



Submitted by email to: NPMP21@beacons-npa.gov.uk

Future Beacons – Consultation on the Management Plan for the Brecon Beacons National Park 2022-2027

A response from the Campaign for National Parks (March 2022)

Introduction

Campaign for National Parks is the independent national voice for the 13 National Parks in England and Wales. Our mission is to inspire everyone to enjoy and look after National Parks – the nation's green treasures. We have been campaigning for over 80 years to ensure that our National Parks are beautiful, inspirational places that are relevant, valued and protected for all.

Campaign for National Parks brings together a wide variety of people and organisations to address issues affecting National Parks and take action to keep these beautiful places safe. We draw on a large pool of experts among our members, many of whom are actively involved in designated landscapes and their communities, across Wales and England and further afield. We also work closely with the Alliance for Welsh Designated Landscapes and with the individual National Park Societies in both Wales and England. We have liaised with Brecon Beacons Park Society (BBPS) on the preparation of this response.

Management Plans are one of the key mechanisms that National Park Authorities have for furthering the statutory purposes of National Parks and enhancing their special qualities. We welcome the opportunity to respond to this consultation as we are keen to ensure that the Brecon Beacons Management Plan is as effective as possible.

This Review is taking place at a time when the longer-term implications of the Covid-19 pandemic are still uncertain, but it is already clear that there will be significant impacts, such as changes to visitor behaviour and the local economy, and we welcome the fact that the NPA has considered these impacts as part of the development of this version of the Management Plan. We are also very pleased to see the strong emphasis in the Plan on securing the levels of change needed to ensure that the National Park is making a leading contribution to tackling the climate and nature emergencies.

The NPA is to be commended for developing an ambitious and comprehensive Management Plan which clearly sets out both the scale, and wide range, of actions that are needed, as well as highlighting the importance of working in partnership to deliver these actions. It is good to see the inclusion of a very clear statement of the importance and status of the Plan (in the 'A plan of national significance' section on p23) and the NPA's role in overseeing its development (also on p23). While we are generally very supportive of the draft Plan, there are a number of areas where we believe changes are needed in order to ensure that it is as effective as possible. In particular, we would like to see the inclusion of much stronger, more

challenging targets and a stronger emphasis on securing change as quickly as possible. We have set out some more specific comments below.

Vision

The vision for the Brecon Beacons National Park set out on page 7 generally aligns very well with our own vision for National Parks, particularly the emphasis on tackling climate change and biodiversity decline and on the Park bringing joy and inspiration to all who live in and visit it. However, we would like to see the inclusion of something aimed at ensuring more people are able to enjoy and value the Park. While there is a reference to visitors in your vision, it does not cover this aspect. We would be particularly keen to see a reference to encouraging visits by those currently under-represented among visitors to the Park. This issue is addressed well in later policies, but we would like to see it addressed in the vision as well.

Linking different parts of the Plan

We like the fact that the Plan is very honest about the gap between the current situation and what needs to be achieved, as set out in the goals in the 'doughnut' diagrams. These cover a very comprehensive range of issues, as do the policies for delivery listed under each of the objectives in the later sections of the report. However, what is missing is something which clearly links the goals to the policies. While many cover similar ground, they are often described in different language, and it would be helpful to have something which made the links between them clearer. Given the number, and range of issues, covered in the policies for actions, it might also be helpful to include a list of these in one place, ideally with something that shows the linkages between them, for example, there are clearly links between outreach, sustainable tourism, and active travel but each of these are in separate parts of the Plan.

Need for stronger targets

We welcome the approach to describing each of the policies for action which is generally very clear and helpful with a clear statement of why each area is important and a brief description of what action will be taken. However, in most cases the 'what success looks like' sections could be strengthened by including more specific, quantified and time-bound targets. For example, in the section on 'Treescapes' there should be a deadline for development of the Treescapes Plan, as well as more specific targets for many of the elements listed under 'what does success look like' for example 'restore and expand wood pasture and parkland' should be amended to 'restore and/or expand x hectares of wood pasture and parkland by y date'. Without more specific targets, there is a risk that these policies will be simply aspirational so the final plan must include much stronger, and suitably challenging targets for each of the policy areas.

