

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

2 October 2012

Dear Ms Moss

Natural Resources Body for Wales (additional consultation)

Introduction

1. The Campaign for National Parks is the independent national voice for the 13 National Parks in England and Wales. Our mission is to inspire everyone to enjoy and look after National Parks – the nation's green treasures. CNP's work in Wales is informed by a Welsh Advisory Committee, CNP Cymru, 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.
2. National Parks are our finest landscapes with the highest level of protection. Their statutory purposes are to conserve and enhance wildlife, cultural heritage and natural beauty, and to promote opportunities for public enjoyment and understanding of their special qualities. 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.
3. In Wales, National Parks comprise about 20% of the country's land mass and contribute significantly to the well-being of the nation, by providing safe, attractive, healthy places for active travel and recreation. They also play a vital role in sustainable development through protection of the landscape, wildlife and key environmental resources and services, like water provision and carbon storage in peat soils and forests, which can mitigate the effects of climate change. As well as being inspiring places for people to enjoy and improve their health and well-being, National Parks make a significant contribution to the economy through tourism, farming, and other related businesses.
4. 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.

Our comments

5. CNP is pleased to have this further opportunity to help shape the duties and responsibilities of the Natural Resources Body for Wales. As set out in our response to the initial consultation on the arrangements for this new body which closed in May 2012, we 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.
6. We recognise that the Welsh Government has had a great deal of work to do in a short space of time to prepare for the new body but we are concerned that certain aspects of the existing bodies' responsibilities are in danger of being overlooked. We are particularly concerned that issues relating to landscape management and protection have been significantly under-represented in the proposed role, functions and scope of the work of the new body. Similarly, there is no mention of seascapes.
7. The Welsh Landscape Partnership (WLP) has submitted a detailed response focused on ensuring that the new body's duties and functions are designed in such a way as to protect the intrinsic character of all Wales's landscapes and promotes their responsible use. We fully support both this response and the response submitted by Wales Environment Link (WEL). We support the changes that both WLP and WEL are proposing but would also like to raise a number of other issues of specific concern.
8. We believe that the new body should:
 - Play a strong role in promoting the duty for relevant public authorities to have regard to the statutory purposes of National Parks.
 - Protect, promote and champion landscapes and seascapes deemed to be of national importance and promote opportunities for their enjoyment.
 - Play a key role in encouraging under-represented and disadvantaged groups of people to gain greater access to, and understanding of, the natural environment.
 - Work in partnership with the third sector to achieve its aims.
 - Place more emphasis on footpaths as part of its recreation and public access duties.

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

Duty to have regard to National Park statutory purposes

10. 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. We would like to see the new body play a strong leadership role in ensuring that the duty is more widely applied and understood. In addition, it is essential that the new body takes full account of the statutory purposes of National Parks in its own decision-making. The wording of clause (c) in box 2 needs to be amended to reflect this.

Landscapes and seascapes

11. As set out above, we are concerned that responsibilities relating to the landscape have been overlooked in the proposed duties and responsibilities of the new body. We would like to see the new body play a strong role in promoting, protecting and championing Wales's protected landscapes and seascapes but we are concerned that this will not happen under the current proposals. There is very little mention of landscapes in the consultation document and no mention of seascapes.
12. We are particularly concerned that there is no direct reference to the new body assuming the existing powers of the Countryside Council for Wales (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.
13. We would also urge you to make the changes set out in the response from WLP to ensure the new body has the duties and responsibilities needed to continue to protect and promote Wales's landscapes.

Encouraging access and understanding

14. We welcome the proposal to give the new body public access and recreation duties but would like to see a specific reference to increasing access by groups currently under-represented among visitors to the countryside. The Campaign for National Parks manages the Mosaic engagement programme which has successfully recruited and trained hundreds of volunteer community champions to introduce thousands of people from urban areas to the physical and mental health benefits of National Parks over the last 10 years. We have targeted people from disadvantaged communities which are under-represented in National Parks and are now working with the three NPAs in Wales on a new three year project which focuses on ethnic minority communities in Newport, Cardiff, Swansea, Bangor and Wrexham.
15. 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.

Working with the third sector

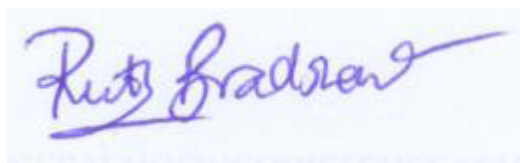
16. The Countryside Council for Wales is currently a major source of funding for the third sector which plays a vital role in delivering environmental and sustainability objectives in Wales. We are concerned that the creation of the new body and the need to find efficiency savings could have a negative 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.

Public access and recreation duties

17. Footpaths are essential both for public access and for recreation and should be given a high profile in the duties of the new body. The present proposal for sub-paragraph 3(3)(d) of the second order begins its list with picnic places and ends it with footpaths as an apparent afterthought. This sub-paragraph needs to be divided into two sub-paragraphs, one for “footpaths and routes of nature study” and the other for “picnic places, places for enjoying views and parking places”.

18. We trust that these comments will be helpful in developing the proposals for a Natural Resources Body for 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



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