

REPORT OF CHIEF EXECUTIVE

SUBJECT: TO AGREE A RESPONSE TO THE REVIEW OF DESIGNATED LANDSCAPES IN WALES

Purpose of Report

To provide Members with an opportunity to agree the National Parks Wales response to Part 1 of the Review of Designated Landscapes in Wales.

Introduction/Background

The Welsh Government recently invited the Authority to submit evidence to inform the Review of Designated Landscapes (Annex A). Officers of this Authority have worked with the other two Welsh National Park Authorities to draft a joint response (Annex B).

In view of the fact that the deadline for submission of responses is the 5th November 2014, the same day as the Authority meeting, there will be little opportunity to make any significant changes to the document on that day. It would, therefore, be advantageous if Members could raise any serious concerns, or propose any changes to the text, before the 5th November. Any changes will be presented to Members at the meeting for approval.

RECOMMENDATION:

Members agree the draft response to the Review of Designated Landscapes.

*Author: Tegryn Jones, Chief Executive
Consultees: PCNPA Members and Staff*

31 October 2014

The Review of Designated Landscapes in Wales

The Welsh Government has commissioned an Independent Panel to conduct a review of designated landscapes in Wales (National Parks and Areas of Outstanding Natural Beauty). I am very pleased and honoured to have been appointed Chair of this Panel along with members John Lloyd Jones and Dr Ruth Williams. The specific terms of reference; preamble and stage one questions are enclosed.

The review will take place during the rest of 2014 and throughout 2015 and will be in two stages. In conducting its work, and in reporting its recommendations, it will be particularly important to gather a variety of types of evidence from both stakeholders and members of the public. We are planning, from the outset, a set of evidence gathering activities involving written submissions, face-to-face meetings, public workshops and the gathering of evidence via our website.

This letter is specifically inviting you/your organisation to initially submit written evidence to the review panel **by Wednesday 5th November 2014** regarding the first stage of its work where it will address: (i) the purposes of designated landscapes, and (ii) the merits of classifying Wales' designated landscapes under one type of designation. **We will then conduct some focussed evidence gathering sessions to which you/your organisation may be invited over the course of the 20th and 21st November 2014.** Public engagement workshops will also be held within or within the reach of the designated landscapes during the week commencing the 10th November 2014. After the first stage has been completed the review will turn its attention to the future governance and management arrangements of designated landscapes in Wales.

I, and the panel, wanted to initially convey to you how we see the importance, opportunity and timeliness of this review in ensuring that our designated landscapes in Wales are equipped to meet current and future challenges, and to take forward the sustainability agenda. Our protected landscapes have served the public well over at least two generations, but as we are all aware they now face new and indeed more complex challenges; but also opportunities. We hope therefore that the review will be an opportunity to create a realistic vision and governance framework for Wales which will provide the basis for them to continue to deliver to the needs of our present and future generations.

Yours sincerely

A handwritten signature in black ink, appearing to read 'T Marsden', with a horizontal line underneath the name.

Professor Terry Marsden.
Chair, Review of Designated Landscapes in Wales

Please submit your comments by 5th November 2014, in any of the following ways:

Post:

The Review of Designated Landscapes in Wales
Third Floor, South Core, C04
Welsh Government, Cathays Park
Cardiff CF10 3NQ

Email:

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The Review of Designated Landscapes in Wales

Remit and Terms of Reference

Welsh Ministers want to ensure that designated landscapes are equipped to meet current and future challenges, and they become internationally recognised exemplars for sustainability. They have commissioned this review to consider whether the current arrangements will deliver these objectives and, if not, what changes should be made in order to achieve them. The review will engage with the public and designated landscape stakeholders in order to collate, examine and assess evidence concerning the designation, purposes, aims and governance of designated landscapes in Wales.

This review will be split into two stages. Stage one will examine the designations themselves and stage two will follow, examining the governance arrangements of designated landscapes in light of the first stage recommendations to the Welsh Ministers.

Stage One

- the merits of classifying Wales' designated landscapes under one type of designation.
- the purposes of these designated landscapes.

Stage Two

- the governance and management arrangements of these designated landscapes.
- how any future governing body/bodies would best promote collaboration and joint working while avoiding duplication
- how any future governing body would best reinforce local accountability and decision making.

In the medium to long term, the new arrangements must enable any future body/bodies that govern our designated landscapes to further develop and enhance their strategic, policy making and operational delivery abilities such that they will

- i. Deliver on designated landscape purposes.
- ii. Ensure the special qualities of designated landscape are protected.
- iii. Maximise the potential of these areas.
- iv. Support the application of Natural Resource Management.
- v. Be exemplars particularly in landscape management and sustainability.
- vi. Develop clear and consistent ways of collaborating
- vii. Secure national leadership and yield the most effective use of resources.
- viii. Avoid duplication and maximise the use of scarce expertise.
- ix. Reinforce local accountability and decision making.

Welsh Ministers have not reached a view on whether National Park Authorities should retain planning functions. That will be determined separately. Stage 2 of the review will take that into account once a decision has been reached.

Review of Designated Landscapes in Wales

Stage One

Preamble

Two types of designated landscape cover approximately a quarter of Wales. National Parks cover approximately twenty percent and Areas of Outstanding Natural Beauty (AONBs) cover the remaining five percent. Both designations originate from the National Parks and Access to the Countryside Act 1949.

National Parks have two statutory purposes:

- To conserve and enhance the natural beauty, wildlife and cultural heritage of the area,
- To promote opportunities for the public understanding and enjoyment of the area's special qualities.

Areas of Outstanding Natural Beauty have a single statutory purpose:

- To conserve and enhance the natural beauty of the area.

Due to the number of statutory purposes, geographical size and governance arrangements National Parks and AONBs can be described as occupying different "tiers" of a designated landscape hierarchy.

In terms of their landscape and scenic beauty, both National Parks and AONBs are of equal importance. Planning Policy Wales states (5.3.6) "*National Parks and AONBs are of equal status in terms of landscape and scenic beauty.*"

The legal duty on "relevant authorities" to have regard for the purposes of designated landscapes in undertaking their work is identical – section 62(2) of the Environment Act 1995 for National Parks and section 85(1) of the Countryside and Rights of Way Act 2000 in respect of AONBs.

National Parks and AONBs attract many millions of visitors each year to Wales and face similar environmental, economic and social pressures.

The designated landscape also meet internationally recognised standards. The International Union for the Conservation of Nature (IUCN) recognises the two types of designated landscapes as Category 5 protected areas.

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:

Goal	Description
<i>A prosperous Wales.</i>	An innovative and productive, low carbon emission, economy that makes more efficient and proportionate use of resources; and which generates wealth and provides employment opportunities for a skilled and well-educated population.
<i>A resilient Wales.</i>	A biodiverse natural environment with healthy functioning ecosystems that support social, economic and ecological resilience and the capacity to adapt to change.
<i>A healthier Wales.</i>	A society in which people's physical and mental well-being is maximised and in which choices and behaviours that benefit future health are understood.
<i>A more equal Wales.</i>	A society that enables people to fulfil their potential no matter what their background or circumstances.
<i>A Wales of cohesive communities.</i>	Attractive, viable, safe and well connected communities.
<i>A Wales of vibrant culture and thriving Welsh Language.</i>	A society that promotes and protects culture, heritage and the Welsh language, and which encourages people to participate in the arts, and sports and recreation.

Sixty five years has passed since the legislation creating the original designations received royal assent. Welsh Ministers want to ensure that our designated landscapes are resilient enough to meet current and future challenges while retaining their distinctiveness and becoming internationally recognised exemplars for sustainability.

The Welsh Government has commissioned this review to consider whether the current arrangements will deliver these outcomes and, if not, what changes should be made in order to achieve them. The review will engage with the public and designated landscape stakeholders in order to examine, collate and assess evidence concerning the designation, purposes, aims and governance of designated landscapes in Wales.

The review will be split into two stages. Stage one will examine the possible alignment and purposes of designations while stage two will examine the governance

arrangements of designated landscapes in Wales. The lines of questioning for stage two will be developed in light of the first stage recommendations to Welsh Ministers.

Questions for Stage One

<p>1</p>	<p>Are designated landscapes equipped to meet the current and future needs of Wales?</p>
	<p><i>In responding to this question you may want to think about and cover:</i></p> <p>The strengths and weaknesses of the existing system of designated landscape statutory purposes and statutory duties.</p> <p>Potential challenges and opportunities facing Wales’ designated landscapes.</p> <p>Whether the current statutory purposes of designated landscapes and statutory duties on management bodies are capable of addressing the present and future challenges facing them.</p> <p>Whether new or revised purposes are necessary to improve the innovative potential of designated landscapes.</p> <p>Examples of innovative statutory/legislative purposes and/or aims of designated landscapes outside Wales.</p>
<p>2</p>	<p>Should there be a single designation of protected landscape in Wales?</p>
	<p><i>In responding to this question you may want to think about and cover:</i></p> <p>The specific merits, advantages and disadvantages in the current “two tier” system of statutory landscape designation since in certain respects the two existing designations are virtually indistinguishable.</p> <p>Whether a single designation could optimise the use of resources and scarce expertise; contribute to greater efficiencies and improve collaboration and coordination across Wales whilst maintaining the protection currently afforded to these landscapes.</p> <p>The implications for national and international standards concerning landscape and conservation of a single designation.</p> <p>The experience you or your organisation has had with one or both designations.</p> <p>Examples of designation alignment outside Wales and lessons to be learned.</p>

The Review of Designated Landscapes in Wales – Stage One Response by National Parks Wales

5 November 2014

Executive Summary

ES1 The three National Parks in Wales occupy a very special place in our nation's history and culture. We cover 20% of Wales and protect precious landscapes, heritage and wildlife, enjoyed by millions of visitors each year. We also provide a home and workplace for thousands of people. Unlike some of our international counterparts, we are not wilderness areas and are formed by and valued because of the interaction between people and the landscape.

ES2 Over the last sixty years, we have delivered a wide range of benefits for the people of Wales and beyond, the pace of which has accelerated since the introduction of special authorities to look after these areas twenty years ago.

ES3 But, despite this success, we have not stood still. Our purposes have evolved to reflect the needs of society, and we have helped to put Wales on the international map through our work. We are a significant part of the Welsh economy and our environments directly support nearly 13,000 jobs across Wales.

ES4 The benefits that we provide cut across many different policy areas, including on those which are a challenge for society as a whole such as poverty alleviation and tackling inequality.

ES5 We are committed to playing a full part in helping the Welsh Government to deliver its long term goals on sustainable development, integrated natural resource management and securing the well-being of current and future generations.

ES6 We believe that our purposes need to change to help us to play a fuller part in meeting current and future challenges and delivering long-term outcomes, with new purposes needed on well-being and natural resources. The power of our landscapes to boost well-being was recognised at the time of our designation. We believe that the time has come for our role on improving the health of the nation's people to be expanded.

ES7 We have embedded sustainable development as our central operating principle, and have trailblazed sustainable development initiatives for a number of years. We are expert at integrating economic, social and environmental objectives and believe that our skills and experience in this could be of benefit to others.

ES8 Our working practices and culture put people at the heart of our work and we involve people in all aspects of our operations, including planning, delivery and scrutiny. We operate transparently and efficiently, share best practice and are models of good governance in Wales. Whilst we have an excellent track record, we are receptive to new ways of working that will improve our ability to deliver effectively and efficiently.

ES9 In delivering against our new responsibilities, our planning function will remain a critical tool and we are proud of the progress that we have made in becoming three of the best performing planning authorities in Wales.

ES10 We consider that the proposals set out in this response will help us to be more reflective of the needs of Welsh society and ensure that we remain fit for purpose in and relevant to the needs of 21st century Wales.

Recommendations

In this response, we recommend the following key changes to the legislative and policy framework and institutional arrangements underpinning National Parks and NPAs.

R1 The duty to have regard to National Park purposes should be revised. We suggest linking it to the National Park Management Plan and requiring relevant authorities to report annually on how they have supported the delivery of the Plan. Plans should be laid before the National Assembly for Wales on a five year cycle, allowing for public debate and scrutiny.

R2 Stronger national leadership should be provided by Natural Resources Wales, including through Board-level leadership and ownership of a vision and statement of general policy for protected landscapes. There should be explicit recognition within the Environment Bill of Natural Resources Wales' responsibilities for protected landscapes. The Welsh Government should outline its vision for protected landscapes.

R3 NPAs should be given an explicit duty in respect of well-being plans. The role of the National Park Management Plan should be expanded to encompass well-being, becoming the de facto well-being plan for the National Park. NPAs should become full members of Public Service Boards in order to facilitate this enhanced role.

R4 As part of moves towards greater integration in reporting, NPAs should be given responsibility for including Local Natural Resource Plans for the National Parks in their National Park Management Plans. This is a logical extension of the Plans, which have delivered integrated natural resource management over the last two decades.

R5 National Park purposes have evolved over sixty years to reflect society's needs and priorities. There is an expectation amongst our communities and key partners that further change is now necessary. The model of Scottish National Parks offers an evolution of the current system of purposes and duty that we believe would be appropriate in the Welsh context, albeit with some modifications.

R6 We recommend that the two existing statutory purposes are updated and expanded, and that two additional purposes on promoting sustainable economic well-being and natural resource management are introduced. The legislation should also include an extended conflict resolution mechanism.

R7 We believe that it is timely to explore whether the added value that a marine and coastal National Park could bring for conservation, recreation and sustainable development justifies designation. As a first step, the Welsh Government should amend the legislation to allow for their creation in principle, subject to areas meeting the designation criteria.

R8 NPAs should assume statutory responsibility for the public rights of way network and there should be explicit recognition of NPAs' ability to act as hubs for the delivery of Welsh Government priorities on sustainable development and natural resource management, including in areas without a recognised management plan or delivery focus.

R9 The time and cost to create a new designation and undertake the de-designation of the existing National Parks and AONBs would be substantial and in our view it would not be in the public interest to proceed with such an exercise. It would also risk compromising the well-established brand value of National Parks, the economic benefits of which are felt well beyond National Park boundaries.