Ensuring visitors understand the need for change

While we welcome the reference to supporting visitors to connect with nature in the section on 'sustainable tourism', there needs to be a much stronger emphasis on helping visitors to understand the impacts of the nature and climate emergencies and how the Park needs to change in order to tackle those emergencies. While the section on 'resilient communities' includes a reference to encouraging carbon-literacy which is clearly vital, it is equally important to include something similar for visitors. There are some positive actions proposed elsewhere in the Plan to help address the impacts of large numbers of visitors in particular locations but what is also needed are measures to help visitors understand the impacts of different types of behaviour and how they can reduce those impacts, as well as helping them understand some of the other changes taking place in the Park, for example, in terms of land

management. It would also be good to include measures not just to educate, but also to empower visitors to take action on the climate and other environmental issues.

Identifying priorities for different areas

While there are a few references to specific locations, primarily in connection, with 'overtourism', the majority of the policies in the Plan are not spatially specific. However, there is a clearly a need to distinguish areas in which nature recovery is the over-riding priority from those where there is a greater emphasis on public access. We welcome the reference on page 63 to actively managing already busy areas in order to 'keep other areas tranquil and undisturbed, allowing nature room to flourish and providing opportunities for those looking for a wilder experience'. This is in line with the recommendation in our *Raising the Bar* report, published in 2018, that there should be areas within the Parks that are managed less intensively and that feel relatively wilder. However, at the moment it is quite hard to understand how these different parts of the Park relate to each other and how different areas will need to evolve to achieve these different ambitions and it would be helpful to provide a spatial representation which seeks to address this. We recognise that it may not be appropriate or even possible to draw definitive lines on a map but an indication of the areas in the Park which could become relatively wilder would be very helpful.

Role of sustainable transport

In general, we welcome the strong emphasis in the Plan on active travel and the provision of low/no carbon shared alternatives to the car. There are also opportunities to consider the role of sustainable travel in encouraging people to stay longer. We know that visitors are willing to see travel choices as part of their visitor experience in a way that residents are not and so promoting sustainable means of reaching high quality outdoor recreation experiences could play a role in helping to encourage people to extend their visits and use more local services. Research has also shown that people who use public transport tend to spend more money in the local area. There are, therefore, strong economic development arguments for investing in improved public transport for the National Park. There should be a particular emphasis on improving public transport options to and around the areas identified as suffering from 'overtourism'.

Second homes/affordable housing

Although there are a couple of references in the document to the challenge posed by the high number of second homes in the National Park, it is disappointing that there are no policies proposed to address this, particularly as this is identified as one of the factors making it harder for young people to live in the National Park. It is widely recognised that second home ownership has a significant impact on the affordability of housing for local people in many National Parks and the Welsh Government has recently been consulting on proposals to use the planning system to address this. We would like to see the inclusion of policies to use either the proposed new planning powers or other mechanisms to address second homes.

The Plan would also benefit from the inclusion of other more specific policies aimed at addressing the lack of affordable housing, particularly given the shortfall in affordable housing provision highlighted on page 35. While the section on 'resilient communities' includes a reference to aiming for a reduction in affordable housing need, there is a need for something far more specific to ensure increased provision, for example, 'increase the delivery of affordable housing by at least x affordable homes per year (or by y date)'. The wording of this should also make it clear that this is housing for local occupancy and that it will not be built on inappropriate or environmentally sensitive sites. Retaining and enforcing

occupancy conditions will be very important and opportunities should also be identified to add occupancy or primary residence conditions where appropriate.

For further information about any aspect of this response, please contact Ruth Bradshaw, Policy and Research Manager (email:ruthb@cnp.org.uk).