

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

1. Introduction

1.1 Who we are

1.1 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

1.2.1 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 are also involved in practical delivery and led the Mosaic Wales Project in the three National Parks (see Box 1 below). 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.

Box 1: Mosaic Wales¹ – Finding ways to open National Parks in Wales to people who have not visited them before

The Campaign for National Parks co-ordinated the Mosaic Wales Project which was set up to increase the number of first-time visitors from black and minority ethnic (BME) communities to Wales' three National Parks.

We recruited 68 'Community Champions' - volunteers with a growing passion for Wales' stunning countryside - who wanted to get to know it better and share that passion with others. Community Champions came from Wrexham, Bangor, Swansea, Cardiff and Newport and introduced 2,200 people to the National Parks for the first time.

This project has finished but we continue to support the Champions and we are setting up a new project to introduce those from urban areas in Wales to National Parks.

1.2.2 We support the response submitted by the Alliance for National Parks Cymru. However, we also have our own recommendations based on our long experience of protected landscapes which we wish the panel to consider.

¹ The Mosaic Wales Project was 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 Structure of our response

1.3.1 Our response seeks to address the issues raised in the request for evidence for Stage Two of the review. However, we start by making some comments on the recommendations for Stage One of the review as part of the context to our response. We then go on to describe our vision for Wales's designated landscapes and a set of principles for the governance arrangements of designated landscapes if that vision is to be achieved. The majority of the response focuses on considering the implications of those principles for the governance and management arrangements of National Parks. In all of this, we have taken a broad interpretation of governance so our response addresses wider issues as well as those relating to the bodies directly responsible for governing designated landscapes. Recognising that the panel wish to consider other models, both inside and outside the UK, we have drawn on our experience as a body representing organisations in both England and Wales to provide a number of examples from English National Parks.

1.3.2 Our comments are focused 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 well-being of Wales.

1.3.3 Our key points and recommendations are summarised in section 9.

2. Comments on the recommendations for Stage One

2.1 We are broadly supportive of the panel's recommendations for Stage One of the review and for the most part we believe that these provide a good starting point for agreeing what the governance arrangements need to deliver. However, we are concerned about the lack of an explicit reference to the Sandford principle within the recommendations. The panel set out their support for this in their list of guiding principles in paragraph 8.1.2 which also discusses a 'Sandford Plus' approach to allow for having more than two purposes. There is no reference to this in recommendation 5, however, which lists the proposed new purposes. We would welcome reassurance from the panel that they intend to make an explicit recommendation for a 'Sandford Plus' approach whereby the conservation purpose would be given priority over the other two if there are clear conflicts.

2.2 We would also welcome some clarification as to what is intended for the sustainable resource management purpose. We do not understand why the panel have suggested that natural resource management and community and economic development should support only the cultural heritage of the area. It would make more sense and ensure that the purposes were truly 'interlocking' if the third purpose referred to supporting 'the distinctive landscape and seascape qualities of the area and mental and physical well-being.'

2.3 We would also highlight that while we welcome the proposed new wording of the conservation purpose the footnote which defines what is meant by 'landscape' in this context (footnote 1 on page 7, footnote 3 on page 32) is critically important to make sure that issues such as biodiversity are still covered by this purpose. If and when these purposes are taken forward following the review, it will be essential that the detail of this footnote is not lost.

3. Vision and Principles

3.1 A vision for designated landscapes in Wales

3.1.1 As we set out in our response to Stage One of the review, we believe that there are great opportunities for the National Parks of Wales to meet the challenges of the future. In particular, they can:

- Contribute 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

3.1.2 Our vision for designated landscapes in Wales is based on the one agreed by the Wales Landscape Partnership². Designated landscapes should be places recognised and supported as:

Robust environmental shock absorbers. Where priority is given to safeguarding and conserving biodiversity, clean water, carbon in peat, soils and woodlands.

One Planet spaces. Where the backdrop of their high quality landscapes inspires low carbon lifestyles, construction based on progressive design and low impact building techniques, sustainable travel patterns and responsible local renewable energy generation; all of which collectively ensure their transition to areas with a low carbon footprint.

Promoters of rural distinctiveness. Where celebration of the cultural heritage, the quality of the environment and ways of living create prosperity and opportunities for self-supporting local economies to prosper. Where strong social networks, innovative partnerships and collaborative action provide an effective way of overcoming the challenges of living in rural areas.

