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To Whom it May Concern

20th February 2009

Re: High Level Policy Statement on Climate Change

Thank you for providing the Welsh Association of National Park Authorities (WANPA) with this opportunity to respond to the above consultation. The three Welsh National Park Authorities collaborate – working in partnership - to promote the collective interests of Wales' three National Parks.

The National Parks have two statutory purposes in the 1995 Environment Act:-

- Conserve and enhance the natural beauty, wildlife and cultural heritage of the National Park.
- Promote opportunities for the understanding and enjoyment of the special qualities of the Park by the public.

In fulfilling these purposes, the National Park Authority has a duty to:-

- Seek to foster the economic and social well being of the local communities within the National Parks.

Mirroring the Welsh Assembly Government's aspirations for the National Parks¹, we are beginning to address climate change, along with an inevitable "Peak Oil" future. We recognise that the special qualities of the National Parks will be particularly susceptible to predicted changes to the climate. While we are not able to mitigate against natural climatic changes the National Park Authorities are well placed – possessing expert

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¹ WAG Policy Statement for the National Parks and National Park Authorities in Wales 2007, pg 5



conservation and planning experience – to plan our adaptive response. Doing so will secure the future viability of our National Parks and the special qualities within.

With this in mind, we turn to WANPA's response to the questions posed in the consultation paper. We address each question in turn:

Q1 Does our proposed definition of our *One Wales* target seem reasonable?

We would like the Welsh Assembly Government to clarify how the 3% trajectory ties in with
 (a) the UK target for 20% on 1990 levels by 2010 and,
 (b) with the 5 year Climate Change Act carbon budgets.

Energy descent targets could also be framed in terms of peak oil, energy security and economic recovery (i.e. not just climate stability). The responses are effectively the same and this could be a more positive way of changing behaviour.

Q2 Does our proposed approach to sector targets seem reasonable? What level of reduction would you expect from each sector over ten years?

We agree that the proposed approach appears reasonable, though it assumes that the overall 3% trajectory is compatible with the Climate Change Act targets. Lower economic activity over the next few years is likely to result in emissions reductions; if so this should not be allowed to distract us from achieving 'real' i.e. additional reductions. The downturn itself should be the incentive to revisit definitions of economic success and reshape a sustainable economy.

Is it advantageous to consider the different warming effects of different greenhouse gases, together with emissions volumes? Should these different weights be reflected in the sectoral targets?

It is not clear why transport emissions could take up to ten years to stabilise. Assuming that fuel efficiency is increasing, does the transport target build in inevitable medium term growth in transport volumes and/or distance travelled? If so, why?

Q3 Does our proposed approach to broader consumption emissions seem reasonable?

We welcome the proposed use of ecological foot-printing. However we question the use of Gross Value Added (GVA) since it is derived from Gross Domestic Product (GDP) and likely to be in conflict with the other measures.

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We believe that the causes of the current economic climate constitute an additional reason to switch to broader measures of wellbeing and social/natural capital, such as the Index of Sustainable Welfare (ISEW).

Q4 Is there anything else we should be reporting alongside the 3% target, action by heavy industry and power generators and our wider ecological footprint to provide the full context of action to reduce emissions?

Possibilities include:

- A Wales-level Indicator of Sustainable Development
- Simple headline (global) emissions by country, and temperature trends for context;
- Net carbon sinks balance for Wales;
- Net carbon reduction impact of installed RE capacity, by type of renewable energy source;
- Net carbon reduction impact of efficiency measures by sector;
- Transport miles by mode of transport.

Q5 Do you agree with the areas we have identified for developing strategic actions?

Within the transport sector decarbonisation should place emphasis on changing consumer behaviour and processes, not just relying upon technical “fixes” such as substitute fuels and methods of propulsion.

Q6 Are there other strategic actions we should focus on developing for inclusion in the consultation on the programme of action to tackle climate change?

Promoting transition landscapes within a wider context of ‘transition Wales’. Wales’ protected landscapes (25% of the land area) have a major role to play as barometers for wider environmental and social change and, working with communities, as test-beds for much more widely applicable solutions. Wales’ three National Park Authorities are implementing this thinking, working within a draft 3 National Park climate change strategy.

Q7 How can we ensure that action to deliver our climate change objectives contributes to our wider policy agenda for example on improving health, addressing inequalities, building strong communities and developing a strong sustainable economy?

