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Dear Ms Westlake

Sustaining a Living Wales – A Green Paper on a new approach to natural resource management in Wales

Introduction

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

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

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

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

In Wales, National Parks comprise about 20% of the country's land mass and therefore have a vital role to play in sustainable development. They already contribute significantly to the well-being of the nation, through protection of the landscape, wildlife and key environmental resources and services, like water provision and carbon storage in peat soils and forests, which can mitigate the effects of climate change.

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

CNP is pleased to have this opportunity to respond to the Welsh Government's consultation on a new approach to the management of Wales's natural resources. This response complements and should be read in conjunction with our recent response to the consultation on Natural Resources Wales which closed on 3 May 2012. Many of the concerns we raised in response to that consultation also apply to this Green Paper.

CNP supports the development of a Natural Environment Framework (NEF) and the move to an ecosystem approach to environmental regulation and management. However, this must take proper account of all the important aspects of natural resources, including the use of land and sea for recreation and the natural beauty and cultural heritage which National Parks and Areas of Outstanding Natural Beauty exist to protect.

However, CNP would like to raise a number of concerns about the proposals in the Green Paper, which can be summarised as follows:

1. Insufficient recognition of the vital contribution that National Parks make to sustainable development in Wales, and the potential they offer to enhance the delivery of critical ecosystem services.
2. A lack of reference in the proposals to a role for landscapes and seascapes in providing a framework for planning and managing natural resources.
3. The fact that existing mechanisms such as National Park Management Plans have not been taken into account in the proposals for local resource management planning.
4. The need to recognise the benefits of a quality environment that can not be easily quantified.
5. The need for a clear definition of sustainable development.
6. The importance of active and continuous engagement with all sectors of society including communities, voluntary organisations, community and local councils, public bodies, private sector businesses and regulatory bodies.

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

1. Insufficient recognition of National Parks

CNP is pleased that the Green Paper recognises the value of existing designations and their success in conserving Wales' 'highest quality landscapes'

(page 7). However, we are concerned that the section on designations which starts on page 21 implies a need to review and reconsider these designations. **It is critical that existing environmental protection is not weakened and eroded by unnecessary rationalisation and we do not believe that the Green Paper provides any evidence to justify such a review.**

The Green Paper also fails to recognise that National Parks and AONBs are essentially enabling designations that recognise environmental constraints and approach them in an integrating way. National Parks are managed in a way that ensures that they contribute to sustainable development. They make a significant contribution to protecting the environment, as well as to the economy and the health and well-being of the nation. The development of the NEF is an opportunity to ensure that the resources of National Parks are used effectively in the management of ecosystem services and CNP wants to see the value of Welsh National Parks - in terms of their existing and potential environmental, economic and social benefits - embedded strategically across all relevant policy areas.

2. Lack of reference to landscapes and seascapes

National Parks and AONBs contain Wales' finest landscapes. Landscapes are resources in their own right and represent a diverse combination of natural features and forms, spaces, habitats and experiences which are expressed through a unique legacy of inherited human traditions, skills and endeavour.

In addition, the protected landscapes of Wales that are on the coast – Pembrokeshire and Snowdonia National Parks and the Anglesey, Gower and Llyn AONBs – all derive many of their special qualities from the marine environment and from their association with it. This means that the proposals must give full recognition to the role of landscapes and seascapes in providing a framework for planning and managing natural resources.

It is notable that the document does not refer at all to the European Landscape Conventionⁱ which was signed by the UK Government in February 2006 and became binding from March 2007. This convention, created by the Council of Europe, promotes landscape protection, management and planning, and European co-operation on landscape issues. It applies to all landscapes, towns and villages, as well as open countryside; the coast and inland areas; and ordinary or degraded landscapes, as well as those that are afforded protection. CNP considers this a serious omission and a missed opportunity.

The NEF offers an opportunity to ensure that the distinctive character of all Wales' landscapes and seascapes, some of our greatest social and economic assets, will continue to be cared for in a way which future generations will thank us for. However, this will only be achieved if the significance, value and role of Welsh landscapes and seascapes is fully recognised in the new approach.