Resources for public well-being. Outdoor arenas of enjoyment and inspiration where the benefits of contact with the natural world, physical activity and appropriate unobtrusive leisure experiences are promoted because of the health and personal benefits they provide to all sectors of society in an inclusive and appealing manner.

Refuges of peace and quiet. Places where people can find, experience and enjoy solitude.

Places where the defining associations between adjacent areas of land and sea are managed seamlessly and in an integrated and inclusive manner.

Ambassadors of the European Landscape Convention, at the centre of the debate about public well-being and demonstrating the virtues of well managed landscapes and the benefits of public investment in them.

² Wales Landscape Partnership, An agenda for Wales' Protected Landscapes

3.2 Principles for the governance of designated landscapes in Wales

3.2.1 We have developed a set of principles which we believe should apply to the governance of all Wales's designated landscapes, in order to achieve the vision set out above. These are based on the five principles for the good governance of protected areas³ developed by the International Union for the Conservation of Nature (IUCN). If these principles are delivered in an integrated way across designated areas we believe it would help ensure they deliver multiple benefits for Wales and local communities.

Representation: Participation in the governance of these national assets should reflect Welsh society in terms of gender, disability and ethnicity. Welsh people should have a sense of ownership and pride in these special places.

Accountability and transparency: Decision-makers should be accountable to the public, decision-making processes should be transparent and relevant information should be made available to all stakeholders in a fair, transparent and timely manner.

Performance/Leadership: There should be an integrated approach to the management of National Parks which delivers multiple benefits to the environment, society and the economy. National Parks should demonstrate best practice in areas such as planning, sustainable development and access.

Consider both local and national needs: Decisions on National Parks must consider the needs of local residents and businesses along with the fact that these are national assets which have been designated for the benefit and enjoyment of the nation. Decisions should aim to further both local and national interests.

Value-for-money: The governance and management of National Parks should be undertaken in a way, and at the level, which is most efficient and effective.

3.2.2 The following sections of our response discuss each of these principles in turn, identify areas for improvement and provide some suggestions for changes that the panel may wish to consider.

4. Representation

4.1 Background

4.1.1 As the panel has already identified in the call for evidence, the governance arrangements for National Parks are not currently very representative of Welsh society in terms of gender, disability and ethnicity. This is something that the Campaign for National Parks has been seeking to address for some time. One of the aims of Mosaic Wales (see Box 1 for further details) was to get greater representation in decision-making in National Park Authorities.

4.1.2 A number of lessons were learnt as part of Mosaic Wales and these are set out below along with details of a pilot scheme that the Welsh Government has recently set up. Whilst it is too early to consider the success of this pilot scheme, it is clear that it addresses many of the lessons learnt from the Mosaic project and could play an important role in helping secure better representation in the governance of protected landscapes. It is also clear that by ensuring that under-represented groups have an opportunity to experience National Parks in the first place, projects such as Mosaic have a key role to play in encouraging wider representation in the governance of National Parks.

³http://cmsdata.iucn.org/downloads/draft_paper_iucn_for_environmental_justice_conf.pdf

4.1.3 We believe that it would be of great value to the panel to hear first-hand from those participating in the pilot project in order to explore this issue in greater detail. We would be pleased to help facilitate engagement with those involved.

4.2 Lessons from Mosaic Wales

4.2.1 The most important lesson is that people from under-represented communities need an opportunity to learn about and develop an interest in National Parks in the first place. Community Champions did not know anything about National Parks before becoming Champions and it took at least a year's participation in Mosaic for those who were interested in getting more involved to feel they had enough knowledge about National Parks and the confidence to take it to the next level, for example by applying to join a board.

4.2.2 Another key lesson is that spending time together informally is the best way of breaking down (perceived) barriers. One of the most successful things that Mosaic did in opening up access to BME groups to enable them to get involved with decision-making bodies, was to facilitate as many informal and face-to-face encounters between board members and Mosaic Champions as was possible. For example, chatting to someone on a walk along the Pembrokeshire Coast made both board members and Champions relax and make personal contact. This allowed the Champions to feel comfortable about making contact or attending a board meeting. This approach was also important for board members, some of whom had felt nervous about making a faux pas or insulting someone accidentally.

