is particularly important given the benefits of working with third sector organisations. Unfortunately the recent experience of CNP Cymru members suggests that some of the practical support that the predecessor organisations provided to the third sector will no longer be available. For example, Cymdeithas Eryri the Snowdonia Society reports that the funding they have received for several years to support the work of 400 volunteers as part of the Snowdonia Ecosystem Project will no longer be available from next year. The resource constraints facing NRW are fully appreciated but the third sector cannot deliver projects like this without any funding support.

Response to consultation questions

Who we are and what we do

1. Are our purpose, roles, shared outcomes and finances clear and understandable?

Yes, for the most part although we are very concerned that protected landscapes, and landscapes generally, do not currently appear to feature very much at all in NRW's plans. Given the responsibilities for protected landscapes that NRW has inherited from the Countryside Council for Wales, they should be acting as the champion of protected landscapes in Wales but there is no indication of this in the draft Corporate Plan. In particular, there is a lack of clarity about NRW's role as a designating authority for National Parks as this aspect has been omitted from the list of roles and responsibilities, nor is there any reference to NRW's role in monitoring, and reporting on, the Section 62 duty to have regard to National Park purposes. NRW's responsibilities for reviewing the boundaries of protected landscapes and promoting the sustainable management of these areas are also missing.

We value highly the existing funding we receive for our collective work with third sector organisations through CNP Cymru and are keen to see the availability of such funding continue. We would like the Corporate Plan to include greater clarity about NRW's role in supporting the third sector and about the importance of actively engaging with all sectors of Welsh society including communities, voluntary organisations, community and local councils, public bodies, private sector businesses and regulatory bodies. There are many benefits for NRW of working with the third sector but these will only be delivered if NRW does this in a way which provides consistent and stable support which is appropriate to the needs of small third sector organisations. We have provided further details of what this would involve in our response to the recent consultation on NRW's Partnership Funding Review.

We also have some concerns about the list of shared outcomes on page 10 as this makes no mention of conserving the environment. This is a significant omission if everything NRW does needs to contribute to one or more of these shared outcomes. We believe that the first of these outcomes should be amended to 'conserving and enhancing our environment' and that all of NRW's work should contribute to this outcome whilst also contributing to one or more of the other outcomes.

2. Are there any ways that you would like to work with us to achieve these shared outcomes?

CNP Cymru already works closely with NRW in a number of ways. NRW has observer status on the CNP Cymru committee and an officer from NRW usually attends these meetings. NRW officers also regularly attend CNP Council meetings and other events such as the annual National Park Societies' conference. In addition, over the last year or so we have worked closely with NRW to develop briefings as part of our grant funding arrangements, for example, we prepared one on energy infrastructure in protected landscapes. We would like to continue working with NRW in these and

other ways to support the work of the new organisation on protected landscapes and in engaging with the third sector.

We would also like to work with NRW on the development of activities relating to our Mosaic programme (see q8 for further information relating to this) such as engaging with those from under-represented groups. We are well placed to help facilitate this type of work because of our existing links to both groups in urban communities and local voluntary groups within the National Parks.

3. Do you have any ideas of new ways we can fund our activities with our partners?

Please see our response to the Partnership Funding Review.

A Good Environment

4. Do you agree with our proposals and suggested ways of delivering them?

5. Have we missed out anything significant?

There is nothing in the proposals for delivering a good environment that we disagree with. It is what is not there that causes us most concern. In particular, we are very concerned about the lack of reference to landscape protection and enhancement both of which will be essential aspects for delivering what NRW wants to achieve. In general, there is far too little coverage of landscape and seascape related activities in this list of proposals when the fact they should be a major feature, for example there is no mention of NRW's role in promoting the sustainable management of protected landscapes.

We are also concerned that there does not seem to be any recognition of the need to take maximum advantage of existing partnerships and arrangements, such as National Park Management Plans, in developing the new approach to natural resource management planning. We would like to see a clear commitment that, wherever possible, NRW will achieve its objectives through National Park Authorities (NPAs) and local authorities, for example, there are good opportunities to work closely with NPAs in delivering NRW's new responsibilities with regard to natural resource management planning.

6. How do we best work in partnership with you to deliver these? What can you do to help?

Please see our answer to question 2.

Good for People

7. Do you agree with our proposals and suggested ways of delivering them?

8. Have we missed out anything significant?

We agree with your proposals and particularly welcome the reference to providing and enabling recreation and access opportunities which contribute to improving people's health and wellbeing and to providing and enabling opportunities for people to learn in, and about, and enjoy the natural environment. We believe that National Parks have a key role to play in both these areas as they are our most valued landscapes offering the highest quality environment.

We also think there should be a specific reference to increasing access to, and use of, the environment for outdoor recreation by groups who are currently under-represented amongst those making use of the environment for outdoor recreation. The CNP Mosaic Wales project is currently working with all three National Park Authorities and the YHA to promote the physical and mental health benefits that National Parks offer to thousands of new people from black and ethnic minority communities in urban areas including Newport, Cardiff and Bangor. We are keen to ensure that there is an opportunity for other similar initiatives in Wales in future such as programmes to engage disadvantaged young people.

It is also noticeable that there is no explicit mention of volunteering in this section.