R10 NPAs and AONB management organisations already undertake a number of collaborative activities which could be further developed. These include shared or joint services and a unified approach to the delivery of shared outcomes on conservation, well-being and natural resource management.

1. Introduction

1.1 National Parks Wales welcomes the opportunity to respond to Stage 1 of the Review of Designated Landscapes in Wales. In this response we have addressed all of the matters included within the terms of reference of the review and would be pleased to provide more details on any of the enclosed.

1.2 There are three National Parks in Wales covering an area of 4,122 sq. km, which represents approximately 20% of the land area of Wales. Snowdonia was designated in 1951, the Pembrokeshire Coast in 1952 and the Brecon Beacons in 1957.

1.3 Wales' National Parks are 'living places' with a residential population of over 80,000 people. Nearly 30,000 people are employed within the Parks' boundaries. The Parks receive 12 million visitors each year who spend an estimated £1bn on goods and services. Nearly three quarters of the population of Wales make a visit to a National Park each year.

1.4 Each National Park is managed by a National Park Authority (NPA). NPAs have a legal basis and are charged with the achievement of National Park statutory purposes¹ which are: conserving and enhancing the area's natural beauty, wildlife and cultural heritage, and promoting opportunities for the understanding and enjoyment of its special qualities by the public. They have a duty, in pursuing their statutory purposes, to seek to foster the economic and social well-being of local communities within their National Park, in co-operation with bodies whose functions include the promotion of economic or social development.

1.5 The three Welsh NPAs work in partnership as National Parks Wales, which provides NPAs with the means of identifying issues of joint interest and agreeing outputs. Information and experiences are shared between NPAs.

2.0 Historical context for the independent review

2.1 The Welsh National Parks have been the subject of several independent and government reviews since they were first established in the 1950s, with each review assessing current arrangements and recommending improvements to the underpinning legislative and policy framework and management systems.

2.2 Between 1971 and 1974, the National Parks Policy Review Committee reviewed National Parks in England and Wales. This was chaired by Lord Sandford and was known as the Sandford Review. The review established the Sandford Principle, an important management tool to reconcile public enjoyment with conservation in National Parks.

2.3 In the early 1990s, an independent panel chaired by Cardiff University Professor Ron Edwards reviewed the history and operation of the Parks in England and Wales over the past 40 years and set out a vision for their future, culminating in a report known as the Edwards report². One of the review's principal recommendations was for the creation of free-standing, independent National Park Authorities as the review found that local government management was not delivering National Park purposes effectively.

2.4 The principle of and rationale for free-standing, independent authorities was accepted by the Government, which agreed that a county council, with its wider remit, would not be able to give the same focus and resources to a National Park that an NPA would.

2.5 Provision was subsequently made for the establishment of free-standing, independent authorities through the Environment Act 1995. This received cross-party support in both Houses of Parliament.

¹ s5(1) of the 1949 National Parks and Access to the Countryside Act, updated by the 1995 Environment Act

² Report of the National Parks Review Panel, the Countryside Commission (1991)

2.6 The NPAs in Wales were set up in 1996. Initially, Welsh Office Circular 13/99 provided strategic guidance to them on the practical implementation of their core functions. In 2004, the Welsh Government published the results of an independent review of the National Parks. In 2007, the Welsh Government produced a policy statement on National Parks and NPAs³ and has recently consulted on a replacement policy statement⁴.

2.7 In 2013, the Commission on Public Service Governance and Delivery⁵ conducted an examination of the way that public services are governed and delivered in Wales, and considered how they might be improved. Following extensive inquiry and evidence gathering the Commission reported in January 2014.

2.8 The Commission recognised the rationale for and importance of NPAs operating independently and concluded that the distinctive focus of NPAs on conserving and promoting sustainable access to National Parks would be at risk if their functions were transferred to local authorities (paragraph 2.60). Instead, the Commission recommended that NPAs build on their existing collaborative efforts and develop clear and consistent ways of collaborating with each other, and with local authorities and other bodies such as Natural Resources Wales, to avoid duplication and maximise the use of resources and scarce expertise. We will present detailed evidence on this recommendation in our response to Stage 2 of the Review, but do cover some aspects of it in this response, particularly with regards to Question 2.

2.9 Each of these reviews reaffirmed the importance and benefits of Wales' National Parks, their significance to a modern day Wales and the continuing importance of independent NPAs to manage National Parks.

2.10 In addition to their national importance, National Parks help to put Wales on the map and are part of a worldwide movement of international significance. NPAs engage in skill sharing and knowledge transfer programmes with their international counterparts e.g. Snowdonia NPA has trained Norwegian Park Rangers on footpath restoration. There are many examples of where National Parks have helped Wales to achieve international recognition e.g. the Pembrokeshire Coast was voted the second best coastline in the World (and the best in Europe) for sustainable tourism management⁶.

3.0 The role of protected landscapes within wider landscape policy

3.1 National Parks were created to protect the most beautiful and imposing landscapes in the UK and to facilitate their enjoyment by the public. Following a long campaign by people for greater access to the countryside, National Parks were set up as part of the national post-war reconstruction that took place in the 1950s. They were created alongside other major public services such as the National Health Service. Unlike some of their international counterparts, they are not wilderness areas and are formed by and valued because of the interaction between people and the landscape.

3.2 The European Landscape Convention⁷ provides an international framework for promoting landscape protection, management and planning. The Convention offers a people-centred and forward-looking way to reconcile environmental management with the socio-economic challenges of the 21st century and to help people and communities to re-connect with place.

³ Policy Statement for National Parks and National Park Authorities, Welsh Government (March, 2007)

<http://wales.gov.uk/about/cabinet/cabinetstatements/2007/1321477/?lang=en>

⁴ Consultation on the draft Policy Statement for Protected Landscapes in Wales, Welsh Government (June 2013)

<http://wales.gov.uk/consultations/cultureandsport/landscape/?lang=en>

⁵ Commission on Public Service Governance and Delivery, Full Report (January 2014)

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

⁶ National Geographic Magazine poll of 340 travel journalists, 2010

⁷ <http://www.landscapeinstitute.co.uk/policy/EuropeanLandscapeConvention.php>

3.3 It takes a democratic rather than an elitist view of landscape and it acknowledges the economic, social and cultural, as well as the environmental, importance of landscape. It stresses that landscape is an important part of people's quality of life everywhere, and that people have an interest in what happens to the landscape and in the development of landscape policies. The protection, management and planning of landscape entails rights and responsibilities as well as opportunities for everyone.

3.4 Within this context, protected landscapes such as National Parks have a particularly important role to play. The benefits and services that protected landscapes provide to society are immense and will increase in value over time. Protected landscapes are the engines of the rural economy, providing enduring income and jobs, as we highlight in Section A8 of this response. These benefits beyond boundaries are an integral part of the value of protected landscapes. They also occur through the NPAs' application of their Sustainable Development Funds, which support sustainable development projects within or in close proximity to the Parks. For every £1 granted by the fund, approximately £5 is attracted to the National Parks.

3.5 All of this enables NPAs to make important contributions to a number of Welsh Government policy agendas and long-term outcomes, as we set out in Section B3.5 of this response.

3.6 **We consider that there is potential for Wales' eight protected landscapes to work together more closely so that there is a unified approach to the delivery of shared outcomes on conservation, well-being and natural resource management.** This could be achieved through a unified management plan with high level national indicators or through common reporting on shared high level outcomes. We will say more about this in our response to Question 2.

4.0 Vision of Sustainability

4.1 The NPAs are leading lights on sustainable development and are well placed to deliver the outcomes of the Well-being of Future Generations (Wales) Bill. The Welsh Government regards the National Parks as exemplars and pioneers of sustainable development⁸ and the NPAs operate successful Sustainable Development Funds. Highlighting the importance of this role within the Review will assist NPAs in their work to embed sustainable development as their central organising principle.

4.2 The NPAs use their partnerships and Sustainable Development Funds to support and foster innovation e.g. Pembrokeshire Coast NPA's creation of the nationally acclaimed coastal land management scheme 'Conserving the Coastal Slopes', which has now evolved into the Conserving the Park land management scheme, creating the first local conservation grazing scheme in Wales.

4.3 The NPAs have been exemplary in trailblazing and exemplifying sustainable development and at testing new solutions to environmental challenges e.g. the Brecon Beacons NPA kick-started the Green Valleys initiative⁹ by providing advice, funding and officer time through a secondment. This scheme is now widely recognised as a leader in community involvement in sustainable development. Snowdonia NPA has achieved Level 3 of the Seren Environmental Management Standard and the Pembrokeshire Coast and Brecon Beacons NPAs have achieved Green Dragon level 4.

⁸ Strategic Grant letter from the Minister for Culture and Sport to the Chairs of the 3 NPAs, 10 May 2013; consultation draft policy statement on Protected Landscapes

⁹ <http://www.thegreenvalleys.org/>

Question 1 – Are designated landscapes equipped to meet the current and future needs of Wales?

A – The strengths and weaknesses of the existing system of designated landscape statutory purposes and statutory duties.

A1 Delivery and impact – strength

A1.1 The drive to deliver National Park statutory purposes and the associated duty and the relatively small size and resourcing of NPAs has resulted in an operating culture that is focused on maximising both the quality and impact of service delivery and on effective partnership working.

A1.2 As a starting point, the NPAs place great importance on recognising the needs of beneficiaries within service delivery e.g. in 2012 Pembrokeshire Coast NPA was praised by the Welsh Language Board for its progress on mainstreaming the Welsh language into its policies and strategies.

A1.3 High standards of service delivery have become the norm in National Parks e.g. in 2012 Snowdonia NPA received a Customer Service Excellence Standard certificate from the Cabinet Office¹⁰ for achieving an exceptional standard in providing customer service, with particular commendation for listening and understanding the needs of users before investing to improve its service provision. This award was retained in 2013 and 2014¹¹. Snowdonia NPA has been highly commended by the Welsh Local Government Association in its Excellence Wales Awards for its response to climate change and biodiversity.

A1.4 Efficient corporate planning and resource management processes mean that the finances of each NPA are managed soundly resulting in debt-free authorities. Each NPA has a corporate management team that works with the Chief Executive to provide leadership, vision and strategic direction, define corporate culture and promote core values and ensure statutory obligations are met and sound corporate governance. NPAs receive very low levels of complaints from the public or service users, including to the ombudsman.

A1.5 The NPAs use their partnerships and Sustainable Development Funds to support and foster innovation and to drive behaviour change e.g. Pembrokeshire Coast NPA's support for Veg Oil Motoring, based in North Pembrokeshire, provided 50% of the costs for converting vehicle diesel engines to run on straight vegetable oil (SVO). Each converted vehicle has a bilingual sign to indicate that it has been converted to run on SVO in order to promote awareness of the renewable, carbon neutral fuel. Through the project, 77.6 tonnes of CO2 were saved, 48 vehicles and one generator were converted and the project influenced Government thinking, cutting red tape through the removal of the duty on those producing less than 2,500 litres of SVO per annum.

A1.6 NPAs are expert in harnessing the resources and opportunities that flow from partnership working and applying these for the benefit of service delivery in the National Park, delivering more collective value for National Park purposes and communities e.g. the Snowdonia NPA masterminded the complex £8.5 million engineering operation¹² that removed the old building on Snowdon Summit and replaced it with the unique, low impact Hafod Eryri, a project that renewed visitor interest in the mountain and made a direct contribution to the local visitor economy.

A1.7 Continual performance review and improvement is an integral part of NPAs' operating model e.g. Brecon Beacons NPA and Pembrokeshire Coast NPA undertook a pilot project to

¹⁰ <http://www.eryri-npa.gov.uk/park-authority/newsroom/press-releases-2012/2012-09-05>

¹¹ <http://www.eryri-npa.gov.uk/park-authority/newsroom/2014-09-23>

¹² <http://www.eryri-npa.gov.uk/visiting/hafod-eryri>

develop a scrutiny model for NPAs. A scrutiny tool kit was produced along with reports on the contribution of the Sustainable Development Fund and the management of Public Rights of Way. Since then both NPAs have undertaken scrutiny projects, with the Pembrokeshire Coast and Snowdonia NPAs currently undertaking a joint scrutiny exercise on the impact of NPA policies on economic development.

A1.8 These efficient and customer-focused practices allow NPAs to maintain a strong focus on the local delivery of core, front-line services. **However, whilst we are constantly striving to achieve and share best practice and have an excellent record on service delivery and improvement, including on planning, we are receptive to new ways of working that will improve our ability to deliver effectively and efficiently.**

A2 Positive impact on communities – strength

A2.1 The model of managing National Parks in the UK is recognised internationally as one that respects and engages the interests of local communities in relation to conservation¹³.

A2.2 National Parks deliver a range of benefits for their communities, including positive economic, social, sustainability, educational and health impacts, many of which are achieved concurrently e.g. the Brecon Beacons became the first international dark sky reserve in Wales¹⁴. This generated worldwide publicity which has increased interest in the area and spurred a new interest in ‘astro-tourism’ in the Brecon Beacons. Local hotels and B&Bs attract astro-tourists by offering star maps and telescopes, and have learned more about the night sky through the Brecon Beacons NPA’s Dark Sky Ambassador course.

A2.3 National Parks are places where the importance of the Welsh language is recognised and celebrated e.g. the Welsh language is one of the special qualities of Snowdonia National Park and a fundamental part of its cultural heritage¹⁵. In the 2011 census 59% of Snowdonia’s population were Welsh speakers and the area is a heartland of the Welsh language. The Welsh language is particularly evident within the NPA as 93% of its staff are Welsh speakers¹⁶. The proceedings of almost all of the NPA’s meetings are also invariably held through the medium of the Welsh Language – with simultaneous translation, if needed.

A2.4 Public service delivery on natural resource management is complex, not least because ecosystems, habitats and catchments are complex entities; this is one of the reasons why Natural Resources Wales was established by the Welsh Government as a one-stop shop to deliver a more coherent environmental regulatory framework¹⁷. NPAs provide a complementary service to this by acting as one-stop shops within defined geographical areas, providing expertise, consistent service delivery and connections with communities.

