

6-7 Barnard Mews London SW11 1QU
Ffôn/Telephone: 020 7924 4077
Ffacs/Fax: 020 7924 5761
Ebst/Email: info@cnp.org.uk
Gwefan/Web: www.cnp.org.uk
Llywydd/President: Ben Fogle

Ms Carrie Moss
Living Wales Programme Team
Department for Environment and Sustainable Development
Welsh Government
Cathays Park
CF10 3NQ

2 May 2012

Dear Ms Moss

Natural Resources Wales – A consultation on the proposed arrangements for establishing and directing a new body for the management of Wales’ natural resources

Introduction

The Campaign for National Parks (CNP) is the charity that campaigns to protect and promote National Parks in England and Wales as beautiful and inspirational places enjoyed and valued by all. It has been in existence for over 75 years. CNP’s work in Wales is informed by a Welsh Advisory Committee, which includes representatives from each of the National Park Societies and other bodies such as CPRW and the National Association of AONBs. The National Park Authorities in Wales and National Parks Wales have observer status.

National Parks are the finest landscapes which have been granted the highest level of protection. The statutory purposes of National Parks are:

- To conserve and enhance the natural beauty, wildlife and cultural heritage of the National Parks
- To promote opportunities for the public understanding and enjoyment of the special qualities of the National Parks

In those cases where conflict exists between the two purposes and reconciliation proves impossible, the first purpose should take precedence.

In Wales, National Parks comprise about 20% of the country’s land mass and therefore have a vital role to play in sustainable development. They already contribute significantly to the well-being of the nation, 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.

National Parks are inspiring spaces for people to enjoy and improve their health and well-being, whilst making a significant contribution to the economy of Wales through farming, tourism and other related businesses. CNP believes that the nationally designated landscapes of Wales should be maintained as distinctive and unique tracts of countryside, which are also adaptable and resilient to future pressures such as climate change.

CNP is pleased to have this opportunity to respond to the Welsh Government's consultation on a new body for the management of Wales's natural resources. We support the need to move to a decision making framework that is set within a context of sustainable development and delivered through institutional and administrative arrangements that are as simple as possible. We, therefore, support the principle of establishing a Single Environmental organisation and its proposed role in guiding and overseeing the management of the Welsh environment, provided that this takes proper account of all the important aspects of natural resources, including the use of land and sea for recreation and the natural beauty and cultural heritage which National Parks and Areas of Outstanding Natural Beauty exist to protect. However, we have a number of concerns about the detail of what is proposed, which can be summarised as follows:

1. The need for the new body to play a strong role in promoting the duty for relevant public authorities to have regard to the statutory purposes of National Parks.
2. The lack of reference to the new body's role in protecting, promoting and championing landscapes deemed to be of national importance and in promoting opportunities for their enjoyment.
3. The lack of reference to seascapes as well as landscapes.
4. The emphasis on the use, rather than the protection and responsible stewardship, of Wales's natural resources.
5. The importance of the new body playing a key role in encouraging under-represented and disadvantaged groups of people to gain greater access and understanding of the natural environment and the benefits that can bring.
6. There is insufficient consideration as to how the new body will achieve its objectives at local level and how it will interact with existing bodies and established mechanisms.
7. The potentially negative effects of this reorganisation on essential funding for the third sector.

Consideration also needs to be given as to who will monitor and scrutinise policy on the natural environment. If this is not to be in the remit of the new body, then who will be responsible for this?

The following sections provide further detail on each of the points set out above.

1. Promoting the duty to have regard to National Park statutory purposes

Section 11A of the 1949 National Parks and Access to the Countryside Act places a duty on relevant authorities to have regard to National Park statutory purposes while carrying out their activities but there is often a low awareness of this duty amongst the relevant authorities and, as a result, National Park purposes are often 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. CNP would like to see the new body play a strong leadership role in ensuring that the duty is more widely applied and understood.

2. Lack of reference to landscapes

National Parks make a vital contribution to sustainable development in Wales and have a key role to play in delivering the ecosystem approach to the management of natural resources. They also contain Wales' finest landscapes. Landscapes are resources in their own right and represent a diverse combination of natural features and forms, spaces, habitats and experiences which are expressed through a unique legacy of inherited human traditions, skills and endeavour. We are, therefore, very concerned at the lack of any direct reference to the role of the new body in protecting, promoting and championing landscapes deemed to be of national importance and in promoting opportunities for their enjoyment. Examples of this include:

- The list of functions for the new body in Table 1 includes "conservation, restoration and enhancement of the landscapes and seascapes of Wales" but the examples given refer only to the new body's role with regard to designating National Parks (and Areas of Outstanding Natural Beauty).
- There is no direct reference to the new body assuming the existing powers of CCW to designate and undertake actions to protect landscapes deemed to be of national importance. This role should be explicitly stated as a proposed function of the new body.
- The lack of any proper recognition that promoting opportunities for the public understanding and enjoyment of the special qualities of the National Parks of Wales will be an important role of the new body.
- There is very little reference to the term 'landscape' throughout the document and it is not mentioned at all in the proposed list of strategic outcomes for the organisation.