3. Lack of recognition for existing mechanisms such as National Park Management Plans

CNP supports the proposal for a National Resource Management Plan which provides a framework for local natural resource planning in Wales.

CNP also welcomes the intention to integrate with, rather than add to, existing management plans and to provide context for regulatory and development planning decisions. However, we are concerned that there is no mention of the need to take maximum advantage of existing partnerships and arrangements, such as the statutory management plans, which are already prepared by each National Park and AONB. As these designations cover 25% of Wales' land area, these management plans would be an excellent starting point for developing local resource plans as they play an important role in development management and already address many of the issues that would need to be covered. We would like to see the scope of these plans extended to cover all natural resources and activities.

CNP believes that both the National and Local Resource Management Plans should be given statutory status and, if they are to be statutory, it is even more important that they build on existing arrangements to avoid confusion or duplication of effort.

CNP notes that resource planning is to be piloted locally. Any of the National Parks in Wales would provide an ideal test-bed for developing an integrated approach to the planning and management of natural resources.

4. Recognising the true value of the environment

CNP appreciates the acknowledgement that our environment has an intrinsic value that cannot be quantified. However, it is important to recognise that this value can not be considered purely in economic terms. It is very difficult to put a price on some aspects of the natural environment and the benefits it offers. In National Parks, adverse changes to the stunning natural beauty of the landscapes, the feeling of wildness and escape, or the deep-rooted cultural heritage, are notoriously difficult to cost. It is essential that these kinds of values are considered as valid components in weighing up decisions about the natural environment. Consultation exercises over major decisions should ensure that such 'intangible' and difficult-to-cost values are elicited (e.g. through stakeholder consultation) and considered fully, alongside the harder economic impacts.

The Economics of Ecosystems and Biodiversity (TEEB) report (2010) makes it clear that the invisibility of economic flows into nature is a significant contributor to the degradation of ecosystems and the loss of biodiversity. It is, therefore, important to adopt a new approach to the way that economic progress and growth are defined: one that includes the full environmental costs and benefits, for both present and future generations.

5. Relationship with sustainable development

We note the Welsh Government's commitment to embed sustainable development as the central organising principle of the Welsh Government and devolved bodies in Wales. However, we are concerned that the Green Paper does not include a clear definition of sustainable development.

As set out in our recent response to the consultation on Planning for Sustainability, CNP believes that the agreed definition of sustainable development must recognise that the economic and social aspects of sustainable development are inextricably dependent on the environment. All three pillars of sustainable development must be integrated in decision making and not traded off against each other. This requires an approach which seeks to secure 'win-win' solutions, delivering sustainable growth and positive outcomes for the environment, society and the economy.

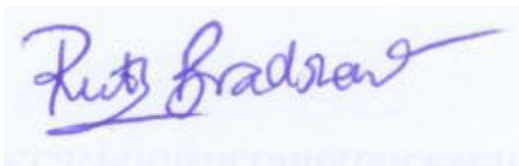
6. Involving people and communities

CNP welcomes the Welsh Government's commitment to engage people in the detailed work of developing and delivering the new framework. This will need to include active and continuous engagement with all sectors of Welsh society including communities, voluntary organisations, community and local councils, public bodies, private sector businesses and regulatory bodies. Wherever possible, this should be done through existing partnerships and arrangements, such as National Park Management Plans.

It will also be important to ensure that there are opportunities to engage with people who are currently under-represented as visitors to protected landscapes. The CNP Mosaic project which is just starting in Wales is a good example of this. There is further information on this in our response to Natural Resources Wales.

CNP trusts that these comments will be helpful in developing the proposals set out in Sustaining a Living Wales. We would be pleased to continue working with the Welsh Government and other partners to ensure the successful establishment of a new approach to effectively maintaining and enhancing all of Wales's natural resources.

Yours sincerely



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ⁱ Valuing our landscapes The European Landscape Convention in action: Making a difference in places that matter, Natural England 2010