A2.5 NPAs employ a range of techniques to involve people in decisions on service delivery and performance e.g. the Brecon Beacons NPA has worked with Planning Aid Wales¹⁸ to engage communities in the Local Development Plan process – this has been promoted by Planning Aid Wales as best practice on community engagement.

A2.6 Through an initial grant from the Welsh Government Scrutiny Fund, and in partnership with the Pembrokeshire Coast NPA, the Brecon Beacons NPA has developed a scrutiny model which takes account of the constitution of NPAs – i.e. there is no cabinet or executive system and all members make decisions. The Brecon Beacons opted to carry out two

¹³ The Welsh National Parks are classified by the IUCN as Category V Protected Landscapes, a status defined by a balanced interaction between people and nature. This has recently been reviewed and re-assigned

¹⁴ <http://www.bbc.co.uk/news/uk-wales-21496562>

¹⁵ http://www.nationalparks.gov.uk/learningabout/whatisanationalpark/specialqualities/special_qualities_sn

¹⁶ Snowdonia National Park Authority’s Welsh Language Scheme: 2012/13 Monitoring Report

http://www.eryri-npa.gov.uk/_data/assets/pdf_file/0010/343774/SNPA_WLS_MonitoringReport_12-13.pdf

¹⁷ <http://wales.gov.uk/about/cabinet/cabinetstatements/2013/naturalresourceswales/?lang=en>

¹⁸ <http://www.planningaidwales.org.uk/how-paw-can-help/training/case-studies>

scrutiny studies each year linked to improvement objectives, which would provide additional data and feedback to inform external audit and the NPA's own performance monitoring. The NPA asks for input from the public in deciding which improvement objective to scrutinise, by way of a public vote on its website, promoted through the use of social media. This gives NPA members an indication of what the public is interested in. Public involvement is further encouraged by inviting people to sit on scrutiny panels for each review. These opportunities have been taken up enthusiastically and positive feedback has been received from participants. The contribution from the public has enabled the panels to make recommendations to the NPA which have led to improvements in service delivery, communication, joint working and reputation.

A3 Responsiveness to local needs – strength

A3.1 The relatively small scale nature of NPAs means that decision makers are more accessible and able to be more responsive than those in local authorities and other public bodies. NPAs are close to the people and have strong local connections. Anecdotal evidence from the Brecon Beacons NPA is that community council representatives greatly value their relationship with senior NPA representatives. In 2012-13 28 of the 52 Town and Community Councils within the Brecon Beacons National Park actively participated in the Community Council Charter developed by the NPA and 17 Councils were direct signatories to the Charter.

A3.2 Responsiveness to local needs contributes to high standards of service delivery e.g. the Snowdonia NPA led a partnership to build a new centre on the site of the Ogwen Warden Centre¹⁹, the gateway to Cwm Idwal in Snowdonia. The intention was to create an attractive gateway to Snowdonia which would, in turn, improve people's understanding and enjoyment of Cwm Idwal. An independent assessment by SGS found that the design of facilities reflected outcomes of consultation with groups of disabled people, schools, community groups and businesses, resulting in a facility of an excellent standard and reflecting the NPA's responsiveness and willingness to take extra steps to provide an excellent service.

A3.3 The NPAs have a good track-record in operating a responsive planning service e.g. during 2013-2014 in the Pembrokeshire Coast 89% of Planning Enforcement cases were resolved within 12 weeks.

A3.4 NPAs undertake regular surveys of users as part of service monitoring and improvement. In the Brecon Beacons planning customers' overall satisfaction ratings²⁰ with the service received have increased from 76% in 2010-11, to 88% in 2011-12 to 91% in 2012-13. In Snowdonia, overall satisfaction with the planning service was rated 93% by planning applicants in 2012-13, with satisfaction rates for advice received by planning officers at 97%. Each NPA has a planning service improvement plan which is regularly monitored and updated.

A4 Expert and experienced staff – strength

A4.1 NPAs employ an expert and committed staff body which includes rangers, estates workers, farm advisers, ecologists, woodland advisers, Public Rights of Way officers, access advisers and tourism, recreation, education, interpretation and information specialists. Effective partnership working allows NPAs to reach beyond their own organisational skills. In addition, the NPAs have a large, active and highly motivated volunteer reserve to call upon to support the delivery of the purposes e.g. across the three NPAs in 2013-14, over 500 volunteers provided 20,000 hours of volunteer time, worth almost £300,000.

A4.2 NPAs apply their resources and expertise to manage the land within their areas in an integrated way. The co-ordinated skills, expertise and resources available from the NPAs

¹⁹ <http://www.eryri-npa.gov.uk/park-authority/Ogwen/ogwen-consultation>

²⁰ Customers who viewed the service as fair and above

enable a landscape-led and joined-up approach to the stewardship of the countryside. In this integrated approach to the management of the National Parks, each action taken or encouraged by the NPA is designed to deliver several relevant objectives at the same time and to have multiple benefits so that maximum impact is derived from the resources employed e.g. the Brecon Beacons NPA leads a diverse partnership to control the impacts of recreation in the popular waterfalls area near Pontneddfechan, which is internationally important for its wildlife. This has reduced impacts and delivered footpath restoration, renewed signage and interpretation, a gorge walking code of conduct (the development of which was led by outdoor providers) and increased awareness of the area's rich natural and cultural history.

A4.3 NPAs also take a leading role in relation to cultural heritage with work to protect historic buildings and managing sites of cultural and historic significance such as Yr Ysgwrn, Castell Henllys and Carew Castle. Through working in partnership NPAs are able to access and promote the work of other public bodies as illustrated by the partnership between Pembrokeshire Coast NPA and the National Museum of Wales to exhibit works from the National Collection at the Landscape Gallery at Oriel y Parc in St Davids.

A5 Planning function – strength

A5.1 We understand that Stage 2 of the Review will examine our governance and management arrangements. However, as the planning function of NPAs is a significant tool for achieving our purposes and duty, it merits mention in our Stage 1 response.

A5.2 The role of the planning system to regulate the use of land in the public interest is a challenging one and is at its most challenging in sensitive landscapes such as National Parks. Our planning responsibilities have evolved over time, and, following independent assessment and regular user evaluation, are continually improving. **As a result, we are amongst the best performing and most responsive planning authorities in Wales** (see Section A5.17).

A5.3 NPAs are key delivery bodies for the proposals in both the Environment and Well-being of Future Generations (Wales) Bills. The planning function is critical if NPAs are to play their fullest part in assisting with the delivery of the proposed measures and outcomes of these bills.

A5.4 The 3 NPA planning authorities cover 20% of Wales; if other local planning authorities operated at a similar scale this would only require 15 across the whole of Wales, which is in keeping with the recommendation of the Commission on Public Service Governance and Delivery to reduce the number of planning authorities.

A5.5 There are three elements of our planning service that bear particular mention in this Stage 1 response: (i) the benefits of NPAs operating a planning function; (ii) the role of planning in delivering National Park purposes and the associated duty; (iii) NPAs' performance on policy planning and development management.

(i) The benefits of NPAs operating a planning function

A5.6 There are several benefits of NPAs operating as the local planning authority, not least the ability to plan to National Park boundaries. This provides consistency across the designated landscape, alignment with the National Park Management Plan and a clear focus on National Park purposes. Without an NPA planning function there would be an inconsistent approach to the management of development. The resulting lack of coherence between management and development planning would undermine the delivery of National Park purposes.

A5.7 Park-wide planning has stood the test of time and, within the context set by independent NPAs, has resulted in a coherent approach to land use planning, recreation, land and visitor management functions, with Park communities and businesses benefiting from a

consistent policy framework covering the whole of the National Park, whilst retaining the unique characteristics of each of the National Park areas.

A5.8 In 2012, the Planning Division of the Welsh Government commissioned a study²¹ on the Delivery of Planning Services in Statutory Designated Landscapes in Wales (the LUC evaluation) (annex 2). This recognised:

‘...the key advantage of planning to National Park boundaries is that NPAs can adopt a consistent approach across the whole of the National Park area in their Local Development Plan regardless of local authority boundaries. This allows clear focus to be given to National Park purposes and allows alignment with the National Park Management Plan, creating a coherent approach and a clear focus across each National Park’. (paragraph 4.6).

‘...the importance of statutory designated landscapes having their own clear identity, separate from that of the constituent local authority(s). This enables consistency in the delivery of planning functions across the statutory landscape’. (paragraph 4.18)

A5.9 The benefits of NPAs operating a planning function are recognised by a number of our partners e.g. in February 2014 RTPI Cymru stated in its response²² to the Draft Planning (Wales) Bill and Positive Planning Consultation:

‘Ultimately, areas are designated as national parks because of the quality and distinctiveness of their landscape and heritage – their distinctiveness as places. The planning function is a key mechanism for managing, sustaining and enhancing those qualities. To remove this function from NPAs would seriously undermine their effectiveness. It could put the special qualities of the national parks themselves at risk.’

A5.10 Whilst we have highlighted our planning function as a key strength, it must be stressed that any diminution or removal of NPAs’ responsibility for planning would be a significant weakness in terms of our ability to deliver National Park purposes and the associated duty or indeed the revised and additional purposes proposed within this response.

(ii) Role of planning in delivering National Park purposes and the duty

A5.11 The current Welsh Government policy statement on National Parks and NPAs²³ recognises that:

‘the NPAs’ role as the local planning authorities for their areas is a vitally important one, and one that fully underpins their key statutory purposes and one that contributes to the delivery of sustainable development’.

A5.12 The importance of planning in supporting biodiversity in National Parks has been recognised by the Minister for Culture and Sport in his strategic grant letter for 2013-14²⁴.

A5.13 The NPAs’ operation of the planning function has successfully underpinned and supported economic activity. Independent research by ARUP on the value of Wales’ National Parks found that overall the National Park economies account for £557m of GVA, representing 1.2% of the Welsh economy. Economic activity that is concerned with the protection or

²¹ Delivery of Planning Services in Statutory Designated Landscapes in Wales, prepared for Planning Division of the Welsh Government by LUC (August 2012)

<http://wales.gov.uk/docs/desh/research/121022planningstatutorylandscapesen.pdf>

²² http://www.rtpi.org.uk/media/941988/rtpi_cymru_positive_planning_response_feb_2014.pdf

²³ Policy Statement for National Parks and National Park Authorities, Welsh Government (March 2007)

<http://wales.gov.uk/about/cabinet/cabinetstatements/2007/1321477/?lang=en>

²⁴ Letter from the Minister for Culture and Sport to the Chairs of the 3 NPAs (10 May 2013)

management of the environment, or that is dependent in some way on the environment supports 10,738 jobs directly within National Parks and a further 2,033 jobs across Wales. The Parks receive 12 million visitors each year spending an estimated £1bn on goods and services. **We believe that the time has come to revisit NPAs' statutory responsibilities on the economy to ensure that we are fully equipped to continue this important role.**

(iii) NPAs' performance on policy planning and development management

A5.14 The LUC evaluation found that overall the planning system is working well in National Parks. NPAs are recognised as exemplars of good governance in local government, which provides a stable platform for the delivery of their planning services e.g. all three NPAs have achieved the charter for member development and the Brecon Beacons NPA is one of only two authorities in Wales to have achieved the advanced charter for member development²⁵. There are high standards of customer-facing service delivery in National Parks, underpinned by a commitment to transparency and openness, which help to boost the delivery of the planning function.

A5.15 The LUC evaluation found many examples of good practice within NPAs, as well as good performance in relation to national indicators for planning service delivery. At the local level, each National Park local development plan was found to provide a consistent policy context for planning to the boundary of the statutory designated landscape, in line with National Park purposes. This should be contrasted with the weak and inconsistent position the evaluation found in AONBs, due to the number of local planning authorities involved in their management.

A5.16 All three Welsh NPAs have made excellent progress on local development plans²⁶. Pembrokeshire Coast NPA was the first local authority in Wales to succeed in getting its plan adopted, Snowdonia NPA achieved adoption in 2011 (and was the first local authority in North Wales to adopt) and Brecon Beacons NPA achieved adoption in 2013. This means that the NPAs are outperforming several other local authorities (including Gwynedd, Powys, Monmouthshire and Carmarthenshire) and that communities and businesses within National Parks have a more certain and up to date policy framework to guide their needs and aspirations than their neighbours.

A5.17 On development management, the Welsh Government's most recent statistical information²⁷ about the handling of planning applications by local planning authorities shows that for development management the Brecon Beacons NPA came first and Pembrokeshire Coast NPA came third out of the 25 planning authorities in Wales.

A5.18 Examination of the planning performance framework – indicator dashboard²⁸ that was published by the Welsh Government alongside the 'Positive Planning' consultation document demonstrates that the three NPAs are performing well across the planning spectrum.

A6 Conservation outcomes – strength

A6.1 NPAs have a good track record on delivering conservation objectives on both natural and cultural heritage. In 2012, Snowdonia NPA secured funding from the Ecosystems Resilience and Diversity Fund to run a £35,000 scheme to restore 38ha of blanket bog which includes opportunities for volunteering and educational work for local schools. The scheme is now considered an exemplar project and has been commended for its design, operation and outputs. The NPA also ran the £5.2M Rhaglen Tir Eryri programme, which delivered a

²⁵ <http://www.wlga.gov.uk/member-development-charter>

²⁶ <http://wales.gov.uk/docs/desh/policy/130426development-plan-progress-en.pdf>

²⁷ <http://wales.gov.uk/topics/planning/planningstats/development-control-management-survey/april-to-june-2014/?lang=en>

²⁸ <http://wales.gov.uk/consultations/planning/draft-planning-wales-bill/?lang=en>

number of outcomes identified in the National Park Management Plan including a pioneering approach to the reinstatement of peat bogs to their natural 'boggy' state.

A6.2 Snowdonia NPA has taken a lead on Rhododendron control over many years. The eradication scheme is worth £800,000 and is administered fully by the NPA due to its specialist knowledge in this area and non-bureaucratic approach to tenders. Contracts for eradication work are awarded locally and provide 30 jobs within the National Park.

A6.3 The Woollenline²⁹ project at Pen Trumau in the Black Mountains in the Brecon Beacons National Park uses a highly innovative approach to restore damaged peat bog. Llangynidr-based artist Pip Woolf runs the artistic project which uses lines of wool to protect peat from erosion, and joins local communities together in the process. The project won the nationally acclaimed Park Protector Award³⁰ in 2013.