4.2.3 The other successful thing that Mosaic did was to bring Champions into board meetings to make presentations to members - about Mosaic and about what they were getting out of being involved in National Parks. This was a useful way of starting the discussion about how NPAs could be more accessible to more people. For a lot of Champions who did this, going into a members' meeting (or the Senedd) was a big thing. *'The first time I went to the National Park Authority there was a sense of important decisions being made. It was empowering being asked to help look after these places that are beautiful and important to people in Wales.'* Brecon Beacons Community Champion *'Mosaic crossed the lines between ordinary people and decisions being made'*, said another Champion.

4.2.4 Attending these meetings gave Champions an understanding of how the institutions worked and made them feel more confident to apply for board positions. By the end of the project, in addition to those taking part in the pilot set out below, a further five Champions were interested in applying to become members or taking part in a similar shadowing scheme.

4.2.5 The biggest reasons, aside from knowledge and confidence, for not getting involved in boards and governance were living too far from the NPA, not having access to private transport and not having enough time to commit to it. Most Champions are of working age (rather than retired) and most have strong family commitments.

4.3 Pilot scheme aimed at improving representation

4.3.1 The Welsh Government is currently running a pilot scheme which allows volunteers interested in taking up governance positions on public boards to shadow a board member for a period of six months. Two Champions and one ex-Mosaic project officer are taking part in the pilot from April to September 2015 with the Brecon Beacons National Park Authority. They will shadow different board members according to their interests over the six months and attend Authority meetings and other events. The timing is designed to fit with the next round of Welsh Government appointments to the Brecon Beacons board in autumn 2015. If they are interested, those who have

taken part in the pilot will apply through the normal channels. We are keen that the panel should recommend the setting up of other similar schemes if this initiative proves successful.

5. Accountability and Transparency

5.1 Background

5.1.1 The report of the Review of Public Service and Delivery⁴ (the Williams Commission report) published in January 2014 discusses the issue of accountability in some detail and suggested that there needs to be reform of the membership of NPAs to ensure that members represent the areas that the Parks cover, and are thus democratically accountable for the decisions they make. The report recommended that local authority-nominated NPA members must represent wards which fall wholly within the Park area or, if that is impossible, partly within the Park area. It also suggested that the Welsh Government should consider whether directly electing NPA members would strengthen such accountability. We believe that more could be done to improve the local accountability of NPAs but we do not believe that there is any need for directly electing NPA members. Both these issues are discussed further below.

5.2 Improving local accountability

5.2.1 Currently in Wales, two thirds of the members of each NPA are nominated by local authorities in the area and one-third are appointed by Welsh Government. However, there is no requirement that the local authority appoints members whose wards are within the National Park. In England, a proportion of NPA members are appointed by the Secretary of State after they are elected by Parish Councils in the National Park. These people are representatives of the local communities in the National Park, not just their own parish and this system means that local people are always represented in the running of the National Park.

5.2.2 There is a need to improve the local accountability of NPAs in Wales. The simplest way to do this would be to adopt the recommendation of the Williams Commission and require local authorities to appoint members who represent wards which are at least partially within the Park and which reflect a geographical spread across the Park. This may require allowing local authorities to depart from the political balance rule but they should only be allowed to do so in order to appoint representatives from within the Park as it is also important that NPAs do not become politically imbalanced. Alternatively, consideration could be given to allocating some of the local authority appointed places on NPA boards to representatives from Town and Community councils within the Park who would be appointed on the same basis that Parish Council representatives are appointed in England.

5.2.3 There are a number of other approaches that NPAs elsewhere have already adopted to improve their engagement with local communities, some of which also provide an opportunity for communities to hold them to account. For example, Exmoor National Park Authority has set up a Consultative and Parish Forum⁵ for consultation and discussion with representatives of Parish, District and County Councils and other organisations with an interest in the National Park. This meets five times a year and provides an opportunity for consultation and discussion on matters affecting the National Park.

5.2.4 The Peak District National Park Authority has a Parishes Forum which provides an opportunity for these Councils to liaise, and consult with the NPA and to ensure good working

⁴<http://gov.wales/docs/dpsp/publications/psgd/140120-psgd-full-report-env2.pdf>

⁵<http://www.exmoor-nationalpark.gov.uk/about-us/committees/consultative-and-parish-forum>

relationships. Each member is also allocated responsibility for a particular part of the Park⁶ and there is a Youth Forum⁷ for those aged 11-18. This meets four times a year and gives young people a voice in the running of the National Park. A Youth Forum could also be a useful way of introducing people to the role of National Park governance and therefore helping to encourage people to put themselves forward for National Park boards at an earlier age.

