

Response from the Campaign for National Parks to Stage One of the Review of Designated Landscapes in Wales

Summary of key messages

- 1. We welcome the Welsh Government's commitment to give a new impetus to National Parks in Wales, making them fit for the future of Wales***
- 2. Welsh National Parks are iconic places which can and do deliver huge benefits for the people of Wales (whether or not they live, work or visit the Parks) and also for wider UK and worldwide audiences.***
- 3. They have great potential to deliver innovative ideas and to be exemplars of best practice where cutting edge thinking in landscape management and sustainability can be tested***
- 4. Their purposes should be refreshed to reflect 21st century imperatives and society's needs. We suggest four new purposes with an explicit priority for the first purpose where there is a conflict***
- 5. We recommend that the European Landscape Convention is endorsed in any new legislation***
- 6. There should be enhanced protection for Welsh National Parks against major development***
- 7. There should be a strengthening of the duty on public bodies so that they positively further National Park aims in their activities***
- 8. The boundaries of coastal National Parks should be extended to include their marine features and seascapes***
- 9. We do not support a single tier of landscape designation in Wales***
- 10. We do support the concept of a 'family of protected landscapes', particularly the sharing of best practice and creative solutions to achieve environmental and economic growth and maximise social benefits for the people of Wales***
- 11. We recognise the need to value and support the AONBs as part of a single family of protected landscapes***
- 12. National Park Authorities and AONBs in Wales should be properly resourced in the future to reflect their importance to the people, economy and environment of Wales***

1. Introduction

1.1 Who we are

The Campaign for National Parks (CNP) is the only charity dedicated to campaigning to protect and promote the 13 National Parks of England and Wales. Our mission is to inspire everyone to enjoy and look after National Parks. For over 75 years the Campaign for National Parks has been working to ensure that our National Parks are beautiful, inspirational places that are relevant, valued and protected for all.

1.2 What we do

CNP works with a wide variety of people and organisations, representing shared concerns, views and voices. We come together to address issues affecting National Parks and take action to keep these beautiful places safe. We therefore care deeply about Welsh National Parks and have undertaken many campaigns and projects in Wales. We have responded to numerous Welsh consultations (examples from just the last 2 years are shown in the box below). We are also involved in practical delivery in Welsh National Parks and are spearheading the MOSAIC Wales Project in the three National Parks (see Box 2 below). We are a forward- looking organisation which builds on lessons from the past. We have recently produced a 'Manifesto for National Parks for the 21st Century'¹. We work collaboratively with national and international organisations who share our aims, and we draw on a large pool of experts amongst our members, many of whom are actively involved in protected landscapes and their communities (including in Wales).

Box 1: Examples of CNP responses to Welsh consultations 2013-14

Feb 2014 Positive planning proposals to reform the planning system in Wales
Feb 2014 Brecon Beacons NPA Social Inclusion Strategy and Action Plan
Jan 2014 Welsh Proposals for an Environment Bill
Jan 2014 Natural Resources Wales Draft Corporate Plan
Sept 2013 Draft Policy Statement on Protected Areas (Taking the Long View)
Aug 2013 Williams Commission on Public Service and Delivery
Mar 2013 Welsh Government proposal for a Sustainable Development Bill
Jan 2013 Proposed Changes to Permitted Development Rights for non-domestic use

Box 2: MOSAIC Wales – Finding ways to open National Parks in Wales to people who have not visited them before

The Campaign for National Parks is co-ordinating the Mosaic Wales Project which aims to increase the number of first-time visitors from black and minority ethnic (BME) communities to Wales' three National Parks: Pembrokeshire Coast, the Brecon Beacons and Snowdonia.

¹ 'Manifesto for the National Parks' 2014 Campaign for National Parks
<http://www.cnp.org.uk/manifesto-national-parks>

We have recruited 'Community Champions', volunteers who have a growing passion for Wales' stunning countryside and who would like to get to know it better and share that passion with others. Community Champions currently come from Wrexham, Bangor, Swansea, Cardiff and Newport. They link to the Pembrokeshire Coast, the Brecon Beacons and Snowdonia National Parks and the rural communities living in them.

Graham Peake, the Pembrokeshire Coast National Park Authority's Discovery Team Leader, said: "Since April 2012, more than 600 people from BME communities in South and West Wales have been introduced to the National Park. Twenty two of those people have been trained as Community Champions and are now able to organise and lead events to bring others here".

Community Champion Sham Azam, of Diversity Outdoors, explained how she has benefited from being involved in Mosaic: "It's hard work because I also work full time, but when I hear feedback from people about the benefits of the visits to Pembrokeshire on their health and mental wellbeing, it's worth it. One lady said she'd no idea there was such a beautiful place just two hours from her home, and she's wanted to book on every visit ever since."