A6.4 Pembrokeshire Coast NPA succeeded in doubling skylark numbers following its purchase of a former military airfield in St Davids. There were just 30 pairs of skylarks recorded 12 years ago; recent surveys have found that numbers have more than doubled to 65 pairs. The NPA achieved this by changing the management practice to traditional grassland management, which benefits the skylarks.

A6.5 A further strength of the NPAs is their ability to use their collaborative and partnership working skills to recruit public and private finance to the delivery of conservation outcomes. This often provides the necessary stimulus for projects that would otherwise be unlikely to happen. Several developments of national conservation significance would not have happened without the drive and commitment of NPAs and their collaborative efforts e.g. in Snowdonia, the work of the NPA saved a historic cultural settlement and artefacts at Yr Ysgwrn³¹, the home of Hedd Wyn a Welsh Language Poet who was killed during World War 1 and posthumously awarded the bard's chair at the 1917 National Eisteddfod. The Farmhouse, land and bardic chairs were all saved for the nation by Snowdonia NPA because of the close relationship built up over the years with the local community. Without the NPA's leadership there is no doubt that the collection would have been sold and dispersed.

A7 Recreation outcomes – strength

A7.1 NPAs have a long history of innovative working and pioneering new approaches to access and recreation management, many of which have been later adopted as standard practice by local authorities. The excellent performance of the NPAs in the management of countryside access and recreation was recognised by the Wales Audit Office in 2006³², with examples of best practice in partnership working with landowners and the private sector, environmental education, promotion of access opportunities via the internet and the integration of public transport with countryside access provision.

A7.2 In recognition of the primacy of public rights of way in the delivery of their second statutory purpose, the NPAs have taken a proactive approach to the management of public rights of way. Brecon Beacons and Pembrokeshire Coast NPAs have formal delegation agreements with their host local authorities, transferring the statutory responsibility for the maintenance of public rights of way to the NPAs. Snowdonia NPA has a service level agreement with one of its local authorities.

A7.3 The proportion of public rights of way that are classed as easy to use in the National Parks is well above the Wales average (public rights of way currently easy to use are 76% in

²⁹ <https://woollenline.wordpress.com/>

³⁰ <http://www.cnp.org.uk/news/park-protector-award-winner-announced-today>

³¹ <http://www.eryri-npa.gov.uk/a-sense-of-place/yr-ysgwrn>

³² Public Access to the Countryside, Wales Audit Office (2006)

the Brecon Beacons and 83.5% in the Pembrokeshire Coast; the performance indicator for Wales is 55%³³).

A7.4 NPAs' rich experience in the management of public rights of way has enabled them to inform national guidance such as the CCW publications 'By All Reasonable Means: Inclusive Access to the Outdoors for Disabled People' and 'Managing Public Access'.

A7.5 NPAs have also advised on the introduction of new legislation such as the Countryside and Rights of Way Act 2000 and piloted the establishment of Local Access Forums and the preparation of Rights Of Way Improvement Plans to assist in the development of regulations and statutory guidance on the implementation of these new duties.

A7.6 NPAs are expert in harnessing the resources and opportunities that flow from partnership working and applying these for the benefit of service delivery in the National Park, including on recreation management e.g. the Pembrokeshire Coast NPA's management of the Pembrokeshire Coast Path National Trail has provided a template for the delivery of the Wales Coast Path, and has resulted in a number of awards and accolades for the Coast Path, including being voted the second best coastline in the World (and the best in Europe) for sustainable tourism management³⁴. The NPA also established the long-standing Outdoor Charter and Marine Code in Pembrokeshire, both of which continue to be emulated by bodies throughout the UK and further afield as examples of good practice.

A7.7 NPAs are highly experienced at managing visitors at sensitive locations e.g. the Snowdonia NPA's skills in visitor management enable 600,000 people to visit Snowdon each year without affecting the conservation value of the area.

A7.8 Whilst positive outcomes have been achieved for access and recreation, we believe designating NPAs as Recreation Authorities would enable us to deliver even greater impact. We examine the case for this more fully in Section C5 of this response.

A8 Economic impact and outcomes – strength

A8.1 Wales' National Parks generate a number of economic outcomes for their local communities and for the Welsh economy more broadly. A 2013 study by ARUP³⁵ (annex 1) found that **the three National Parks are a significant part of the Welsh economy and that overall National Park economies account for £557 million Gross Value Added representing 1.2% of the Welsh economy. Their environments directly support 10,738 jobs within their boundaries and a further 2,033 jobs across Wales. In National Parks 38% of employment is directly linked to the environment, compared to 17% for Wales as a whole.**

A8.2 The study also highlighted that economic benefits of the National Parks are felt outside the Park boundaries, particularly with regard to the tourism sector. **The Parks receive 12 million visitors each year who spend an estimated £1bn on goods and services.** This greatly exceeds the turnover of tourism-related businesses within the National Parks themselves, reflecting the fact that visitors to the Parks also stay and spend time in other parts of Wales.

A8.3 The National Parks contribute to people's quality of life in a variety of ways that extend beyond economic impact. They are an important recreational resource and provide access to open space, which enables a wide range of activities that are beneficial to people's mental and physical health and well-being.

³³ Wales Government Data Unit

³⁴ National Geographic Magazine poll of 340 travel journalists, 2010

³⁵ Valuing Wales' National Parks, ARUP, September 2013

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

A8.4 National Parks are also an important part of our cultural identity both locally and nationally. People are proud to live within a National Park and the very existence of National Parks in Wales adds to a sense of pride in Wales. For example, Snowdonia is so iconic that it forms a part of Wales' national psyche (it almost forms part of our 'national signature' – i.e. National Parks are a key component of what makes Wales special). A survey³⁶ of residents in the Brecon Beacons National Park found that 95% of residents think it is important to look after and promote the historic environment and cultural heritage of the National Park. On a wider scale, National Parks are a part of what makes the UK special and this is reflected in the reasons why people visit Wales' National Parks in their millions.

A8.5 National Parks also provide a range of other ecosystem services, the value of which is not always captured in measures of output and GVA. These include the benefits of clean rivers and seas, carbon storage and clean air.

A8.6 The ARUP study estimated the value of water supply originating from National Parks to be £6.7m annually. The value of carbon sequestered through peat and woodland within the National Parks was estimated to be between £24.4m and £97.2m. Conservation programmes by the NPAs add value by sustaining and strengthening the ecosystem services provided.

A8.7 The study also highlighted many examples of the added value of the activities of NPAs. The NPAs maintain the tourism infrastructure of the Parks – from information centres to footpaths – ensuring access to the environment for recreation. They work in partnership with tourism bodies to promote the Parks to visitors and promote the benefits of sustainable tourism to the industry.

A8.8 The NPAs enhance social capital through the provision of education programmes, social inclusion programmes and community development programmes which add to the base inherent value of the assets found within National Parks.

A8.9 The role of NPAs as leaders and facilitators – working to provide expertise to others and delivering and driving projects in partnership – has become increasingly important as the NPAs seek to deliver more with limited resources. The NPAs receive funding, through the National Park Grant and National Park Levy, of around £15m per annum, representing less than £5 per person in Wales.

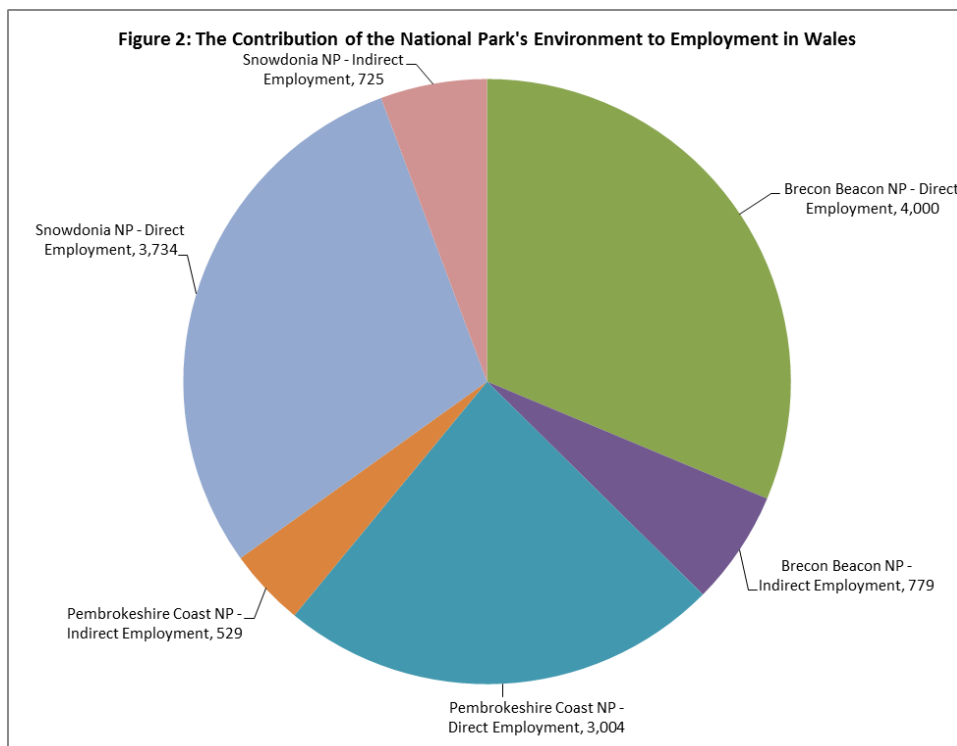
A8.10 NPAs have an excellent track record in raising additional income through grants and other sources – e.g. in 2012-13 the three NPAs generated additional funds of over £5 million, which is about one third of their total income.

A8.11 The Sustainable Development Funds operated by the NPAs have a strong multiplier effect in terms of cash matching, volunteer hours and in-kind contributions³⁷. For every £1 granted by the fund, approximately £5 is attracted to the National Parks.

A8.12 The ARUP study revealed that the value of economic activity that is dependent on the quality of the environment within the National Parks greatly outweighs the value (and cost) of activity concerned with the protection and management of the environment.

³⁶ Brecon Beacons National Park Residents Survey, August 2013
<http://www.breconbeaconstourism.org/documents/BBNPResidentsSurvey-Aug2013.pdf>

³⁷ See pages 4 and 5 of <http://www.beacons-npa.gov.uk/the-authority/who-we-are/scrutiny/sustainable-development-fund-scrutiny-report>



A9 Social inclusion and tackling poverty outcomes – strength

A9.1 There is a direct link between the work of NPAs to deliver the statutory purposes of National Parks and the Welsh Government's commitment to sustainability, the alleviation of poverty and addressing the root causes of inequality. The NPAs have undertaken many initiatives that tackle these issues in an integrated way, including through supporting community-led projects with grants from their Sustainable Development Funds. The NPAs recognise that there is still much work to do to deliver the outcomes envisaged by the Well-being of Future Generations (Wales) Bill and are committed to mainstreaming this work across their operating functions. **Elevation of responsibilities for social and economic well-being to a statutory purpose would allow NPAs to deliver even more for their communities.**

A9.2 The Mosaic project³⁸ is a good example of where the NPAs have worked with civil society on social inclusion. The project currently works with black and minority ethnic communities. Mosaic project officers operate in each of the three National Parks, recruit community champions, organise visits and activities and introduce new people to the Parks. This project contributes to the NPAs' shared aim to make sure that everyone has an equal opportunity to experience National Parks and to share in the health, cultural, educational and environmental benefits that they offer.

A9.3 As a direct result of work with Snowdonia Champions, Snowdonia NPA has started an equalities forum to ensure inclusion of all under-represented groups in the NPA. Community Champion, Homan Youssofi, a cleaner at Bangor University, has been so inspired by Snowdonia's landscapes that he organised a series of walks and events in Snowdonia, inspired by poetry, literature and music from the area. He has introduced over 50 adults to both Snowdonia's inspirational landscapes and its cultural heritage and organised similar events for schoolchildren in conjunction with Wales' young people's laureate, Martin Daws.

A9.4 NPAs demonstrate leadership on social inclusion beyond the Mosaic project e.g. the Pembrokeshire Coast NPA has been active in engaging children and excluded young people

³⁸ Mosaic is a partnership between the Campaign for National Parks, the NPAs and the YHA. Across Wales 65 Mosaic champions have introduced over 1,000 people from BME urban communities to the Parks since 2012

through its work with schools and the ‘Your Park’ project³⁹ and in promoting the use of the National Park for health and well-being through Walkability⁴⁰.

A9.5 Sustainable Development Funds have contributed to a wide range of projects on tackling social inclusion and poverty e.g. in the Pembrokeshire Coast projects include the pilot construction of an affordable timber house⁴¹ which has recently led to planning permission being agreed for a solar hamlet of affordable houses in Glanrhyd, using around 15% of the energy needs of a conventional house⁴².

A9.6 The NPAs are also concerned with the future viability of the communities within National Parks e.g. in Snowdonia the Sustainable Development Fund has supported a Skills Centre in Dolgellau which will provide training for learners 14-16, 16-19, adults and businesses to increase the present and future skills level, in order to promote the green economy in Meirionnydd and Mid Wales. It is envisaged that 817 individuals will benefit from the centre over the next three years.

A9.7 The Brecon Beacons NPA has a long history of promoting local skills, first through its Rural Skills programme, which provided accredited training for disadvantaged individuals and now through the Skills in Action programme, which will run until 2018 and also involves the Pembrokeshire Coast NPA. This mainly targets young people, including NEETs, and the total value of the project is over £1m. As well as providing specific accredited training for the environment sector, the project offers one year of paid work experience alongside professional NPA staff. The first of 3 tranches of trainees started in September 2014: 6 in the Brecon Beacons NPA, 1 in Torfaen (hosted by the NPA) and 5 in the Pembrokeshire Coast NPA.

A9.8 The Sustainable Development Funds provide direct financial support to local businesses e.g. in the Brecon Beacons support was given to the Myddfai trading company, which aims to support social, recreational, welfare and employment opportunities in and around Myddfai, helping this small business to achieve economies of scale and to compete in difficult economic conditions.