5.3 Direct elections

5.3.1 The Campaign for National Parks does not believe that direct elections should be introduced for NPA members for the following reasons:

- Direct elections for NPAs will be complex and costly to introduce at a time of continuing financial restraint in the public sector when the focus should be on other priorities. A 2012 consultation⁸ in England estimated the cost of holding direct elections in two NPAs to be in the region of £100,000 to £200,000. If direct elections are to be introduced this cost should not come out of NPAs' existing budgets.
- There is a risk that members with strong anti-Park or single issue views might be elected and that party politics might end up playing a greater role in NPA governance.
- There is also a risk that NPAs will lose the range of expertise they need to perform their role effectively. Currently nationally appointed members have to complete an application process to demonstrate the skills they bring to the role and appointments are made in a way which ensures the availability of skills in areas such as heritage, biodiversity etc that the NPA needs.
- It would be harder to ensure the right mix of skills on sub-committees as well as ensuring representation from all the different types of appointee and political balance.

5.3.2 Direct elections are already required for a minimum of 20% of NPA members in Scotland. When the Scottish National Parks were set up, direct elections were seen as an important way of securing local democratic accountability. However, to date there appears to have been little attempt to assess whether this has led to the NPAs being more accountable, whether direct elections have improved the mix of skills available to NPAs or made them more effective. We believe that having the right balance between local and national representation is far more important (see section 7 for further details on this).

6. Performance/Leadership

6.1 Background

6.1.1 The real test of the performance of a National Park is whether it is delivering its statutory purposes effectively. While NPAs have a key role to play in delivering the purposes, they cannot do this alone, particularly if the purposes are to be broadened to include well-being and natural resource management. Other public bodies, including Natural Resources Wales (NRW), have an important role to play as do partners from the voluntary and private sectors. There need to be new

⁶ <https://democracy.peakdistrict.gov.uk/mgMemberIndex.aspx?VW=TABLE&PIC=1&FN>

⁷ <http://www.peakdistrict.gov.uk/learning-about/peak-district-youth-forum>

⁸ https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/82458/20120308-national-park-consult-doc.pdf

approaches to governing and managing National Parks which ensure that all these players are involved. We discuss this issue in more detail below.

6.2 Ensuring all partners are contributing to the delivery of National Park purposes

6.2.1 We support the recommendation (no.6) in the panel's report from Stage One of the review to strengthen the S62 duty but we would like to propose further changes to strengthen this duty still further. We propose that all relevant organisations should be involved in the preparation of National Park Management Plans and should be required to produce statements setting out how they will fulfil the S62 duty. These statements should then be included in the Management Plans. This will ensure that relevant organisations give greater priority to delivering the purposes as they will need to be very clear about the processes and systems they have in place for ensuring they are meeting these duties. Including the statements in Management Plans will also mean that they are publicly available and make it easier for National Park Authorities, National Park Societies and other partners to hold relevant organisations to account.

6.2.2 A further way of involving all the relevant partners effectively is to establish some form of advisory group or partnership board. The Peak District National Park has established an advisory group⁹ to review progress on the delivery of its management plan and champion specific issues. This brings together representatives from a range of different organisations with responsibility for delivering aspects of the plan and has an independent chair.

6.2.3 In Exmoor, a Partnership Plan¹⁰ has been produced jointly by the National Park Authority and its partners setting out how they will work together to achieve National Park purposes over a five year period. This has been accompanied by the creation of a Partnership Panel and Strategic Overview Groups that are led by other partners (not the NPA) and which are each allocated specific responsibility for monitoring and reporting on progress on particular objectives in the Plan.

6.2.4 Similarly, in the Lake District, the National Park Authority has established a partnership¹¹ of representatives of the public, private, community and voluntary sectors. This too has an independent chair and the partners have agreed a memorandum of understanding and committed to work together on an overall vision for the National Park. The partnership is also responsible for developing, agreeing and monitoring the Management Plan for the Park. Anecdotal feedback suggests that there are both advantages and drawbacks to bringing together this wide range of partners. It can take time to reach agreement and it is hard to deal with issues where there are significant differences of opinion. However, it is also a useful way of ensuring that all partners understand each other's concerns and objectives.

6.3 National leadership on protected landscapes

6.3.1 Wales's National Parks need strong leadership at a national level and a Ministerial champion if they are to fulfil their potential. Protected landscapes have a significant contribution to make to the achievement of many government objectives, including those relating to well-being and natural resource management and Welsh Government should recognise this by providing the necessary policy framework and resources for them.