Mosaic Project Manager, Sarah Wilson, said "It's been fantastic to celebrate all the work the Community Champions have done to inspire others to understand and enjoy Wales' National Parks here in Pembrokeshire. As more people get to know and love our National Parks, we hope this will help protect these fantastic places for the future."

The Mosaic Wales Project is funded by the Big Lottery Fund's People and Places Programme, with contributions from the Welsh National Park Authorities and the Youth Hostels Association.

1.3 Why we are responding

1.3.1 The National Parks of England and Wales are national treasures that must be fought for and defended. We strongly believe that National Parks contribute significantly to the well-being of Wales, by providing safe, attractive, healthy places for recreation. We know that they also play a vital role in sustainable development through protection of the landscape, wildlife and key environmental resources and through providing services, like water and carbon storage in peat soils and forests, which can mitigate the effects of climate change. They are an essential part of Welsh agriculture and provide high-quality food and local products. Snowdonia, the Brecon Beacons and the Pembrokeshire Coast are inspiring places for people to enjoy and improve their health and well-being, and they make a significant contribution to the economy through tourism, farming, and other related businesses. Recent research for National Parks Wales² found that overall, the economies of the three Welsh National Parks account for £557 million Gross Value Added (GVA) and their environments directly support 10,738 jobs within their boundaries plus a further 2,033 jobs across Wales. The same research also found that the three Parks receive 12 million visitors per annum who spend an estimated £1 billion on goods and services each year.

1.3.2 We share many of the views of other environmental bodies including the Alliance for National Parks Cymru, NAAONBs, and National Parks Wales but we also have our own

² 'Valuing Wales' National Parks' 2013 National Parks Wales

http://www.nationalparkswales.gov.uk/data/assets/pdf_file/0009/389727/Valuing-Wales-National-Parks-.pdf

recommendations based on our long experience of protected landscapes which we wish the Panel to consider.

1.3.3 We are focusing our comments on National Parks as that is our remit. They are iconic landscapes and have a world-wide resonance that should be retained at all costs. However, we do not want to see any reduction in the protection of Welsh AONBs and we strongly advocate that the opportunity should be taken to increase protection for both National Parks and AONBs. Both have a really important contribution to make to the health and wealth of Wales.

Our response seeks to address the two questions posed in Stage 1 of the review with some additional points. Our key points and recommendations are summarised in section 4.

2. Our response to Question 1: 'Are designated landscapes equipped to meet the current and future needs of Wales?'

We welcome the aspirations and vision for protected landscapes as set out in the Remit and Terms of Reference of this review. In particular, we are pleased to see references to ecosystem services, sustainable development, natural resource management and the health and wellbeing of visitors and residents. We believe that the National Parks of Wales are already delivering these vital requirements and have great potential to provide even more benefits for people and the environment in the future.

2.1 Meeting the current need

We believe that currently National Parks Authorities in Wales do a fantastic job on limited resources. As we reported to the Williams Commission³ we consider their strengths to include the following

- They are able, in collaboration, to deliver multiple policy outcomes for a sustainable economy, environmental resource management, protection and enhancement of natural, cultural and historic heritage, conservation management, social inclusion, physical and mental health and wellbeing of visitors and residents.
- They deliver significant added value and are exemplars in partnership working
- Management of National Parks requires knowledge of local issues and engagement of local people, whilst protecting nationally important assets.
- NPAs represent excellent value for money and are able to lever in significant resources to support these nationally important landscapes.
- They collaborate with local authorities to foster economic and social wellbeing for those living and working in National Parks.
- They are promoters and gatekeepers of Welsh culture (including language).
- They promote sustainable development, including tourism which is helping to address economic challenges such as low wages and seasonal employment.

2.2 Meeting future needs

We believe that there are great opportunities for the National Parks of Wales to meet the challenges of the future and realise their potential as set out in the Terms of Reference for this review and in 'Taking the Long View'⁴. They can

³ CNP Evidence to the Williams Commission on Public Service and Delivery August 2013

⁴ 'Taking the Long View: Consultation on the draft Policy Statement for Protected Landscapes in Wales' June 2013
Welsh Government <http://wales.gov.uk/docs/drah/consultation/130628protectlandscapedraften.pdf>

- Contribute to innovative solutions to strategic national challenges such as the potential impacts of population growth, an increasingly mobile society, climate change, agricultural reform, a continuing decline in biodiversity, and social and economic inequality
- Promote environmental growth alongside economic growth
- Deliver significant benefits for the mental and physical health of residents and visitors
- Promote Welsh language and culture
- Safeguard and enhance natural resources
- Listen to and help local communities to achieve their aspirations and take pride in the landscape around them