A9.9 NPAs address the challenge of the shortage of affordable housing in partnership with local housing authorities and housing associations e.g. by supporting the work of Rural Housing Enablers who work on behalf of local communities to carry out housing need surveys and come up with tailor-made solutions to meet identified local housing need.

A9.10 The Rural Housing Enabler Projects have been successful in bringing together housing and planning professionals. The initiatives have produced concrete results in providing small scale, low cost affordable housing with improved communication between the essential players. This approach resulted in the following outcomes in Snowdonia in 2012-13:

Residential Completions	%
Open market	28.1
Affordable	64.9
Agri Workers Dwelling	7.0

Residential Planning Permissions	%
Open market	35.7
Affordable	54.8
Rural Enterprise Dwelling	9.5

³⁹ <http://www.pembrokeshirecoast.org.uk/?PID=596>

⁴⁰ <http://www.pembrokeshirecoast.org.uk/default.asp?PID=660>

⁴¹ [http://www.coedcymru.org.uk/images/user/CABAN%20UNNOS%20FLYER%20C%20\(2\).pdf](http://www.coedcymru.org.uk/images/user/CABAN%20UNNOS%20FLYER%20C%20(2).pdf)

⁴² <http://www.pembrokeshiresbestmagazine.com/2014/08/14/solar-hamlet-plans-approved/>

A10 Duty to have regard to National Park purposes – weakness

A10.1 Section 11A(2) of the 1949 National Parks and Access to the Act (inserted by section 62 of the 1995 Environment Act) requires any relevant authority (such as various public bodies and statutory undertakers), when exercising or performing functions which relate to or affect land in a National Park, to have regard to National Park statutory purposes. This duty is commonly referred to as the Section 62 duty.

A10.2 The duty was introduced as recognition that landscape management is not undertaken in isolation by NPAs, but depends upon a wide range of stakeholders working together to deliver shared outcomes.

A10.3 Despite having existed for nearly 20 years, the duty is widely regarded as ineffective for a number of reasons, principally because:

- The weak construction of the ‘have regard to’ duty is such that it is possible to demonstrate compliance without achieving any meaningful contribution to the purposes;
- There is very low awareness of the duty amongst relevant authorities, with no reporting of implementation e.g. local authority highway departments focus on cost efficiency in highway maintenance, often at the expense of visual amenity;
- Neither the Welsh Government nor Natural Resources Wales has assumed an oversight role on the duty. As a result there is no monitoring of the success of the duty and no clear mechanism through which to achieve compliance.

A10.4 We believe that the duty therefore needs revision and reinvigoration if it is to deliver its intended purpose of ensuring a greater buy-in from relevant authorities to the shared work of delivering National Park purposes.

A10.5 At present the duty acts as little more than a voluntary ‘tick box’ exercise from which many bodies opt out. Instead, we would like to see a much more engaging, positive obligation placed upon relevant authorities. We suggest replacing ‘have regard to’ with ‘support’.

A10.6 We also suggest that the duty should be linked to the Management Plan rather than the purposes *per se*, as is the case in Scotland. The status of the Management Plan should be elevated so that it is laid before the National Assembly for Wales on a five year cycle. This would provide an opportunity for management plans and any associated issues, including the contribution of public bodies, to be debated in public.

A10.7 There should be a legal requirement on relevant authorities to report annually on how they have supported the delivery of the National Park Management Plan. This could be done in combination with reporting on the delivery of relevant authorities’ parallel duty to have regard to the purpose (or management plan, if this duty was also revised) of AONBs.

A10.8 In Scotland, there is no such obligation on relevant authorities. Instead the NPAs try to work through the relevant Minister and their writing of a letter at the time of the launch of the Plan setting out expectations on relevant authorities and their chairing of an annual meeting at senior level to make sure that all authorities understand and report on the collective effort required to manage the Park. **We believe that a legislative reporting requirement on relevant authorities would be more effective and likely to achieve a level playing field.**

A10.9 The guidance issued in 2005 on the duty should be updated and referred to within the Welsh Government’s policy statement on protected landscapes. The list of

relevant authorities in the current guidance is out of date and should be updated. Relevant authorities must be reminded of the existence and requirements of the duty.

A10.10 We therefore suggest that the legislation could be amended as follows:

Duty of certain bodies and persons to support National Park Management Plans

In exercising or performing any functions in relation to, or so as to affect, land in a National Park, any relevant authority must support the National Park Management Plan as adopted under section 66(2) of the 1995 Environment Act and report annually on how this has been achieved.

A11 Institutional arrangements – weakness

A11.1 There are a number of historical institutional arrangements which have a material impact on our ability to deliver National Park purposes and the associated duty. These include:

- **The disjointed nature of various regulatory regimes** e.g. development management and building regulation are managed by different bodies within National Parks. Better co-operation between NPA planning services and areas such as building regulation would provide a more user-friendly service for communities and businesses wishing to undertake works that fell within both regimes;
- **The lack of tie-in between national agri-environment schemes and National Park purposes** e.g. Glastir will benefit the rural economy and environment in a number of ways, providing the opportunity to improve large areas of the uplands as well as productive farmland in sensitive areas. However, the scheme was developed in isolation from National Park purposes and could have been designed with the purposes more in mind, benefiting National Park landscapes more fully;
- **The large number of public bodies operating within National Parks on the management of natural resources. We believe there is scope for new forms of partnership working and possible transfer of management responsibility on natural resource management** e.g. the partnership management and promotion of Cwm Idwal National Nature Reserve⁴³ by Snowdonia NPA, Natural Resources Wales and the National Trust could offer valuable lessons for other areas. We comment further on natural resource management in Section B5 of this response;
- **The absence of sustained national leadership on National Parks.** The Commission on Public Service and Delivery highlighted a lack of national leadership for National Parks. We consider that this should be provided in the first instance by Natural Resources Wales. As part of this, **we would expect to see Board-level leadership and ownership of a vision and statement of general policy for protected landscapes and an enhanced role in joining us on promoting collaboration and knowledge exchange between protected landscape management bodies. There should be explicit recognition within the Environment Bill of Natural Resources Wales' responsibilities for protected landscapes. The Welsh Government should outline its vision for protected landscapes;**
- **Fulfilling our leadership potential in Destination Management.** NPAs already play a strong leadership role within and in developing Destination Management

⁴³ <http://www.ccw.gov.uk/landscape--wildlife/protecting-our-landscape/special-landscapes--sites/protected-landscape/national-nature-reserves/cwm-idwal.aspx?lang=en>

Partnerships⁴⁴. Experience in the Brecon Beacons (which is a Destination in its own right, unlike Snowdonia and the Pembrokeshire Coast) clearly highlights that the leadership role could be further developed in future elsewhere, providing better opportunities for visitors, users and businesses. Much of what NPAs deliver can be regarded as contributions to the local economy through tourism – path work, information provision, interpretation, traffic management, development management etc. Recognition of this leadership role of NPAs by Visit Wales would be helpful in enabling NPAs to develop their leadership ambitions and to deliver cohesive and sustainable destination management and development.

B – Potential challenges and opportunities facing Wales’ designated landscapes.

B1 There a large number of challenges facing Wales’ designated landscapes, which will require NPAs to adapt to changing circumstances but in many cases will also present opportunities. We highlight five of the more significant challenges and opportunities below.

B2 Maintaining relevance in and meeting the needs of a changing society

B2.1 As society becomes more urbanised and people’s lifestyles become more sedentary, there is a risk that National Parks will be increasingly remote from large sectors of the population but allied to this an opportunity to play a much greater role in improving people’s quality of life. Ensuring that the designated landscapes remain relevant and forward-looking was one of the reasons why the Review was instigated.

B2.2 The annual Welsh Health Survey for 2013⁴⁵ found that obesity levels had increased since the survey began in 2003-04, with little change in physical activity during this time. Levels of ill-health increased with levels of area deprivation.

B2.3 Analysis of the 2011 Census⁴⁶ reveals that urban populations in England and Wales are growing at a faster rate than rural populations. The 2011 rural population of England and Wales is estimated to have been 2.5% larger in 2011 than in 2001, whilst the urban population is estimated to have been 9% larger.

B2.4 The Welsh Government has published population projections⁴⁷ in which all National Parks are projected to see an increase in population between 2008 and 2023 with a 2% increase for the Brecon Beacons, a 1.5% increase for the Pembrokeshire Coast and a 3.5% increase for Snowdonia. The projected increase in population in National Parks in Wales is driven by in-migration from other parts of Wales and the UK. The number of deaths is projected to exceed the number of births (negative natural change) throughout the projection period and in each National Park. This is due to the older age profiles of the populations in National Parks compared to other areas. All of the National Parks are projected to see significant increases in the population aged 65 and over and a decrease in the population aged under 65. A growing, ageing population will present challenges for National Parks in terms of maintaining appropriate levels of economic activity and provision for supported housing.

B2.5 The UK Association of NPAs conducted a National Park Survey⁴⁸ in December 2012. Wales had the highest score in terms of National Parks being of greatest importance to people in the country when compared with similar results for England & Scotland. [‘National Parks are most important to those in Wales (95%)’]

⁴⁴ <http://business.wales.gov.uk/dmwales/destination-management>

⁴⁵ <http://wales.gov.uk/statistics-and-research/welsh-health-survey/?lang=en>

⁴⁶ http://www.ons.gov.uk/ons/dcp171776_337939.pdf

⁴⁷ <http://wales.gov.uk/statistics-and-research/population-projections-national-parks/?lang=en>

⁴⁸ http://www.peakdistrict.gov.uk/_data/assets/pdf_file/0018/361035/J111111-National-Parks-Survey-Draft-Report-v1.pdf

B2.6 The Well-being of Future Generations (Wales) Bill identifies a number of goals and national indicators to improve the well-being of Wales. Well-being plans will be put on a statutory basis and a Future Generations Commissioner established to act as an advocate for future generations.

B2.7 National Parks and NPAs will play a critical role on delivering well-being plans. National Parks are widely viewed as 'well-being factories' contributing a wide range of health and social benefits in an increasingly complex and pressurised world. Notwithstanding any change to their legislative basis, they already have a statutory duty to seek to foster the economic and social well-being of local communities within their boundaries and through this they promote the use of the National Parks for health and well-being in a number of different ways e.g. through Walkability⁴⁹ in the Pembrokeshire Coast.

B2.8 NPAs should therefore be given an explicit duty in respect of well-being plans. The role of the National Park Management Plan could be expanded to encompass well-being and become the de facto well-being plan for the National Park. This should have a statutory basis as does the current Management Plan. Consideration should also be given to NPAs becoming full members of Public Service Boards in order to facilitate this enhanced role on delivering well-being plans.

B3 Joining up public service delivery across sectoral boundaries – environment, health, inequality, poverty, tourism

B3.1 As well as delivering National Park purposes and the associated duty, NPAs contribute to a number of other public services, including health, inequality and poverty reduction. The links between a healthy environment and a healthy population are well-established, as are the links between a high quality environment and a healthy economy.

B3.2 With their local connections, expertise and extensive partnership networks NPAs are well placed to play a greater role on delivering a number of public services. This could entail leading, co-ordinating, supporting or advising on service delivery.

B3.3 In many cases, NPAs have supported pilot or exploratory work through their Sustainable Development Funds that has the potential to be expanded e.g. the Snowdonia NPA has supported the Cegin Bro – Bowydd and Rhiw Communities First Project, which facilitates and enables people to grow, gather, preserve and cook food for themselves and their families. This in turn will facilitate and enable people to use the above skills to be enterprising by forming micro businesses or social enterprises. The project has a particular focus on 'hard to reach' communities.

B3.4 In other cases, NPAs have adapted existing plans to take full account of new duties and responsibilities e.g. the Social Inclusion Strategy and Action Plan that the three Welsh NPAs have worked together to produce now includes the aim of contributing to the eradication of child poverty.

B3.5 The NPAs make a major contribution to a number of cross-sectoral commitments of the Programme for Government, including:

- Living within environmental limits and acting on climate change;
- Protecting healthy ecosystems;
- Creating sustainable places for people;
- Supporting the economy and business;
- Creating a sustainable, low carbon economy;

⁴⁹ <http://www.pembrokeshirecoast.org.uk/default.asp?PID=660>

- Preventing poor health and reducing health inequalities;
- More inclusive and cohesive communities;
- A thriving rural economy;
- Improving public services for rural communities;
- Widening access to our culture, heritage and sport, and encouraging greater participation;
- Strengthen the place of Welsh language in everyday life.

B4 An integrated approach to managing our natural resources

B4.1 The way in which natural resources are managed in Wales is changing and the Environment Bill will enable a joined-up approach to managing our natural resources in a sustainable and more proactive way.

B4.2 The sustainable management of our natural resources is critical to the future success of the Welsh economy and to creating a future for all of our communities. Many of the economic, social and environmental drivers that underpin our natural resources are interdependent and there are strong links between natural resource management, poverty reduction, wealth creation and improving living standards.

B4.3 We fully support the Welsh Government’s ambitions for the sustainable management of our natural resources and we are keen to play a leading role within this. We are natural leaders on this important agenda because of the diversity of natural resources that are found within our boundaries, our experience and expertise in delivering National Park purposes, the facilitative skills we have gained through our work stimulating sustainable development and our extensive connections with communities of interest, including people who live and work within our boundaries.

B4.4 As part of moves towards greater integration in reporting, NPAs should be given responsibility for including Local Natural Resource Plans for the National Parks in their National Park Management Plans. This is a logical extension of the Plans, which have delivered integrated natural resource management over the last two decades. Significantly, the National Park Management Plan is a plan for the whole of the National Park, and not just for the NPA. We believe that our long experience of integrating a number of outcomes within these plans would stand us in good stead to lead the production of Natural Resource Plans. Our accessible and transparent governance structures provide ready-made mechanisms for us to engage with key stakeholders, communities and others with an interest in natural resources. This would fit well with the role we envisage for NPAs on well-being plans as outlined in Section B2.5 of this response.