6.3.2 In addition to greater political commitment to strengthening and enhancing National Parks, there is a need for a body with a clear remit to ensure that all parts of government are supporting National Parks. Currently NRW should be the body that champions protected landscapes at a

⁹<http://www.peakdistrict.gov.uk/microsites/npmp/about-the-plan/advisory-group>

¹⁰ http://www.exmoor-nationalpark.gov.uk/__data/assets/pdf_file/0010/260857/PP-Full-version1.pdf

¹¹<http://www.lakedistrict.gov.uk/aboutus/partnership>

national level in Wales, particularly within government, but we are very concerned that it is not doing this job effectively. It is essential that NRW has adequate resources and commitment to continue to protect and enhance National Parks and to promote the statutory National Park purposes. It should also be given clear direction from Welsh Government as to the importance of this role.

6.3.3 NRW should have the structures, resources and specialist expertise at a senior level to ensure that the organisation is able to:

- promote a landscape scale approach to nature conservation and enhancement and natural resource management;
- support designated landscapes in an integrated way across the organisation;
- devote adequate staff time and resources to both landscapes and seascapes;
- monitor and enforce the statutory requirements relating to National Parks, such as the S62 duty to have regard to National Park purposes;
- provide a dedicated team to support protected landscapes; and
- realise the full potential of National Parks to contribute to other Welsh Government objectives such as health and well-being.

6.3.4 If NRW is unable to do its job effectively the alternative is to set up a new national body responsible for providing national leadership on protected landscapes. However, we have a number of reservations about this idea and there should not be a need for such a body if NRW does its job effectively and both NRW and the NPAs are adequately resourced. If necessary, further statutory obligations should be imposed on NRW to ensure it is fulfilling its role.

6.3.5 Establishing a new body would take time and is likely to cost more even if it is accompanied by a corresponding cut in the size of NRW. There would also be a risk of losing the existing expertise on protected landscapes within NRW if there were to be a period of uncertainty about the organisation's future responsibility for this area of work. Most importantly, the creation of a separate body dealing with landscape matters would be completely inconsistent with the integrated approach to natural resource management that the Government is trying to achieve. On balance, we believe that strengthening NRW would be a more effective way of providing national leadership and integrating a landscape scale approach than creating a new organisation.

6.4 Member training and induction

6.4.1 The training and support available to NPA members compares well to that provided generally in local authorities in Wales. NPA members are expected to attend appropriate training courses and other events and are encouraged to attend the course for new members organised by National Parks UK. All three NPAs have achieved the charter for member development and the Brecon Beacons NPA is one of only three authorities in Wales to have achieved the advanced charter for member development¹². However, the emphasis in the charter is on training being available to members rather than a requirement for them to undertake training. We believe that all NPA members should be required to attend training in National Park purposes and governance and planning issues of specific relevance to National Parks.

7 Considering both local and national needs

7.1 Background

7.1.1 As well as being home to local communities, National Parks are national assets, nationally funded and with a national and international 'customer base'. They have been designated for the

¹²<http://www.wlga.gov.uk/member-development-charter>

benefit and enjoyment of the nation. Those responsible for National Parks must consider the needs of local people and businesses with these aspects. This can only be done effectively if NPAs have the right balance of locally and nationally appointed members. For this reason, we believe that there should be no reduction in the number or proportion of nationally appointed NPA members.

7.1.2 One of the areas of responsibility in which it is particularly important, and particularly challenging, to address both local and national needs is land use planning and we discuss this issue in more detail below.

7.2 The case for NPAs retaining their planning powers

7.2.1 The land use planning system is an important delivery mechanism for protecting designated landscapes but planning encompasses a wide range of activities. It includes the management of development and use of land, the provision of land for jobs and housing, the conservation and enhancement of wildlife, the preservation and restoration of historical properties, the protection of cherished landscapes and archaeological assets and of the Welsh language and cultural heritage. In this regard NPAs have a good track record of delivering a high quality service which compares very favourably with other local planning authorities.

7.2.2 Many of the benefits which National Parks provide, including tourism and rural economic growth, would be lost if anything were to detract from the special qualities for which these areas are valued. The challenge is to ensure that the range of outcomes and benefits that protected landscapes provide is not compromised by insensitive change, unsympathetic land use or irresponsible development. This means that NPAs must retain their planning powers.