3. Lack of reference to seascapes

Protected seascapes are another very important feature of the National Parks in Wales, having a key role to play in the coastal environment of both Pembrokeshire Coast and Snowdonia. It is vital that the seascapes associated with these areas are protected. To address both this, and our concerns about the lack of reference to

landscapes, we suggest amending the aim of the Single Environmental Body (SEB) as set out in Section 4.4 of the consultation document to the following:

‘To protect, enhance and develop the responsible stewardship of Wales’ environment, natural resources and all its landscapes both on land and at sea’

The words ‘people and economy of Wales’ which was included in the original version are covered anyway in the reference to social and economic well-being in the first strategic outcome so we do not believe that anything will be lost by removing those words from the aim.

If this is not possible then at the very least an additional strategic outcome should be included to cover the conservation, enhancement and enjoyment of landscapes and seascapes, especially those that are protected nationally.

4. Too much focus on the use of natural resources

CNP wants to ensure that the protection and value of the National Parks are not eroded in pursuit of short term economic and societal goals. We believe that the proposals for the new body focus too much on its role with regard to the *use* of Wales’s natural resources as opposed to *their protection and responsible stewardship*. We are concerned that this will result in its work being driven primarily by the provision of services arising from the use of landscapes and seascapes, rather than an approach based on sustainable principles.

5. Encouraging access and understanding

We note that one of the functions of the new body is to improve and increase access to, and use of, the environment for outdoor recreation but there is no specific reference to increasing access by groups currently under-represented among visitors to the National Parks. CNP has recently obtained funding from the Big Lottery Funds’ People and Places programme to run a three-year new audience engagement project, covering all three National Parks in Wales. This will be based on the successful CNP Mosaic model of training influential urban community leaders to become Champions and promote the National Park to others in their community. It will target ethnic minority communities in Newport, Cardiff, Swansea, Bangor and Wrexham and aims to introduce thousands of new people to the physical and mental health benefits that National Parks offer.

We are keen to ensure that there is an opportunity for other similar initiatives in Wales in future. The new body should provide enabling mechanisms and support for projects such as this to ensure that disadvantaged groups of people can gain greater access and understanding of the natural environment and the benefits this can bring.

6. Interaction with existing bodies

We welcome the inclusion of increasing public involvement as one of the functions of the new body. However, to be meaningful public involvement often has to be at a local level, particularly when considering and resolving issues of natural resource management. The new body will need to have active and continuous engagement with all sectors of Welsh society including communities, voluntary organisations, community and local councils, public bodies, private sector businesses and regulatory bodies.

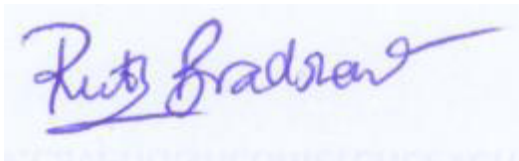
We also welcome the reference to “new and innovative approaches and partnerships for delivery, including work with third sector partners and local authorities” (page 4) but we are concerned that there does not seem to be any recognition of the need to take maximum advantage of existing partnerships and arrangements, such as the Management Plans, which each National Park Authority already prepares. We would like to see a clear commitment that the new body will, wherever possible, seek to achieve its objectives through National Park Authorities and local authorities.

7. Funding for the third sector

The Countryside Council for Wales is currently a major source of funding for the third sector which plays a vital role in delivering environmental and sustainability objectives in Wales. The consultation document recognises the potential contribution of the third sector, especially in developing new and innovative approaches to delivery of natural resource management. However, we are concerned that the creation of the new body and the need to find efficiency savings could have a negative impact on the funding and support available for the third sector. We would like a reassurance that the new body will give sufficient priority to the viability of relevant third sector bodies and that there will be no overall reduction in the scale of funding available to it.

CNP trusts that these comments will be helpful in developing the proposals for a Single Environmental body in Wales. We would be pleased to continue working with the Welsh Government and other partners to ensure the successful establishment of a single body which can effectively maintain and enhance all of Wales’s natural resources.

Yours sincerely



Ruth Bradshaw
Research and Policy Officer

Tel: 020 7924 4077 ext. 222
Email: ruthb@cnp.org.uk