B4.5 We anticipate that our Natural Resource Plans would focus on biodiversity conservation and ecosystem function and the connection with our local economy and communities. Critically, they would set out ways in which to enhance resource resilience and diversity. Resource efficiency would also play an important part in the plans, particularly given the links to poverty reduction and job creation.

B4.6 We also see an opportunity within the Plans to explore how Payment for Ecosystem Services can be applied most effectively within the sensitive environments of National Parks. This could have huge benefits for schemes such as peatland restoration and water supplies. Public funding for peatland restoration is currently very limited, because it can only pay for the costs of restoration and any income foregone as a result of restoring the land, due to World Trade Organisation rules. Creating a market for the climate change mitigation, water and biodiversity benefits of peatland restoration could facilitate flows of private investment, which may incentivise wider uptake of restoration actions amongst the land management community in ways that are aligned with biodiversity conservation and sustainable land use.

B4.7 In order to achieve the ambition set out in Sections B5.4 and 5.5, NPAs will need to build on existing links with academic and research institutions to assist with the science, surveillance and monitoring needed to deliver this role on natural resource management effectively e.g. the Research Prospectus for the Brecon Beacons National Park sets out a range of collaborative opportunities for research institutions and NPAs.

C – Whether the current statutory purposes of designated landscapes and statutory duties on management bodies are capable of addressing the present and future challenges facing them.

C1 Are the statutory purposes adequate to meet current and future challenges?

C1.1 We consider that were they to continue un-amended, the statutory purposes and socio-economic duty would allow us to address present and future challenges to a degree, although we would be limited in what we can do. However, a revision along the lines we are suggesting in Section D of this response would allow a more comprehensive and integrated response to meeting current and future challenges and delivering long-term outcomes.

C1.2 National Parks are not static designations and have evolved over sixty years to reflect society’s needs and priorities. This evolution has allowed them to develop and grow and to bring stakeholders along in this journey of change. There is an expectation amongst our communities and key partners that further change is now necessary.

C2 The interconnectedness of the statutory purposes and the planning function

C2.1 Planning is a critical delivery tool for achieving National Park purposes and the associated duty, which we have discussed elsewhere in this response. Without an NPA planning function there would be an inconsistent approach to the management of development. The resulting lack of coherence between management and development planning would undermine the delivery of National Park purposes and the duty.

C2.2 Planning plays a vital role in ensuring that any new development is well designed and carefully sited so that it contributes to the quality of the natural environment and built heritage, as well as providing affordable homes and work places to sustain the National Park’s communities and local economy.

C2.3 The role of NPAs as the local planning authority is to facilitate and influence the appropriate development of land and buildings within its boundaries. Making the promotion of economic well-being an explicit part of the statutory purposes would allow for the more effective integration of outcomes that benefit the economy, environment and communities of the National Parks.

C3 Extending work outside the current boundaries

C3.1 NPAs can play a significant role on projects partly or wholly outside their boundaries, using their skills, expertise and networks to act as hubs for the delivery of Welsh Government priorities on sustainable development and natural resource management, including in areas without a recognised management plan or delivery focus. They are also skilled in incubating ideas that can lead to transformational change elsewhere e.g. the Brecon Beacons NPA’s role on Green Valleys (as set out in Section 4.3 of this response). These potential roles should be recognised as an explicit part of NPAs’ operating models.

C3.2 There are several ongoing examples of NPAs acting as hubs e.g. Snowdonia NPA has led a partnership between all four designated landscapes in North Wales – namely Snowdonia National Park and the Llŷn, Anglesey and Clwydian Range and Dee Valley AONBs – over the past two years, aimed at improving local businesses’ understanding of each area’s special qualities and how they can be used as marketing tools.

C3.3 This programme is funded by Visit Wales through its Partnership 4 Growth fund. The partnership is entering its second year, having completed a successful pilot year which saw all four areas work with a specialist marketing company to increase their profile in the UK holiday destination marketplace. The pilot project also included a series of business seminars aimed at providing practical information to businesses on how to reduce energy and water consumption, therefore reducing running costs and becoming more profitable by becoming more sustainable, as well as providing a marketing edge.

C3.4 The partnership’s work has been well received by businesses locally and the project has gathered considerable momentum and is regarded by Visit Wales as a blueprint for other areas in terms of public sector co-operation and successful and appropriate business engagement.

C4 Extending National Park boundaries to include marine and coastal areas

C4.1 There are currently no marine and coastal National Parks in the UK. Two of the three Welsh National Parks (Snowdonia and Pembrokeshire Coast) contain areas of coastline with their boundaries and the Pembrokeshire Coast was designated because of its outstanding and extensive coastline. The designation arrangements for National Parks in England and Wales do not currently allow for the inclusion of marine and coastal areas, as boundaries are required to end at the low mean water mark. However, in Scotland the legislation does allow for the creation of marine and coastal National Parks.

C4.2 Scottish Natural Heritage has undertaken detailed examination of marine and coastal National Parks and published detailed advice⁵⁰ which concludes that the general approach to National Parks, as it has been applied on land, is equally applicable to the coastal and marine environment. However, a number of distinct differences would need to be taken into account such as the dynamic nature of the marine environment, the different system of common and property rights and regulatory framework, the range of informal recreation activities and the growing number of pressures on the coastal and marine environment.

C4.3 We believe that it is timely to explore whether the added value that a marine and coastal National Park could bring for conservation, recreation and sustainable development justifies designation in Wales. As a first step, the Welsh Government should amend the 1949 National Parks and Access to the Countryside Act to allow for the creation in principle of marine and coastal National Parks, subject to areas meeting the designation criteria. In the short term, we anticipate that any designation would be likely to focus on extending existing National Parks into the marine environment, rather than creating a wholly new marine National Park.

C4.4 An integrated approach to managing landscapes together with their marine and coastal hinterlands would be compatible with the joined-up approach that the Welsh Government is seeking to promote on natural resource management more widely.

C4.5 A coastal and marine National Park could add value in four main ways:

C4.6 Opportunities to enhance understanding, enjoyment and care of the area – Wales’ coastal and marine environment needs integrated and sustained care and investment to retain its diversity, health and productivity. There would undoubtedly be an opportunity to

⁵⁰ <http://www.snh.org.uk/strategy/CMNP/snhadvicecmnp/default.asp>

increase enjoyment and understanding of Wales' coastal and marine environment through the better planning and provision of recreational activity and better interpretation.

C4.7 Better planning and management – a National Park is a tool for delivering more integrated planning and management of coastal and marine heritage. The National Park Management Plan would provide for stronger co-ordination of existing activities and development and for the provision for future needs.

C4.8 Social and economic benefits – a National Park will deliver social and economic benefits for the area as well as Wales more widely. The increased profile of the area would increase tourism and could be used to market local produce, goods and services. Extending the responsibility of an NPA would create employment and help support and champion existing businesses, providing tailored advice, training and funding for them to develop and diversify.

C4.9 Best practice and innovation – a National Park provides the opportunity to be innovative and to trial new approaches for the planning and management of the coastal and marine environment. A Park could be the place where options for the simplification of the regulatory framework could be tested e.g. a 'first-stop shop' through which the NPA adopts a positive role in co-ordinating the administration of the other consents required for any development proposal from marine and coastal industries.

C5 The case for Recreation Authority status

C5.1 The second statutory purpose of National Parks is to promote opportunities for the public understanding and enjoyment of the special qualities of National Parks although NPAs do not have any statutory duties in respect of the maintenance of public rights of way. In recognition of the unrivalled countryside access opportunities that public rights of way afford and their relevance in contributing to the implementation of the second statutory purpose and socio-economic duty, all NPAs engage in the management of public rights of way. This engagement takes the form of formal delegation agreements from host local authorities for the entire network of the Brecon Beacons and Pembrokeshire Coast National Parks and a partial network agreement for Snowdonia National Park. A minority of routes which are urban in character are exempt from such delegation agreements.

C5.2 There would be considerable advantage to NPAs assuming statutory responsibility for the network of public rights of way within their boundaries. It would provide a more integrated and cost effective approach to the delivery and promotion of recreational and access opportunities. A 'one-stop shop' for access within National Parks would also be more straightforward for the public and would formalise what is happening on the ground.

C5.3 In accord with such a new duty each NPA would be required to identify a recreational network of public rights of way within their National Park. The selection of routes would be done in consultation with stakeholders as this was key to the success of Rights of Way Improvement Plans. This would efficiently focus resources on a network that would typically account for the majority of routes in a National Park (80-90%) for which the NPA would thereafter assume the maintenance responsibility and powers of improvement. The network of routes thus selected could be funded either from the host local authorities or via the National Park Grant from the Welsh Government, although we recognise there would be obvious sensitivity on resourcing.

C5.4 Precedents for this include the NPAs' planning function; their role as 'Access Authorities' and 'Relevant Authorities' for Access Land under the Countryside and Rights of Way Act 2000; and their powers for the creation, diversion and extinguishment of public rights of way under the Environment Act 1995.

C5.5 The designation of Access Authorities in Scotland includes NPAs and local authorities who are required to prepare a Core Paths Plan to deliver countryside access opportunities.

C5.6 The NPAs of Wales could have the same designation, becoming responsible for developing countryside access and outdoor recreation and basically taking forward the Welsh Government's aspirations set out in its Access and Outdoor Recreation Review 2013-14.

C5.7 Integrated plans based on the recreational networks of public rights of way (outlined above) supplemented by other provisions such as permissive paths, Access Land and management agreements could be prepared to guide improvements. Increased access to inland water based on voluntary access agreements could also be included.

D – Whether new or revised purposes are necessary to improve the innovative potential of designated landscapes.

D1 History of National Park purposes

D1.1 National Park statutory purposes are the starting point for all activity within the National Parks and should express what society needs from these areas; after all they have been designated to provide public benefit as well as to protect important areas of countryside. The purposes must be long-term, clear and not open to wide interpretation.

D1.2 **We believe that the time has come for a fresh look at National Park purposes.** To inform their contemporary relevance, it is important to consider briefly the history of the purposes and how they have evolved over the last 60 years, as well as the key policy drivers and challenges outlined in Section B of this response.

D1.3 The purposes have their origin in the Dower⁵¹ and Hobhouse⁵² Reports of 1945 and 1947 respectively, which recommended that:

A national park should be an extensive area of beautiful and relatively wild country in which, for the nation's benefit: a) the characteristic landscape beauty is strictly preserved, b) access and facilities for public open air enjoyment are amply provided, c) wildlife and buildings and places of architectural and historic interest are suitably protected, and d) established farming use is effectively maintained.

D1.4 The Government broadly accepted the logic of Dower and Hobhouse and set the purposes for National Parks in the 1949 National Parks and Access to the Countryside Act as:

- (i) preserving and enhancing the natural beauty of National Parks, and
- (ii) promoting their enjoyment by the public.

D1.5 Within the Act natural beauty was defined as including natural features, fauna and flora.

D1.6 The 1968 Countryside Act modified the definition of natural beauty by substituting: 'conservation' for 'preservation'; and 'geological and physiographical features' for 'natural features'. It also placed a duty on public bodies to have due regard to the social and economic interests of the local community.

D1.7 In the 1970s, the Sandford Review introduced the Sandford Principle, which provided a management tool to reconcile public enjoyment with conservation, ensuring that in cases of conflict the first (conservation) purpose would prevail.

⁵¹ John Dower, 'National Parks in England and Wales', Cmd 6628, HMSO, London, May 1945

⁵² Hobhouse, Report of the National Parks Committee (England and Wales), 1947

D1.8 In the 1990s, the Edwards Report recommended revised first and second purposes:

- (i) protect, maintain, and enhance the scenic beauty, natural systems and land forms, and the wildlife and cultural heritage of the area, and
- (ii) promote the quiet enjoyment and understanding of the area, insofar as it is not in conflict with the primary purpose of conservation

D1.9 It rejected calls for a third socio-economic purpose but recommended that NPAs should support the appropriate agencies in fostering social and economic well-being of the communities within the National Park in ways which are compatible with the purposes for which National Parks are designated.

D1.10 The Government largely accepted the recommendations of the Edwards Report and revised the purposes through the 1995 Environment Act to:

- (i) conserving and enhancing the natural beauty, wildlife and cultural heritage; and
- ii) promoting opportunities for the understanding and enjoyment of the special qualities of these areas by the public

D1.11 It also enacted the Sandford Principle and updated the socio-economic duty so that NPAs should seek to foster the economic and social well-being of local communities within the National Parks, but without incurring significant expenditure in doing so.

D1.12 In 2006 the Natural Environment and Rural Communities Act 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. This followed a legal case involving a challenge to the designated New Forest National Park boundary. The 2006 Act also removed the expenditure constraint on the NPAs' socio-economic duty.

D1.13 This brief examination shows that National Park purposes have evolved over a long period of time, and that they have been updated and clarified to make them more relevant to the needs of society. We now believe that further revisions to the purposes are necessary, enabling NPAs to play a fuller part in securing Wales' future prosperity.

D2 Purpose 1

D2.1 Current Purpose 1

- To conserve and enhance the natural beauty, wildlife and cultural heritage

D2.2 Recommended Purpose 1

- **To conserve and enhance the landscape, nature and cultural heritage of the area**

D2.3 Justification for change

D2.31 Natural beauty is an important term in the history of designating National Parks, but despite legal definitions and clarifications, it lacks public meaning and is confusing due to its all-encompassing nature (the definition of natural beauty includes wildlife and cultural heritage). Landscape is a generally better understood and more accessible term, with an international context provided by the European Landscape Convention (ELC).

D2.32 Landscape was previously considered too vague a term for legislation. However, this position has now changed with the clarity provided by the ELC e.g. Natural England's

purpose⁵³ includes conserving and enhancing the landscape, whilst that of its predecessor bodies did not.

D2.33 However, before natural beauty is replaced by landscape, we recommend that an impact assessment is undertaken to consider the potential implications for the process of designating and reviewing National Park boundaries, so that any unintended consequences are identified and considered. Bodies such as Natural England should be consulted, as it has extensive recent experience of the application of the concept of natural beauty through its work on National Park designation and boundary reviews. Similarly, the Strategic Planning Group within Natural Resources Wales will be able to draw on its experience, based on its work on the Clwydian Range and Dee Valley AONB Designation Orders.

