

A response from Campaign for National Parks to Agriculture (Wales) White Paper March 2021

1. Campaign for National Parks is the independent national voice for the 13 National Parks in Wales and England. Our mission is to inspire everyone to enjoy and look after National Parks – the nation’s green treasures. We have been campaigning for over 80 years to ensure that our National Parks are beautiful, inspirational places that are relevant, valued and protected for all.
2. Campaign for National Parks brings together a wide variety of people and organisations to address issues affecting National Parks and take action to keep these beautiful places safe. We draw on a large pool of experts among our members, many of whom are actively involved in designated landscapes and their communities, across Wales and England and further afield. We also work closely with the Alliance for Welsh Designated Landscapes.
3. As the majority of land within the National Parks is farmed, the future of support for farmers and land managers will be critical if we are to protect and enhance these internationally recognised areas. We therefore welcome the opportunity to respond to this important consultation and have focused our comments on issues which particularly apply to designated landscapes as this is where we have the most relevant experience. We are members of Wales Environment Link and also support the wider issues covered in their response to this consultation.

Responses to selected consultation questions

Q4: What are your views on the proposed purposes for funding in support of the delivery of SLM? Are there other purposes which you feel should be considered? Please provide comments to support your view e.g. potential benefits and impacts.

4. We broadly support the proposed purposes for funding in support of the delivery of SLM as set out in the consultation document. However, there is one very important purpose missing and that is the maintenance and enhancement of the character, beauty and distinctive qualities of our landscapes. It is essential that the protection and enhancement of landscape character is one of the outcomes for which land managers are rewarded given the importance of landscape not only in terms of the environment but also the economy and culture of Wales.
5. This omission is particularly disappointing given that the importance of high-quality landscapes and the role that land management plays in shaping the landscape is highlighted in a number of places in the consultation document, for example:
 - ‘The results of centuries of farming and woodland management in Wales are clearly visible. Our scenic and often spectacular landscapes are one of the principal reasons why tourism thrives in many parts of Wales’ (para 1.17)
 - ‘...the proposals in this White Paper will result in some visible changes at a landscape scale in Wales. These changes will include increased woodland cover, an increase in arable and horticultural production together with increased farm and landscape-scale habitat resilience.’ (para 1.41)
 - ‘The cultural importance of landscapes and archaeological or historical features adds another layer of meaning to the definition and implementation of SLM. Although landscape change is inevitable over time through natural processes,

change brought about by SLM practices should not undermine the cultural value derived from individual features or the context provided by their surrounding landscape.’ (para 2.68)

6. The Welsh Government’s priorities for National Parks and Areas of Outstanding Natural Beauty (AONBs) are set out in *Valued and Resilient*¹ which was published in 2018. This document reinforces the importance of landscape more generally as well as emphasising the particular significance of Wales’ high quality designated landscapes: ‘The intrinsic link between people and place forms an important cornerstone of wellbeing in Wales. Landscapes in all their forms (rural, urban, coastal, marine, industrial, etc.) shape the feelings and identity of individuals, communities and the nation. Landscapes help people to understand their past. They inform the present and help express society’s collective hopes for the future. As visual expressions of identity the landscapes of Wales play a significant role in the process of creating a distinct nation. Some are considered iconic, represented in imagery used worldwide to convey messages about Wales’ collective identity.’ (p6-7)
7. The National Parks and AONBs are described as containing ‘some of the most beautiful, spectacular and dramatic areas of countryside in Wales. These are landscapes of national importance with designation conferring the highest status for the conservation of landscape.’ (p5) These extracts demonstrate the necessity of ensuring that any changes introduced in these areas provide strong support for the maintenance and enhancement of landscape character and natural beauty.
8. We recognise the need to evidence the connection between land management actions and the delivery of specified outcomes. Measuring significant improvements in the character, beauty, distinctive qualities and resilience of our rural and urban landscapes is challenging but LANDMAP provides a baseline for this work and, therefore, a starting point upon which priorities for improvements in landscape quality and character could be developed within the SLM.
9. There is also a reference in *Valued and Resilient* to the potential for National Park Authorities (NPAs) taking an active role in the administration of sustainable land management schemes but we note that this issue has not been addressed in the White Paper. We believe the NPAs could and should play an important role in identifying areas within their areas, and arguably around their boundaries, where single, multiple and competing benefits should be prioritised. This should be done through the National Park Management Plan so that this document sets the vision for the Park and then the framework for the SLM and the future delivery of public money.
10. It is also important to ensure that priorities are spatially targeted and that SLM delivers the most appropriate outcomes in the most appropriate locations to support maintenance or enhancement of environmental benefits on specific farms and also as part of a wider landscape scale approach. This will help to maximise the benefits delivered and hence the value for money.
11. In our report, *Raising the bar: improving nature in our National Parks*², we argued that National Park Management Plans should include spatial representations setting out which policies are a priority for different areas of the Parks. This would need to be zonal rather than specific lines on a map, but we believe this is important if policies, for example, around woodland creation are to provide maximum benefits because they should be implemented in a way that links up fragmented habitats and enhances the landscape. If this spatial