7.2.3 Measures included in the Planning (Wales) Bill create the potential for NPAs to lose their development management powers. This would give rise to a situation similar to that which operates in the Cairngorms National Park in Scotland where development management powers remain with the constituent local planning authorities, whilst the NPA has development planning and 'call-in' powers over some development management decisions. The Scottish Campaign for National Parks has highlighted that this system is confusing for all involved, including local residents, developers and public bodies, and has demonstrated no compensating advantages¹³. Another concern is that it is not clear that the joint planning boards would have any requirement to fulfil the statutory purposes of National Parks even if they were given responsibility for planning decisions in these areas.

7.2.4 In responding to both the Williams Commission's call for evidence in 2013 and consultations on proposed planning reforms we have made a strong case for NPAs to continue to have responsibility for planning in their area. We include a summary of our main arguments below and urge the review panel to recommend that NPAs retain their full planning powers.

7.2.5 NPAs should remain as local planning authorities with responsibility for both plan making and planning decisions in their areas because:

- By using their planning responsibilities to ensure successful delivery of the statutory purposes of National Parks, NPAs have delivered significant benefits to Wales, as demonstrated by research¹⁴ published in 2013.
- The Edwards Report in 1991 and several subsequent independent reviews, have found that having a separate authority is the most effective way of managing planning in National Parks. The conclusions of the Williams Commission also endorse this.

¹³<http://rewilding.org/rewildit/images/Unfinished-Business-a-national-parks-strategy-for-scotland.pdf>

¹⁴ Valuing Wales' National Parks, 2013, National Parks Wales

- There are demonstrable advantages of planning to the boundaries of protected landscapes, as demonstrated by Welsh Government research¹⁵ published in 2012.
- NPAs are best placed to consider both the national and local aspects of planning in National Parks, since they have both nationally and locally appointed members.

8 Value-for-money

8.1 Background

8.1.1 The Williams Commission report recommended that the Welsh Government and National Park Authorities should secure national leadership and co-ordination and the most effective use of resources and expertise and that the Government should consider doing so through a single authority whilst retaining the distinctive identities of the three Parks. We do not support the need for a single authority and below we discuss an alternative to this.

8.1.2 The Williams Commission also recommended that NPAs develop clear and consistent ways of collaborating with each other, and with local authorities, with Visit Wales and with Natural Resources Wales, on the ground, to avoid duplication and maximise the use of resources and scarce expertise. Our proposed alternative to a single authority would also address this recommendation.

8.2 Making most effective use of resources and expertise

8.2.1 There are clearly opportunities for the NPAs to work more effectively together and to reduce their corporate management costs. However, we believe that the most efficient way of doing this would be through the development of combined services to be delivered collectively for the three NPAs in specific areas of their work rather than by setting up a whole new single authority. This could be done through the development of service level agreements or similar and would be along similar lines to the tri-borough proposals¹⁶ in London in which three local authorities have developed an approach to shared management and commissioning of services aimed at reducing management costs and cutting overheads.

8.2.2 The main advantages of such an approach are:

- It is far more cost-effective than the creation of a completely new single authority which would involve significant start-up costs.
- It makes best use of limited resources through the sharing of expertise in specialist areas.
- There will be reduced costs arising from shared services.
- It allows the individual NPAs to retain local distinctiveness where appropriate and to continue to develop and maintain the good relationships with local partners which are essential to delivering the statutory purposes of National Parks.

8.2.3 Specific examples of areas of the NPAs' work where such an approach is likely to be most successful include:

- Dealing with major developments that fall below the threshold for consideration at a national level: It is relatively rare for NPAs to receive applications for major developments but when they do the additional complexities of dealing with such applications in the context of a protected landscape can mean that a significant proportion of the authority's planning

¹⁵ Delivery of planning services in statutory designated landscapes in Wales, 2012, Welsh Government

¹⁶ Tri-borough proposals report, 2011, Westminster City Council, the London Borough of Hammersmith and Fulham and the Royal Borough of Kensington and Chelsea (<http://www.rbkc.gov.uk/pdf/tri-borough%20proposals.pdf>)

resources need to be dedicated to one particular application. Having a shared service to deal with such applications would allow for a dedicated service from officers with the appropriate expertise and ensure that such applications could be dealt with as quickly as possible whilst still maintaining a high level of service for other applicants.