The agendas are inherently linked as climate change could seriously perturb environmental and socio-economic stability. Man-made climate change is also closely linked to socio-economic growth. Specifically WAG could promote socio-economic benefits by: promoting local energy generation utilising the technological developments within the micro-renewable energy sector, ensuring that economic benefits are kept as

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local as possible; promoting a national feed-in tariff amongst colleagues within the UK Government; and establish measures to protect the vulnerable (e.g. the fuel poor) and/or target the vulnerable as early beneficiaries.

Q8 How should the response to the challenges posed by climate change be developed to reflect differences across Wales?

We envisage the establishment of distributed renewable energy networks across Wales, and the offshore area, though the Wales Spatial Plan and marine spatial planning.

The Welsh Assembly Government and its partners, including the NPAs, should capitalise on transition-type initiatives, with their existing public support and champion/s, and work with businesses using energy security/rising input costs and the need for energy descent as the incentives.

Partners should tie sustainable energy generation to sustainable food production and link in protection/enhancement of ecosystem services (e.g. soil, catchment management).

Q9 Where should we focus action for emission reduction in the residential sector?

Additional support for energy advice centres accompanied by central funding of large scale community/domestic scale efficiency/renewables programmes to reconnect people with their energy usage (and wastage) through appropriate scaled and sited community/domestic renewables.

Q10 Where should we focus action for emission reduction in the transport sector?

Focus on building strategic new rail links.

Q11 Where should we focus action for emission reduction in the agriculture and land use sector?

Water management – wetland restoration in uplands and lowlands, which in turn will help to reduce both carbon and methane emissions, reduce flood burdens, increase security of water supply and improve water quality.

Q12 Where should we focus action for emission reduction in the public sector?

We agree that the public sector can play a leadership and demonstration role to private, residential and transport sectors, especially as public bodies face the same reduction issues as householders and businesses in terms of transport, heat and power. Sustainable Development Fund (SDF) funds many innovative carbon reduction & management

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projects within the National Parks and on their periphery. Central funding to develop the experimental function of National Parks to promote mainstream & commercial development of successful projects across Wales would be immensely useful.

Q13 Where should we focus action for emission reduction in the waste sector?

Our suggestions include:

- Streamline and reduce the range of packaging materials;
- Provide a financial incentive for waste recycling;
- Encourage LAs to develop more business partnerships to reduce, reuse and recycle.

Q14 Where should we focus action for emission reduction in the business sector?

Our suggestions include:

- Procurement;
- Longer product shelf life;
- Reduced emphasis on product 'upgrades';
- Heavier emphasis on polluter pays principle.

Q15 Does our proposed approach to adaptation seem reasonable?

Climate change elevates the importance of all other factors affecting the environment: the effects of habitat fragmentation, soil degradation, runoff etc are all potentially exacerbated by climate change. Therefore all measures in the Environment Strategy need to be considered also as climate change adaptation measures and resourced accordingly. Retaining human and other biodiversity's capacity to respond to changes in climate space etc is critical; establishing species/habitat connections is essential to this.

It is essential to provide people with the means to change their behaviour when raising awareness of environmental problems such as climate change otherwise people may harden their attitudes to reflect a perceived inability to act.

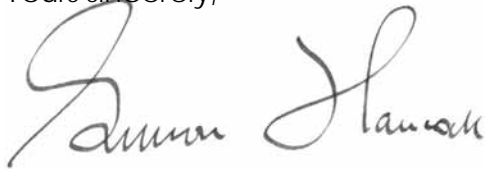
Q16 In what specific areas should we focus adaptation action?

We recommend that further support is given to the Countryside Council for Wales (CCW) and Local Records Centres to undertake local connectivity mapping for key species groups for use by Local Planning Authorities (LPAs) overall in planning; for NPAs and AONBs in land management; and to help WAG in delivery of agri-environment schemes.




Once again, thank you for allowing WANPA to make this contribution to your consultation. This response is a joint piece of work between the three National Park Authorities. Should any of the above require further clarification, please contact the WANPA Welsh Policy Officer, Greg Pycroft, in the first instance.

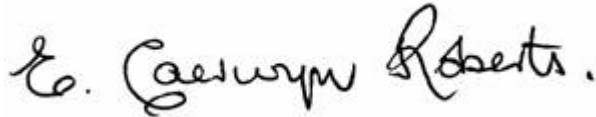
Yours sincerely,



Cllr. Simon Hancock, Chairman, WANPA & Pembrokeshire Coast NPA



Mrs Mary Taylor, Chairman, Brecon Beacons NPA



Cllr. Caerwyn Roberts, Chairman, Snowdonia NPA

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