Box 3: Welsh National Parks meeting future needs for health and wellbeing

A recent investigation by CNP⁵ into the impact of National Parks on health and wellbeing, surveyed Mosaic Community Champions in Wales. The results demonstrate clearly that using National Parks has positive impacts on their health and wellbeing. 63% of respondents said they have significantly increased the amount of exercise they take since being a Community Champion and visiting National Parks and all respondents said they feel positive after visiting a National Park. Of these three quarters said the positive feeling lasts more than a week (feeling positive is a key part of wellbeing).

'It has given me motivation to carry on walking in parks in my community and to go for longer walks in the National Park too' Dawn, Wrexham

'Oh yes – I've been doing loads more fitness stuff and I don't think it is coincidental. I did lots of swimming around the lakes and getting into the National Parks as much as possible.' Homan, Bangor

2.3 Key principles for protected landscapes in the future

We set out below a set of principles which we think should apply to Welsh protected areas in the 21st century and to National Parks in particular. In line with the inspirational vision set out in the Minister's Written Statement of 25th September 2014, they should

- have designations that are 'fit for the future' (e.g. delivering the requirements of modern society whilst protecting and enhancing their environmental and cultural values)
- offer exemplars of good management in planning, sustainable development and access
- promote ownership of and pride in these special places for Welsh people
- build on the existing international status and brand recognition of 'National Parks'
- deliver significant health and well-being benefits
- provide an engine for both environmental and economic growth
- contribute to energy security
- provide natural resources such as water, food and carbon storage.

⁵ 'Investigating the impact of National Parks on Health and Wellbeing' 2014 Sarah Wilson CNP
<http://www.cnp.org.uk/sites/default/files/uploadsfiles/140530%20Impact%20of%20National%20Parks%20on%20Health%20and%20Wellbeing.pdf>

2.4 Legislative and policy changes needed to meet these needs

We welcome the statement in the Terms of Reference for this review that in the future designated landscapes will be expected to deliver natural resource management and pursue the achievement of the six well-being goals as set out within the Well-being of Future Generations (Wales) Bill. They will provide an essential contribution to a prosperous, resilient, healthier Wales with more equal and cohesive communities with a vibrant culture and thriving Welsh language⁶. We know that National Park Authorities are already delivering against these goals and are well placed to respond to the needs of both local communities and visitors. They are increasingly taking an ecosystem approach to managing these special places and they are adept at identifying and juggling priorities whilst retaining basic environmental and cultural values.

The strategic context within which designated landscapes currently deliver their statutory duties and promote sustainable development is provided by Welsh legislation and Welsh Government policy, operating within the framework of UK and European legislation,. There are a number of areas where we think changes in legislation and policy could help to meet the challenge of sustainability in these fragile rural landscapes.

2.4.1 European Landscape Convention

Welsh National Parks are well placed to fulfil the provisions of the European Landscape Convention (ELC)⁷ signed and ratified by the UK. This defines landscapes as ‘an area, as perceived by people, whose character is the result of the action and interaction of natural and/or human factors’. The Convention recognises the importance of all landscapes but also supports international systems of planning, management, conservation and protection for nationally important landscapes as well as exchange of information, mutual assistance across Europe. We would like to see the ELC endorsed in any new statutes.

2.4.2 Enhanced protection against major development in National Parks

The major development test is a well-established part of the planning process which makes it clear that planning permission should be refused for major developments in National Parks and AONBs except in exceptional circumstances and where it can be demonstrated they are in the public interest. We want a stronger version of this test to be included in any new legislative framework.

Currently the major development test is set out in paragraph 5.5.6 of Planning Policy Wales (PPW). PPW sets out the Welsh Government’s planning policies and how these are expected to be applied. PPW must be considered when making planning decisions. It is essential that the major development test is retained. However, it is only one of a number of planning policies that those deciding on planning applications have to take into account and there is always a risk that it is not given sufficient emphasis.

There would be much stronger protection for National Parks if the major development test was enshrined in legislation using the wording originally proposed by Lord Norrie for inclusion in the Environment Act 1995. In particular, it should be made clear that proposals for major

⁶ ‘Valuing Wales’ National Parks’ 2013 National Parks Wales

http://www.nationalparkswales.gov.uk/data/assets/pdf_file/0009/389727/Valuing-Wales-National-Parks-.pdf

⁷ European Landscape Convention

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/236096/8413.pdf

<http://www.landscapeinstitute.co.uk/policy/EuropeanLandscapeConvention.php>

developments in National Parks will be permitted only if, following rigorous public examination, it is demonstrated that they satisfy the following conditions:

- (i) that the proposal is absolutely necessary in the national interest, which includes the furtherance of National Park purposes; and
- (ii) that the proposal cannot practically be accommodated in an alternative location outside the National Park.