9. How do we best work in partnership with you to deliver these? What can you do to help?

NRW should provide enabling mechanisms and support for projects such as Mosaic to ensure that disadvantaged groups of people can gain greater access and understanding of the natural environment and the benefits this can bring. We can provide further information and advice on this issue based on our extensive experience of delivering the successful CNP Mosaic model of training influential urban community leaders to promote the National Parks to others in their community.

There is also a role for CNP Cymru here in representing the wide range of third sector organisations with an interest in National Parks and helping facilitate greater engagement.

Good for Business

10. Do you agree with our proposals and suggested ways of delivering them?

11. Have we missed out anything significant?

We agree with the majority of the proposals in this section. However, we are concerned that the reference to NRW's planning advice at the top of page 18 makes no mention of its responsibilities with regard to protected landscapes.

We also believe that the section on identifying, developing and supporting new business opportunities should acknowledge the potential opportunities arising from Wales' high quality environment, particularly in National Parks. This means that there needs to be more emphasis in this section on the protection and responsible stewardship of Wales' natural resources as well as their use. There should also be a reference to working with the tourism given the importance of Wales' high quality environment to the tourist industry and of the importance of tourism to the Welsh economy. Natural Resources Wales has recently supported research into the Value of Wales' National Parks which found that between them they attract 12 million visitors who generate £1 billion of spending on goods and services each year. However, this type of benefit is not considered in the proposals in the draft Corporate Plan.

12. How can you best work in partnership with us to deliver these?

We can help to promote the benefits that National Parks provide to the economy of Wales as we are already doing. We can also help facilitate links to the private sector as we work closely with the [Corporate Forum for National Parks](#) which includes several of the major businesses that operate in National Parks in both Wales and England.

Good Knowledge

13. Do you agree with our proposals and suggested ways of delivering them?

14. Have we missed out anything significant?

We broadly agree with these proposals. However, this section should also mention the precautionary principle since it may not always be possible to have the evidence base in place before a particular decision needs to be made.

It is also essential that the proposals to gather and disseminate evidence take account of NRW's responsibilities with regard to protected landscapes.

15. How can you best work in partnership with us to deliver these?

As CNP Cymru represents a wide range of third sector organisations with an interest in National Parks, we could help facilitate the gathering and dissemination of evidence relating to National Parks and particularly the third sector's role within them. The third sector is very well placed to help with

this work given its links to a range of different communities. However, we need support to do this work and would like to draw your attention again to the comments we made in response to the recent consultation on NRW's Partnership Funding Review, particularly with regard to the need for long-term strategic support.

How we work

16. Do you agree with how we plan to develop our organisation?

On page 20, there is a reference to NRW organising its teams and work in and around communities and catchments. There is huge potential for NRW to organise its work around protected landscapes given that these make up 25% of the area of Wales and could also act as a starting point for the development of natural resource management planning.

17. What would make it easier for you to work with us?

Please see our response to the recent consultation on NRW's Partnership Funding Review for further details on the kinds of things that would make it easier for us to work with you. We very much value the financial support we currently receive from NRW and are keen to see it continue.

Reporting on our delivery

18. Is this the right approach to assessing our delivery?

We welcome NRW's commitment to working in an open and transparent way and to reporting publicly on the outcomes it is achieving. However, it is essential that this assessment includes the monitoring, and reporting on, compliance with the S62 duty to have regard to National Park purposes.

NRW also needs to ensure that there is as wide engagement as possible in the development of its activities. This should include considering how hard to reach groups are involved in this process. We have experience of working with groups currently under-represented among users of the environment for outdoor recreation and would be happy to help facilitate greater engagement from these groups in shaping NRW's work.

19. Do you know of specific indicators you think we should track?

These are examples of the kind of specific indicators that we believe NRW should track separately for areas within National Parks in order to be able to ensure that the kind of success set out in answer to q20 can be achieved:

- percentage of species that are stable or increasing
- percentage of habitats that are stable or increasing
- % SSSIs in favourable and unfavourable recovering condition
- percentage of eligible land under agri-environment agreements
- areas subject to management agreements
- levels of participation in outdoor recreation
- Rights of Way
- Water quality
- The number and diversity of visitors to National Parks
- The health and well-being benefits of engaging with National Parks.

20. What will success look like?

National Parks which are distinctive and unique tracts of countryside and inspiring places for people to enjoy and improve their health and well-being as well as making a significant contribution to

sustainable economic development and increasing employment through tourism, farming, and other businesses and being adaptable and resilient to future pressures such as climate change.

21. Are there any further comments you would like to make?

NRW needs to play a strong leadership role in ensuring that relevant authorities comply with the duty to have regard to National Park statutory purposes while carrying out their activities. There is often a low awareness of this duty amongst the relevant authorities and, as a result, National Park purposes are given insufficient weight in policy decisions, particularly those involving other government departments and regulators. One example of this is the communications regulator, Ofcom, which has persistently failed to have regard to National Park purposes in decisions relating to BT Openreach and other telecommunications infrastructure.

We believe that NRW should be the champion of all matters relating to landscapes and seascapes, in particular the European Landscape Convention and National Parks [and AONBs] for which it has very specific statutory duties. This is especially important in view of the identification of landscapes and seascapes as key natural resources in the Environment Bill White Paper.

Finally, we would welcome some clarification about how NRW proposes to work with John Griffiths, the Minister responsible for National Parks, given that the organisation will primarily be reporting to a different Minister.

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