D2.34 The conservation of biodiversity is a national and international priority. The crucial commitment for Wales is to meet the EU Biodiversity Strategy and Aichi Target commitments, i.e., to stop biodiversity from declining by 2020 and to achieve recovery by 2050. The Welsh Government's Strategic Grant letter⁵⁴ to Welsh NPAs identified biodiversity as a priority objective. Welsh NPAs are required⁵⁵ by the Welsh Government to achieve net enhancements to biodiversity whenever and wherever possible. The distinctive biodiversity of Wales' National Parks is referred to explicitly in the Welsh Government's Environment Strategy for Wales⁵⁶.

D2.35 Reflecting the importance of biodiversity in the purposes is therefore essential. We prefer the term 'nature' as this has a specific meaning, which is broader than but includes biodiversity.

D2.36 All of the terms within the revised first purpose (landscape, nature and cultural heritage) should be defined on the face of the Act.

D2.37 This purpose would allow National Parks to contribute to the delivery of a number of long-term outcomes, including:

- A high quality, biodiverse natural environment with clean air, water, land and sea;
- Enhanced wildlife and landscapes, with a thriving, distinctive character that support the development of Wales
- A society that promotes and protects culture, heritage and the Welsh language.

D3 Purpose 2

D3.1 Current Purpose 2

To promote opportunities for the understanding and enjoyment of the special qualities of the area by the public

D3.2 Recommended Purpose 2

To promote the social well-being of the area's local communities and opportunities for the public to understand, enjoy and benefit from its special qualities

⁵³ Section 2(2), 2006 Natural Environment and Rural Communities Act

⁵⁴ Letter to the Chairs of the 3 NPAs, 10 May 2013

⁵⁵ Technical Advice Note 5 (Nature Conservation and Planning (Welsh Government , 2009)

⁵⁶ Environment Strategy for Wales (Welsh Government, 2006)

D3.3 Justification for change

D3.31 The proposed revision would clarify the role of NPAs in contributing to national goals for the social well-being of their local communities and beyond. National Park designation is anchored in public use and accessibility, which, in our view, should still form an explicit part of this purpose, although we suggest adding 'benefit' to make the role of National Parks in areas such as health improvement more explicit. The continued reference to special qualities is important as that allows each NPA to define why the area is special and to brigade policy and management resource accordingly⁵⁷.

D3.32 Guidance should be provided on this purpose, identifying the key activities to be undertaken, including:

- promoting choices and behaviours that maximise people's physical and mental well-being;
- providing and improving access and recreational opportunities;
- encouraging people to participate in cultural, sports and recreational activities.

D3.33 This purpose would allow National Parks to contribute to the delivery of a number of long-term outcomes, including:

- Increased access to the natural environment for all sectors of society;
- A society in which people's physical and mental well-being is maximised, health inequalities are reduced and in which choices and behaviours that benefit future health are understood;
- People are safe, enjoy and benefit from our natural resources and understand their relevance in their day to day lives;
- A society which encourages people to participate in the arts, and sports and recreation.

D4 Case for a Socio-Economic purpose

D4.1 The relationship between National Park purposes and the duty to seek to foster economic and social well-being of local communities is set out in legislation. The duty must be pursued through the purposes and in co-operation with local authorities and public bodies whose functions include the promotion of economic or social development within the area of the National Park.

D4.2 Over the years, there have been several calls for a socio-economic purpose for National Parks, including in Wales. In reality, and through their implementation of the existing socio-economic duty, the NPAs have encompassed a broad range of economic and social outcomes in their work, including in areas that are not traditionally seen as falling within the responsibility of National Parks such as poverty alleviation and stimulating the growth of the green economy. Whilst these activities are all entirely compatible with the achievement of National Park purposes, this has provoked criticism from some that NPAs are acting outside their responsibilities.

D4.3 A growing number of projects supported by NPA Sustainable Development Funds relate to social and economic outcomes, highlighting the appetite amongst National Park communities for such interventions from NPAs e.g. in the last year the Snowdonia NPA has used its Sustainable Development Fund to support projects on respite care provision for

⁵⁷ e.g. http://www.nationalparks.gov.uk/learningabout/whatisanationalpark/specialqualities/special_qualities_pc

people with learning difficulties, skill development in the green economy, local food growing and harvesting and an activity-based father and children support group.

D4.4 The socio-economic role of National Parks was last considered in the 2004 Welsh National Parks Review. This recommended that a sustainable development purpose should be introduced which would promote socio-economic development that actively supported National Park purposes:

- promoting sustainable forms of economic and community development which support the conservation and enhancement of the natural beauty, wildlife and cultural heritage of the areas

D4.5 The recommendation was not accepted by the Welsh Government. It was also rejected by local authorities who thought that this could interfere with their own responsibilities for local communities and the local economy, and attracted a nervous reaction from civil society organisations who were worried that it would undermine the other purposes.

D4.6 Since 2004, there have been two major changes to the context in which this issue should be considered. Firstly, sustainable development has become an imperative and all public bodies in Wales, including NPAs, are now required to make it their central operating principle. Secondly, there will be continued major financial challenges to the local authority network in Wales requiring them increasingly to focus on their existing statutory responsibilities. Furthermore, a significant reduction in numbers is likely, as recommended by the Commission on Public Service Governance and Delivery. With their clear geographical remit and strong local networks, NPAs are therefore now in pole position to work with their local communities on economic and social development issues. **We believe that this legislative change would both formalise the actual position and allow us to contribute fully to achieving sustainable development goals.**

D4.7 Recommended wording of new socio-economic purpose:

- **To promote the sustainable economic well-being of the area's communities, in ways that they benefit from and safeguard the special qualities of the area**

D4.8 We prefer 'promote' to 'seek to foster' as this is a more active and stronger construction. We think that the link to our local communities is important and should be retained to provide clarity and reassurance that National Parks should not be promoting economic development which will not have a demonstrable benefit for local people. In Section D6, we suggest a mechanism through which any potential conflicts between the purposes can be resolved.

D4.9 The Welsh Government should provide guidance on this new purpose so that there is common understanding of how we will pursue it.

D4.10 This purpose would allow National Parks to contribute to the delivery of a number of long-term outcomes, including:

- Attractive, viable, safe and well connected communities;
- A society that enables people to fulfil their potential no matter what their background or circumstances;
- An advanced and innovative economy, with clear links to the special qualities, which generates wealth and provides employment opportunities for local communities;

- A reduction in poverty through improved community participation in environmental projects in deprived areas;
- National Park communities are able to access high quality employment, affordable housing and public services, supported by effective infrastructure including communications, transport and utilities.

D4.11 The enhanced role for NPAs on preparing and delivering well-being plans (as we have outlined in Sections B2.6 and B2.7 of this response) would be a key delivery mechanism for achieving both this new purpose and revised purpose 2.

D5 Case for a Natural Resource purpose

D5.1 The landscapes of the National Parks are well known for providing breathtaking scenery, diverse wildlife and a range of opportunities for public recreation. However, they are less recognised for the role that they play in providing other vital natural resources for society, such as clean water, natural flood defences and carbon storage.

D5.2 We believe that there should be explicit recognition within our purposes of the role that National Parks play in the provision of supporting, provisioning and regulating ecosystem services and that this would have important and beneficial implications for our status and management.

D5.3 The Scottish National Parks have an aim ‘to promote sustainable use of the natural resources of the area’. Whilst this is a good starting point for discussion, in our view it is far reaching enough to enable us to play the role that we envisage is needed to help the Welsh Government to achieve the step change in the sustainable management of our natural resources that it is seeking.

D5.4 In Section B of this response we highlighted the practical way in which we believe NPAs can support a more integrated approach to natural resource management. **As well as taking responsibility for Local Natural Resource Plans, we consider that a new purpose will provide NPAs with a clear steer for the longer term.** This in turn will provide the impetus that is needed to move forward on securing the nationally important goals of resource efficiency, diversity and management, a low carbon and green economy, ecological resilience and healthy, functioning ecosystems. The new purpose would also help to raise public awareness about the importance of National Parks in providing these vital goods for society.

D5.5 Recommended wording of new natural resource purpose

- **To promote the sustainable maintenance, enhancement and use of the natural resources and ecosystems of the area**

D5.6 A definition would need to be included for sustainable e.g. that set out in the 2013 consultation document ‘Towards the Sustainable Management of Wales’ Natural Resources’:

Sustainable means: (i) With a view to benefitting, and (ii) In a manner designed to benefit, the people, environment and economy of Wales in the present and in the future

D5.7 Implicit within the new purpose is recognition that natural resources underpin the economy and the health and well-being of society as well as the natural environment and that their true value should be properly factored in to decisions.

D5.8 This purpose would allow National Parks to contribute to the delivery of a number of long-term outcomes, including:

- A biodiverse natural environment with healthy functioning ecosystems that support social, economic and ecological resilience and the capacity to adapt to change;
- Healthy and resilient natural resources managed efficiently for Wales' long-term economic, social and environmental benefit;
- Wales' natural resources support the creation of enduring and high quality business opportunities and jobs.

D6 How will the revised and new purposes relate to each other?

D6.1 Whilst the revised purposes as proposed will be equal in law, there is a need to establish a mechanism through which any conflicts between them can be resolved. At present, the Sandford Principle exists to manage conflicts between the existing two purposes, with the first purpose prevailing in cases of irreconcilable conflict. It does not extend to the socio-economic duty as the duty is currently regarded as subservient to the purposes. In practice, the principle is rarely invoked and is treated as a principle of last resort, largely due to NPAs' skills in management, co-operation, negotiation and mediation.

D6.2 If new purposes are adopted which include meeting social and economic needs, there is a strong case for adopting the Scottish model in which a version of the Sandford Principle is enshrined in the legislation and applies to all of the purposes. In cases of conflict, priority is given to the first (conservation) purpose.

D6.3 Such an extended conflict resolution mechanism would also be necessary if NPAs are to retain their international standing as IUCN Category V Protected Landscapes. The IUCN has recently redefined protected areas as places in which priority is given to protecting nature. In 2012, the Welsh NPAs prepared a statement setting out how they complied with this new definition, which relied heavily on the Sandford Principle in demonstrating the pre-eminence of nature protection. **Without an equivalent and broader tool the IUCN would be unlikely to continue to recognise National Parks as protected areas, which could have a major detrimental impact on our international reputation and branding.**

D6.4 Recommended conflict resolution tool

- **If it appears, in any matter, that there is a conflict between the purposes, relevant authorities shall give greater weight to the conservation and enhancement of the landscape, nature and cultural heritage of the area.**

D7 Summary of recommended new purposes

- **To conserve and enhance the landscape, nature and cultural heritage of the area**
- **To promote the social well-being of the area's local communities and opportunities for the public to understand, enjoy and benefit from its special qualities**
- **To promote the sustainable economic well-being of the area's communities, in ways that they benefit from and safeguard the special qualities of the area**
- **To promote the sustainable maintenance, enhancement and use of the natural resources and ecosystems of the area**

If it appears, in any matter, that there is a conflict between the purposes, relevant authorities shall give greater weight to the conservation and enhancement of the landscape, nature and cultural heritage of the area.

E – Examples of innovative statutory/legislative purposes and/or aims of designated landscapes outside Wales.

E1 Category V protected landscapes

E1.1 The National Parks and AONBs are Category V protected landscapes within the IUCN's classification⁵⁸ of protected areas. Whilst there are a number of other areas within this category globally, the protected landscapes within the UK are leaders within this sphere of protected area management because of their long history, experience in integrating different management outcomes and policy expertise. Below we highlight five contrasting approaches of protected areas.

E2 The purpose of National Parks in New Zealand

E2.1 National Parks in New Zealand are Category II National Parks, the main objective of which is to protect functioning ecosystems. New Zealanders look on these places as priceless areas representing their natural and historical and cultural heritage, and as part of the nation's birthright which must be protected for future generations to treasure and enjoy. This expectation is expressed in the National Parks Act 1980⁵⁹:

'...the provisions of this Act shall have effect for the purpose of preserving in perpetuity as national parks, for their intrinsic worth and for the benefit, use, and enjoyment of the public, areas of New Zealand that contain scenery of such distinctive quality, ecological systems, or natural features so beautiful, unique, or scientifically important that their preservation is in the national interest.' (section 4(1), National Parks Act 1980)

E2.2 The innovative aspect of this statutory purpose is that it aims to preserve National Parks in perpetuity for their intrinsic worth as well as more conventionally for the benefit, use and enjoyment of the public. The Act requires a balance to be struck between the dual requirements of 'preservation in perpetuity' and 'public access and enjoyment'. However, greater emphasis is given by the Act to preservation aspects.

E2.3 Whilst the strict requirements of this designation would not be applicable to protected landscapes in Wales, the references to 'in perpetuity' and 'intrinsic worth' are worth highlighting.

E3 French Regional Nature Parks (Les Parcs Naturels Régionaux)

E3.1 The regional nature park system⁶⁰ was established in France in 1967 in response to the need for a flexible framework for conservation and development. Regional nature parks are classified as Category V protected areas.

E3.2 The purpose of a regional natural park is to protect and promote natural resources, human resources and cultural heritage by implementing an innovative and environmentally-friendly policy of land-use planning and economic, social and cultural development. A regional nature park area is classified by law (for ten years, renewable) by the Ministry of Environment.

⁵⁸ http://www.iucn.org/about/work/programmes/gpap_home/gpap_quality/gpap_pacategories/gpap_category5/

⁵⁹ <http://www.legislation.govt.nz/act/public/1980/0066/latest/DLM36963.html>

⁶⁰ <http://www.parcs-naturels-regionaux.tm.fr/en/parc.UK2.pdf>

E3.3 The roles⁶¹ of a regional nature park are:

- To protect and manage natural resources, landscapes and cultural heritage;
- To participate in land-use planning;
- To foster economic and social development;
- To provide education and information;
- To encourage experimentation.

E3.4 A significant disadvantage of this model is its potentially uncertain tenure.