2.4.3 The duty on public bodies

Current legislation requires that ‘in exercising or performing any functions in relation to, or so as to affect land’ within National Parks, a ‘relevant authority shall have regard to’ the statutory purposes of National Parks. This requirement is in Section 11A(2) of the National Parks and Access to the Countryside Act 1949 as amended by Section 62(2) of the Environment Act 1995 and is often referred to as “the S62 duty”. The definition of relevant authority includes any public body and the duty applies to all decisions and activities that may affect land within a National Park and not just those that relate to planning, countryside and related environmental matters. The duty also applies to activities undertaken outside National Park boundaries which may affect land within them. We believe strongly that this duty should be strengthened by replacing the ‘having regard to’ with ‘have a duty to further national park purposes’.

2.4.4 The statutory purposes of protected landscapes

We believe the existing statutory purposes have stood the test of time, but should now be refreshed to reflect the enhanced role that National Parks can play in the future of Wales.

We suggest four new purposes as follows:

- ***To conserve and enhance the natural beauty⁸, tranquillity, landscape, and cultural heritage of the area;***
- ***To safeguard ecosystem services (natural provisioning, regulating, supporting and cultural services), while enabling sustainable use of the natural resources of the area;***
- ***To promote human physical and mental well-being through encouraging greater contact with, and enjoyment and understanding of, the natural beauty, tranquillity, landscape and cultural heritage of the area;***
- ***To promote sustainable forms of economic and community development which support the conservation and enhancement of the natural beauty, tranquillity, landscape and cultural heritage of the area.***

And if it appears that there is a conflict between any of the four park purposes, then greater weight must be given to the first of these purposes.

⁸ Following the Meyrick case in the New Forest National Park, the Natural Environment and Rural Communities Act 2006 re-defined ‘natural beauty’ to include wildlife and cultural heritage, and clarified that natural beauty may consist of, or include, land used for agriculture or woodlands, or used as a park, or an area whose flora, fauna or physiographical features are partly the product of human intervention in the landscape.

2.4.5 Embracing the marine environment

There is a growing awareness of the importance of seascapes, and the life within them and there is a desperate need to manage these resources sustainably and make best use of the ecosystem services they provide (fish, recreational opportunities etc.). The maritime dimension of coastal national parks has not so far been adequately recognised. We believe that boundaries here should be extended out to sea and included in the forthcoming Marine Plan for Wales.

2.4.6 Other possible changes

In 2013 we produced a report⁹ which sets out the key role that National Parks can play in helping to deliver the Welsh Government's new approach to natural resource management. This report clearly identifies the National Park Authorities as leaders in facilitating sustainable use of the natural environment and includes a number of recommendations aimed at ensuring they are able to deliver that role effectively in the future.

3. Our response to Question 2: 'Should there be a single designation of protected landscape in Wales?'

3.1 We respectfully challenge the presumption that there is a two-tier system of protected landscapes in Wales. There are many landscape and related designations including Heritage Coasts, SSSIs and Historic Landscapes. National Parks and AONBs are part of this complex jigsaw.

3.2 We do not support the idea of a single landscape designation for Wales. We believe that the National Parks are Welsh icons and that they need to retain this specific status to achieve their socio-economic potential. The national and international brand of Welsh National Parks is a significant factor in their success (see quotes from Visit Wales website in Box 3).

3.3 We have concerns that a single tier designation will lead to a downgrading of status and resources for National Parks, and undermine their unique brand and image. We consider there could be significant risks to the benefits which they are currently providing and that they may not be able to realise their full potential as international flagships for sustainable development.