¹ <https://gov.wales/priorities-areas-outstanding-natural-beauty-and-national-parks-2018-valued-and-resilient>

² Campaign for National Parks (2018) [Raising the bar: improving nature in our National Parks](#)

approach is adopted for Management Plans then we believe they should play a role in identifying and directing priorities for the implementation of SLM in National Parks.

Q11: What are your views on the proposed amendments to forestry legislation? Please provide comments to support your view e.g. potential benefits and impacts.

12. We support the proposed amendments to forestry legislation, including the introduction of powers for Ministers to review and amend EIA thresholds. However, we are pleased to note that there are no current plans to change the EIA regulations and we would not support raising the thresholds for EIA. We also support the amendments in relation to felling licencing but we would like a reassurance that existing protections for ancient trees will be retained.

Q12: What are your views on how the Welsh Government can support landowners in Wales to benefit from carbon markets for planting trees?

13. Woodland and trees are a key part of a multi-functional landscape and have multiple benefits in terms of improving connectivity for wildlife, reducing flood risk and providing recreational opportunities as well as sequestering carbon. As such they make a vital contribution to achieving National Park purposes and we therefore welcome the Welsh Government's ambitions to expand woodland coverage and believe that there is potential to support landowners in Wales to benefit from carbon markets for planting trees. However, offsetting individuals' and businesses' carbon footprint by planting trees must be considered as part of a hierarchy of measures, which prioritises the avoidance and reduction of emissions. Any offsetting schemes should adhere to the Woodland Carbon Code³, which is 'the voluntary standard for UK woodland creation projects where claims are made about the carbon dioxide they sequester'.
14. There are significant opportunities for more trees and woodland in the National Parks. However, this must be delivered in a way which takes full consideration of the need for 'the right tree in the right place' and the fact that there are certain locations in National Parks where trees are not appropriate and would undermine their special qualities. Safeguarding ecological value also remains a priority and must be considered when choosing appropriate planting locations and species. This means care must be taken to ensure that other important habitats such as peatland and open grassland are protected and enhanced as tree planting in inappropriate locations could actually have a negative impact on biodiversity and carbon sequestration if it replaces such habitats, particularly where they are currently in good condition.

Other comments

15. We note that the White Paper proposes a number of additional powers in relation to common land but there is no question in relation to this and we would like to add some comments on this. Significant proportions of the Welsh National Parks are common land – for example it forms around 35% of the Brecons Beacon National Park. We are pleased that the White Paper recognises the role of common land in supporting agricultural production. However, common land also delivers a wide range of other benefits for landscape, wildlife, cultural heritage and public access and any changes introduced must not put these other benefits at risk.
16. We do not support the proposal in para 2.158 to revise the consenting regime on common land. There are specific issues that need to be considered before approving work on

³ <https://woodlandcarboncode.org.uk/> r

common land so it is entirely appropriate to retain a parallel consenting regime for these areas in addition to planning consent. This simply mirrors the consenting regime in other situations where specific features need to be taken into account such as listed buildings or maritime structures. Retaining the parallel consenting regime would also ensure that proper consideration is given to those works on common land which do not require planning permission, such as stock control fencing, and to the impact that any works may have on commoners' rights an issue which is not addressed through the planning system. Furthermore, given the national importance and complex status of commons it is important that such consents continue to be determined by Welsh Ministers, rather than by local planning authorities.

17. We welcome the proposal in para 2.159 to introduce new powers in relation to enforcement and would like to see this strengthened through the introduction of a duty on local authorities to take action against unlawful works on commons. It is currently too easy for the different parties involved to pass responsibility on to each other, so that too little action is taken.
18. We do not support the proposal to expand the functions and powers of Commons Councils set out in para 2.160. There are not yet any Commons Councils in place in Wales even though the power to create them was introduced in the Commons Act 2006, and they have been given very little priority to date. It would be much better to focus on prioritising and facilitating the introduction of Commons Councils, rather than trying to give them wider powers which could potentially undermine the public benefits of commons as set out above.

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