E4 Danish National Parks

E4.1 Denmark is the most recent European country to designate National Parks, through the 2007 National Park Act⁶². Danish National Parks hold some of Denmark's most unique and valuable nature areas and landscapes. People live and work in the Danish National Parks and parts of the National Parks are privately owned. Danish National Parks may cover both land and sea.

E4.2 Section 1 of the Act sets ten objectives for the establishment of National Parks:

- Create and ensure large connected natural areas and landscapes of national and international significance;
- Conserve and strengthen the quality and diversity of nature;
- Ensure continuity and options for free dynamics in nature;
- Conserve and strengthen scenic and geological values;
- Conserve and raise awareness of the cultural and historic values and the biodiversity of the cultural landscape;
- Support research and education in the value of these areas;
- Promote opportunities for the public to use and enjoy nature and the landscape;
- Strengthen the dissemination of knowledge about the values and the development of the areas;
- Support a development that benefits the local community, including the business community, while respecting protection interests;
- Promote awareness of the values of the areas by involving the public in establishing and developing the National Parks.

E4.3 Although the ten objectives are considered equally important, according to the explanatory memorandum the main objective of the Act is to strengthen and develop nature, including the connection of large connected natural areas.

E4.4 These purposes have a contemporary feel and reflect current thinking on nature and natural landscapes, valuing protected areas, engaging the public and community benefit.

E5 Scottish National Parks

E5.1 It is considered that the most relevant Category V protected landscape purposes for the Review to consider are those of the National Parks in Scotland. The Scottish model offers an evolution of the current system of purposes and duty that we believe would be appropriate in the Welsh context, albeit with some modifications.

⁶¹ Defined by article R333-1 of the French Environmental Code

⁶² <http://uk.rigsrevisionen.dk/media/1984500/6-2013.pdf> and <http://danmarksnationalparker.dk/english/>

E5.2 National Parks in Scotland have four aims⁶³:

- 1(a) to conserve and enhance the natural and cultural heritage of the area;
- 1(b) to promote sustainable use of the natural resources of the area;
- 1(c) to promote understanding and enjoyment (including enjoyment in the form of recreation) of the special qualities of the area by the public; and
- 1(d) to promote sustainable economic and social development of the area's communities.

E5.3 Section 9(6) of the Act provides a conflict resolution mechanism for NPAs which, in cases of conflict, ensures that priority is given to aim 1(a) conserving and enhancing the natural and cultural heritage of the area.

E5.4 Aims 1(b) and 1(d) relate to areas on which the NPAs in Wales are keen to play a fuller part – natural resource management and sustainable development.

E5.5 The NPAs believe that the existing National Park purposes and duty provide a good basis for evolutionary change. We have set out in Section D of this response how we think Scottish-type purposes could be made applicable in 21st Century Wales.

⁶³ <http://www.legislation.gov.uk/asp/2000/10/section/1>

Question 2 – Should there be a single designation of protected landscape in Wales?

F – The specific merits, advantages and disadvantages in the current “two tier” system of statutory landscape designation since in certain respects the two existing designations are virtually indistinguishable.

F1.1 The most significant advantage of retaining separate designations is the protection of the well-established brand value of National Parks. The 2013 ARUP study⁶⁴ concluded that National Park status is important beyond the level of environmental protection it affords. The National Parks are recognised by Visit Wales and others as some of Wales’ most important tourism brands, contributing positively to Wales’ image domestically and internationally.

F1.2 The National Park brand is used to promote the whole of Wales and the economic benefits of this are felt well beyond National Park boundaries. The label ‘National Park’ marks out an area as ‘special’ and confers on the Parks a level of visibility that is not matched by other environmental designations. Losing this could have major implications for the market reach of National Parks and their contribution to the Welsh economy.

F1.3 Loss of the National Park designation would also be likely to have a major impact on the public. People have a good awareness of the Welsh National Parks, with nearly three quarters of the population of Wales making a visit to a National Park each year.

F1.4 A significant advantage of National Park designation is the stable funding and management arrangements that are attached to it. Whilst these arrangements will be subject to more detailed analysis under Stage 2 of the Review, it is a significant difference between National Parks and AONBs and should be highlighted here.

F1.5 The time and cost to create a new designation and undertake the de-designation of the existing National Parks and AONBs would be substantial and in our view it would not be in the public interest to proceed with such an exercise.

F1.6 A recent Freedom of Information request⁶⁵ reveals the high costs involved in work involving the designation process for protected landscapes. In this instance, the cost of a public inquiry into revising part of the boundary of two National Parks in northern England was £122,360. This excludes staff costs and the costs incurred by Natural England, which are likely to be substantially more than this, as it had worked on the review process for a number of years before the inquiry was held.

F1.7 The creation of a single designation would also raise major implications for local distinctiveness and local accountability. One of the underpinning success factors of National Parks and AONBs is their local responsiveness, expertise and networks. Any centralisation of the designation arrangements would be likely to undermine this.

⁶⁴ Valuing Wales’ National Parks, ARUP, September 2013

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

⁶⁵ https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/365548/FOI_6906_16Oct14_amended.pdf

G – Whether a single designation could optimise the use of resources and scarce expertise; contribute to greater efficiencies and improve collaboration and coordination across Wales whilst maintaining the protection currently afforded to these landscapes.

G1.1 The NPAs fully support goals to optimise the use of scarce resources and expertise. However, we consider that there are ways to achieve this without combining National Parks and AONBs into a single designation. National Parks and AONBs are natural partners and have much to learn from each other. We believe that there is scope for more collaboration whilst retaining local ownership and local management.

G1.2 The initiative highlighted in Section C3 of this response demonstrates how collaboration between NPAs and AONB management organisations can and does take place in practice. Snowdonia NPA has led a partnership between all four designated landscapes in North Wales – namely Snowdonia National Park and the Llŷn, Anglesey and Clwydian Range and Dee Valley AONBs – over the past two years, aimed at improving local businesses’ understanding of each area’s special qualities and how they can be used as marketing tools. This has worked well and produced tangible results for local businesses as well as resource savings for the management organisations involved.

G1.3 Care should be taken when planning collaborative activity to ensure that it is delivering added benefit to the work of the individual organisations, that resource savings are secured and that other factors such as geography are taken into account. This is also relevant when considering whether shared services would be an appropriate way forward e.g. there would be little point and certainly no resource saving were say the Wye Valley AONB and Snowdonia NPA to consider sharing the services of an ecologist, due to the large distance between the two designations. Sharing of some services would make much more sense for those designations that are in proximity to each other and have an identified need for such a service in the first place.

G1.4 The NPAs consider that the Review offers a good opportunity to advance a more sophisticated approach to securing greater efficiencies and collaborative working between NPAs and AONB management organisations. As part of this, we would welcome an enhanced role for Natural Resources Wales in joining us in driving collaboration between the protected landscapes. The approach should take account of the potential for service sharing and collaborative working with local authorities, which the NPAs already do in a great number of ways. The importance of local and national collaboration between NPAs and AONBs is recognised in this video of a presentation⁶⁶ the Yorkshire Dales NPA chief executive gave to the 2014 AONBs national conference and on the website⁶⁷ of the National Association for AONBs. An example of current joint working between NPAs and AONBs can be seen through the nomination of Pembrokeshire Coast NPA’s Culture and Heritage Manager to represent Designated Landscapes (i.e. both NPAs and AONBs) on the Welsh Government’s Historic Environment Group.

G1.5 We propose a matrix of possible collaborative and joint working activity, which can be fitted to local circumstances as required. These include:

- Shared or joint services;
- Geographical groupings of designated landscapes – e.g. the Snowdonia NPA and three AONBs in North Wales have met to discuss a voluntary approach to their work (this was instigated prior to the consultation being mooted). Consensus has been reached on the principle of joint work on a number of areas of activity, including:

⁶⁶ <http://www.landscapesforlifeconference.org.uk/2014/07/collaboration-on-a-local-and-national-level-david-butterworth-yorkshire-dales-npa/>

⁶⁷ <http://www.landscapesforlife.org.uk/collaboration.html>

- Use of volunteers – improving the offer and the base of volunteers;
 - Staff development – exchange/shadowing;
 - Policy – development e.g. supplementary planning guidance;
 - Responses to consultation documents;
 - Education – improving the offer;
 - Heritage/culture – sharing good practices and themes;
 - Events – sharing good practice;
 - Agri-environment schemes – Glastir;
 - Press and media management;
 - Health and well-being.
- A federal approach to collaboration in which protected landscapes come together for strategy, policy development and other high level work, whilst retaining independence locally;
 - A unified approach to the delivery of shared outcomes on conservation, well-being and natural resource management. This could be achieved through a unified management plan with high level national indicators or through common monitoring, reporting and performance management frameworks for shared high level outcomes;
 - Portfolio approach in which specified organisations lead different workstreams, e.g. on maximising contributions to ecosystem services or the role of designated landscapes in health promotion.

G1.6 In practice, a combination of these methods is likely to be needed. In order to be meaningful collaboration needs capacity, so the maintenance of funding for protected landscape management bodies is likely to be directly proportionate to their ability to collaborate effectively with each other.

H – The implications for national and international standards concerning landscape and conservation of a single designation.

H1 Implications for conservation standards

H1.1 A single designation *per se* would not necessarily have any implications for national and international conservation standards. However, the statutory purposes and underpinning legislation of a single designation could have a major bearing on these.

H1.2 The IUCN has recently redefined protected areas as places in which priority is given to protecting nature. Any new designation would have to produce a statement demonstrating whether the designated sites complied with this IUCN definition. These statements should review all relevant legislation focusing on the priority given to nature conservation in the long-term.

H1.3 Statements should also provide an overview of the single designation's current management objectives, in particular in relation to prioritising nature conservation, and summarise examples of current management practice that demonstrate the priority given to nature conservation, and the ambition and vision for nature conservation in the future. In addition to reviewing legislation or policy in relation to the IUCN definition of a protected area, Statements of Compliance can also assign sites to IUCN management categories and governance type. Where this is done, supporting evidence should be provided.

H1.4 If any new designation failed to demonstrate compliance with the IUCN's definition of a protected area, then the designation would not be recognised as a protected area and would not be assigned a management category and associated governance type⁶⁸.

H1.5 National Parks and AONBs are currently classified by the IUCN as Category V protected landscapes. Loss of this status would have a major impact on their international standing and reputation.

H2 Implications for landscape standards

H2.1 The general measures of the European Landscape Convention require parties to:

- (a) recognise landscapes in law as an essential component of people's surroundings, an expression of the diversity of their shared cultural and natural heritage, and a foundation of their identity;
- (b) establish and implement landscape policies aimed at landscape protection, management and planning through the adoption of the specific measures set out in Article 6;
- (c) establish procedures for the participation of the general public, local and regional authorities, and other parties with an interest in the definition and implementation of the landscape policies mentioned in paragraph b above;
- (d) integrate landscape into its regional and town planning policies and in its cultural, environmental, agricultural, social and economic policies, as well as in any other policies with possible direct or indirect impact on landscape.

H2.2 The Convention was signed by the UK government on 24 February 2006, ratified on 21 November 2006 and became binding on 1 March 2007.

H2.3 Any new designation would need to take account of these measures and landscape would need to be recognised in the statutory purposes in order to meet the requirements of measure (a).

I – The experience you or your organisation has had with one or both designations.

I1.1 The NPAs have co-operated with the five AONBs in Wales for many years and have amassed a great deal of experience in working with both designations, including through the Protected Landscapes Network which is co-ordinated by Natural Resources Wales. At a national level, National Parks Wales and the National Association for AONBs share thinking and exchange knowledge on policy and legislative issues. Members of NPAs and AONB management organisations share learning through attending annual conferences and training seminars. Officers collaborate on joint projects and initiatives and undertake fact-finding visits to each other's areas.

I1.2 In our view, third parties are well placed to offer insight and views to the panel on this issue, as they have gained experience of the designations through a number of different channels including partnership working, grant aid and consultation exercises, and many will have been involved with the designations for a significant period of time.

⁶⁸ Dudley, N (Editor) (2008) Guidelines for Applying Protected Area Management Categories. Gland, Switzerland: IUCN. X + 86pp. <http://data.iucn.org/dbtw-wpd/edocs/PAPS-016.pdf>
IUCN NCUK (2012); Putting nature on the map – identifying protected areas in the UK: A handbook to help identify protected areas in the UK and assign the IUCN management categories and governance types to them, IUCN National Committee for the United Kingdom, UK
<http://www.iucn-uk.org/Portals/0/PNOTM%20Final%20January.pdf>

J – Examples of designation alignment outside Wales and lessons to be learned.

J1.1 Best practice between protected landscapes in Europe is shared through the Europarc Federation⁶⁹. Our initial enquiries of the Federation have not revealed any relevant experience of designation alignment but the following examples may be worthy of further investigation.

J1.2 In Germany, the Nationale Naturlandschaften (National Natural Landscapes) brand⁷⁰ was created to bring the three main German designations of National Parks, nature parks and biosphere reserves together under one umbrella. However, this did not change the underlying legal basis of the designations. There are more than a hundred National Natural Landscapes in Germany and all share the common objective of protecting and conserving nature and offering visitors opportunities to experience it.

J1.3 Prior to the creation of the South Downs National Park, two AONBs existed within the area – the Sussex Downs and East Hampshire AONBs. Most of the area within the AONBs was included within the National Park boundary, although the area of the National Park itself was wider than the AONBs in recognition of the different designation criteria and the changes that had taken place since the original AONB designations were made. A few small areas of the AONBs were not included within the National Park boundary and were de-designated due to the landscape degradation that had taken place. The designations team within Natural England may be able to offer insight into any lessons to be learnt from the designation and de-designation exercise.

J1.4 Natural England's Designations Strategy does not propose any alignment of protected landscapes. The process of merging of England's sole Marine Nature Reserve (Lundy) into the Marine Conservation Zone series may be worthy of further investigation.

⁶⁹ <http://www.europarc.org/home/>

⁷⁰ <http://www.nationale-naturlandschaften.com/>

List of annexes

Annex 1

Valuing Wales' National Parks. ARUP. August 2013

Annex 2

Delivery of Planning Services in Statutory Designated Landscapes in Wales. Summary Report from Phase 1. Prepared for the Welsh Government by Land Use Consultants. August 2011