3.4 We are also concerned that there could be risks to the international status (IUCN designation) of Welsh National Parks which would impact adversely on their brand and marketing potential (and thereby jobs and services). The protected landscapes of Wales currently meet international standards as part of a global framework for categorising the variety of protected areas around the world. The IUCN has recently endorsed the Welsh National Parks as Category V Protected Areas because 'legislation for the fifteen national parks in the UK affords a statutory basis which delivers nature conservation goals'.¹⁰ This will be reported to the IUCN World Parks Congress in Sydney, Australia in November 2014. The international status for Welsh National Parks is a result of the long history and experience of prioritising conservation objectives within their boundaries whilst they continue to be vibrant, lived-in,

⁹ 'Delivering the Living Wales programme: realising the potential of National Parks' 2013 CNP Cymru <http://www.cnp.org.uk/sites/default/files/uploadsfiles/Full%20briefing%20on%20the%20challenges%20and%20opportunities%20for%20NPs.pdf>

¹⁰ Roger Crofts, Nigel Dudley, Chris Mahon, Richard Partington, Adrian Phillips, Stewart Pritchard, Sue Stolton (2014). Putting Nature on the Map: A Report and Recommendations on the Use of the IUCN System of Protected Area Categorisation in the UK. United Kingdom: IUCN National Committee UK http://www.iucn-uk.org/portals/0/PNOTM_2014_full_report.pdf

working landscapes - they are regarded as worldwide pioneers in this field. Any loss of this status is likely to have significant impact on the value of National Parks to the Welsh economy.

Box 4: Quotes from 'Visit Wales' website

'Together Wales's three National Parks protect an impressive 20% of Wales, including precious landscapes, habitats, villages and heritage sites. They're perfect for active weekends and holidays the glorious outdoors'

'With wild landscapes steeped in history, Snowdonia is a breathtaking place for an activity holiday'

'From limestone caves to mountain trails, there's plenty to explore in this gem of a national park' (Brecon Beacons National Park)

'World famous for its beaches, cliffs and wildlife with endless opportunities to enjoy the outdoors' (Pembrokeshire Coast National Park)

3.5 We do believe however that there are merits in the concept of a 'family of protected landscapes'. As in any family, there are opportunities for different members to share information and talents, to act collaboratively and to co-operate whilst retaining their individuality. In practice we think this family should include Welsh National Parks and AONBs and possibly landscapes with other designations. We look forward to contributing our ideas on how any future governance would best promote collaboration and joint working whilst avoiding duplication as part of Stage 2 of this Review.

3.6 We support the idea of sharing expertise, knowledge, best practice and innovative, experimental approaches across the family. This already happens between National Parks and AONBs in Wales and between Welsh, other UK and European protected landscapes (through Europarc for example), but collaboration should be facilitated further, more actively encouraged and enhanced. The digital future with improved broadband access is likely to make this easier and cheaper e.g. through using social media, virtual meetings, cloud technology etc.

3.7 There are increasing opportunities for co-operation with less familiar partners such as the health, business and community sectors. National Park Authorities excel at establishing and maintaining cross-cutting partnerships and promoting innovation and given sufficient resources, will undoubtedly be able to build on this in the future, finding common ground and sharing objectives and resources.

4. Key points and recommendations

- i) We welcome the Welsh Government's commitment to give a new impetus to National Parks in Wales, making them fit for the future of Wales***
- ii) Welsh National Parks are iconic places which can and do deliver huge benefits for the people of Wales (whether or not they live, work or visit the Parks) and also for wider UK and worldwide audiences.***

- iii) They have great potential to deliver innovative ideas and to be exemplars of best practice where cutting edge thinking in landscape management and sustainability can be tested**
- iv) Their purposes should be refreshed to reflect 21st century imperatives and society's needs. We suggest four new purposes with an explicit priority for the first purpose where there is a conflict**
- v) We recommend that the European Landscape Convention is endorsed in any new legislation**
- vi) There should be enhanced protection for Welsh National Parks against major development**
- vii) There should be a strengthening of the duty on public bodies so that they positively further National Park aims in their activities**
- viii) The boundaries of coastal national parks should be extended to include their marine features and seascapes**
- ix) We do not support a single tier of landscape designation in Wales**
- x) We do support the concept of a 'family of protected landscapes', particularly the sharing of best practice and creative solutions to achieve environmental and economic growth and maximise social benefits for the people of Wales**
- xi) We recognise the need to value and support the AONBs as part of a single family of protected landscapes**
- xii) National Park Authorities and AONBs in Wales should be properly resourced in the future to reflect their importance to the people, economy and environment of Wales**

5. Next steps

5.1 We would be pleased to give oral evidence to the Panel to expand on any of these points and/or discuss any aspects where the Panel would like further information and greater clarity.

5.2 We believe strongly that the views of the residents and visitors to National Parks should be considered as part of the review and we trust that the Panel are providing opportunities for this through effective publicity and discussion. We would be very pleased to help the Panel facilitate the engagement of BME communities through our Mosaic Community Champions.

5.3 We look forward to contributing to the second stage of the review.

For further information about any aspect of this submission, please contact Ruth Bradshaw, Policy and Research Manager (email:ruthb@cnp.org.uk, tel: 020 7981 0896)