- Developing policy documents and related guidance: This would build on work already undertaken by the three NPAs to develop joint supplementary planning guidance, for example on sustainable development. Having a shared policy service would also offer the potential for dedicated resources in specialist areas such as emerging energy technologies which it may not be possible for each NPA to support individually. A shared policy service could also be responsible for reviewing the Local Development Plan and Management Plan for each of the NPAs, ensuring that the experience gained from a review of the plan for one area would directly benefit the other two areas.

8.2.4 A further advantage of this approach is that it offers significant potential for more effective collaboration on joint funding bids, building on the joint working that would already be taking place and taking advantage of the opportunities provided by having shared finance and procurement functions.

8.2.5 Where appropriate it would also be possible to extend this collaboration to constituent local authorities and/or to offer advice to neighbouring local authorities and AONBs who often need the same specialist skills required in National Parks. There are already a number of good examples of NPAs collaborating with other local authorities on areas such as minerals planning.

8.2.6 In addition there is the potential for greater sharing of resources between NPAs and neighbouring local authorities, particularly for back office functions, which do not necessarily require specialist National Park expertise. There are a number of areas of the NPAs' work such as finance, procurement, IT support, HR and legal services, where the issues to be dealt with and the processes used are likely to be very similar across all local authorities. In addition, these are all areas of work which are generally invisible to the public so there is no benefit to local distinctiveness and there is therefore significant potential for joint working in these areas.

8.2.7 Looking beyond Wales, it is also important to consider collaboration with the wider network of National Parks and indeed, all designated landscapes, in other parts of the UK. Whilst it is unlikely that the formal service level agreements proposed above would be appropriate in this context, there is clearly much that National Parks in all three countries can learn from each other.

8.3 Other potential opportunities to deliver efficiency savings

8.3.1 The review panel should also consider whether there are other potential opportunities to deliver efficiency savings. For example, there is an opportunity to transfer the management of Sites of Special Scientific Interest (SSSIs) and National Nature Reserves within the National Parks to the NPAs. This would ensure that any possible duplication of effort in wardening and monitoring of these sites is avoided and local management arrangements strengthened, as well as improving relationships with local communities and facilitating changes in management at a landscape scale. Such an arrangement has already been successfully piloted in Snowdonia National Park.

9. Key points and recommendations

- The National Parks of Wales have a key role to play in tackling strategic national challenges such as climate change, agricultural reform, a continuing decline in biodiversity and social and economic inequality.

- There are ways to ensure that the governance arrangements for National Park Authorities (NPAs) better reflect Welsh society in terms of gender, diversity and ethnicity. This should start by ensuring that under-presented groups have an opportunity to experience National Parks in the first place as demonstrated by initiatives such as CNP's Mosaic project.
- More could be done to improve the local accountability of NPAs including requiring local authorities to appoint members who represent wards which are at least partially within the Park and which reflect a geographical spread across the Park.
- We do not believe that direct elections should be introduced for NPA members as this would be complex and costly. Furthermore, there is a risk that members with strong anti-Park or single issue views might be elected and that NPAs will lose the range of expertise they need to perform their role effectively.
- More needs to be done to ensure that all relevant partners from all sectors are contributing to the delivery of National Park purposes. This should include further strengthening of the S62 duty and the development of a partnership approach to producing and delivering National Park Management Plans.
- If they are to fulfil their potential, Wales's National Parks need a body that champions protected landscapes at a national level. It is essential that Natural Resources Wales has the structures, resources and specialist expertise to ensure that it can adequately fulfil this role.
- All NPA members should be required to attend training in National Park purposes and governance and planning issues of specific relevance to National Parks.
- NPAs can only perform their role effectively if they have the right balance between local and national representation. For this reason, there should be no reduction in the number or proportion of nationally appointed NPA members.
- NPAs should remain as local planning authorities with responsibility for both plan making and planning decisions in their area. They have a good track record of delivering a high quality service and many of the benefits which National Parks provide would be lost if anything were to detract from the special qualities for which these areas are valued.
- There are opportunities for the three NPAs to work more effectively together by developing and delivering combined services for specific areas of their work such as specialist policy expertise. This would allow them to reduce their corporate management costs whilst retaining local distinctiveness and offers significant potential for more effective collaboration on joint funding bids.

10. Next Steps

10.1 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. As set out above, we would also be very pleased to help the panel facilitate engagement with one of those taking part in the pilot scheme to increase the diversity of representation on NPA boards.

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