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Your Ref:  
Our Ref:

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To Whom it May Concern

**Re: Climate Change Strategy – Programme of Action Consultation**

Thank you for this opportunity to respond to this consultation, the most recent to feed into the Welsh Assembly Government's *Climate Change Strategy* later this year. WANPA has already responded to the previous consultation on the *High Level Policy Statement* earlier this year and we want to avoid repeating comments that have already been made.

The three Welsh National Park Authorities (NPAs) work in partnership as an association (WANPA) to promote the collective interests of Wales' three National Parks. We use opportunities such as this to share experiences and best practice, gained within the National Park setting, beyond our boundaries.

We have chosen to refrain from responding to each question in turn, the quantity and repetitive nature of the questions has led us to choose to respond to the broad issues raised within the programme for fear of repeating ourselves. The NPAs are independent authorities sitting within the public sector in Wales, they are not full local authorities per se, which is the impression left by the consultation.

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BRECON BEACONS  
NATIONAL PARK



Park Cenedlaethol  
Safonwr Pembrokeshire  
Pembrokeshire Coast  
National Park



SNOWDONIA  
NATIONAL PARK



1949-2009

Deddf Parciau Cenedlaethol  
a Mynediad i Gefn Gwlad  
National Parks and Access  
to the Countryside Act

Prior to commenting upon points raised within the consultation, we wish to note our disappointment that the National Parks and NPAs fail to have a more prominent role within the programme of action. We envisage a role for National Parks addressing Climate Change – indeed we understand that this is also the view of the Minister and is in line with the 2007 National Parks Policy Statement. Making up 20% of Wales by area, the National Parks cover a significant range of special qualities worthy of national recognition and protection. Protected from significant human intervention over fifty years the special qualities within National Parks are particularly susceptible to changes brought about by Climate Change. Wales is at serious risk of losing habitats that provide essential ecosystem services as well as suffering the significant economic impact of losing their allure to visitors.

National Parks and the National Parks Authorities possess a number of strengths that make them well suited to contribute to tackling the causes and consequences of climate change. NPAs are planning authorities that have a record of planning for energy efficient and sustainable design and development. We also have a record of facilitating and enabling community-led projects, often utilising the Sustainable Development Fund to support and lever in funding to assist projects that address climate change. Finally, National Parks contain the ecosystem services that serve and will continue to serve Wales from the sequestration of carbon within upland soils to the regulation of water.

The Climate Change aspirations of the NPAs in Wales mirror those of the Welsh Assembly Government, which set out its medium-term vision and strategic agenda for National Parks in its 2007 policy statement. Within the statement WAG expresses its confidence in NPAs to deliver the triple bottom line, environmental, economic and social, benefits of sustainable development which are also applicable to tackling Climate Change.

Sustainable development principles are well embedded within the National Park Authorities, and as you can see from appendix 1 National Parks are already involved in a wide range of projects and programmes that address Climate Change, in terms of its mitigation and our adaptation. We believe that given careful planning and management the National Parks are able to act as test beds for a number of WAG sponsored initiatives set out in the programme. The NPAs also have a long track record of complementing national schemes with local, gap-filling initiatives. If similar initiatives already exist, and our appendix 1 provides a list of examples, we hope to share the knowledge already gained with the relevant stakeholders. We hope that further consideration is given to include this offer of greater collaboration in the final Climate Change Strategy.

We support the broad focus adopted by WAG and set out in brief on pages 11 and 12 of the consultation document. As one of a number of authorities that will have to work in partnership with others to deliver the programme on the ground we look to WAG to provide the necessary strategic leadership. The focus covers a broad range of responses for WAG to lead within which we believe the NPAs can play their part. In particular the NPAs can add value to Glastir (proposed action 11, and details on pg 101), by giving targeted, practical assistance to farmers to deliver carbon-, catchment- and connection-sensitive land management. We also look forward to helping householders and communities realise the new economic and environmental opportunities that will result

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from revision of the feed-in tariff, via our development planning and management functions.

We want to stress the need for wide ranging, big step, innovative changes required to move the nation to a low emission economy. Some changes will require technological innovation, many will require improved rural infrastructure. All will require the support of Government, strategic and financial.

We hope that WAG considers whether local government have the necessary personnel to facilitate local projects and the role of private utilities and their relationship with the public sector as they discharge their public responsibilities, for example water catchment management.

We believe the Programme, as it stands, would benefit from providing a clearer indication of the timescales within which each action is expected to operate. In its present form the programme lacks the sense of urgency now associated with Climate Change. We assume that all of the actions exist within the time frame of the Vision, up to 2050. However, some proposed actions, see 2, 3 and 6 appear to operate over a 2 - 3year period in which costs are linked to specific funding, with little indication of what takes place after that time. Others make no mention of timescale irrespective of cost or funding. We assume that some, such as proposed action 1, supporting behaviour change will remain relevant and require buy-in from stakeholders over and beyond a generation, some 25 years plus, but this is not clearly indicated. In spite of the level of uncertainty we have to live with providing some indication of timescales at this point in proceedings would allow WAG, authorities (such as NPAs) and other relevant agencies to begin to manage their response through adequate planning and allocating the necessary funding.

Within our own work on Climate Change the response of National Parks has also been framed within the context of the global energy descent from peak oil and the management of the transition from the status quo to a post-carbon economy. We note the linkages that are also made within the programme of action and hope to see these carried through to the final Strategy.

We cannot find however reference to peak oil in the Programme. Contentious though this issue may be – as the possibility of climate change was for many years – we believe that that sooner the issue is debated, and linked with the complementary actions to address climate change, the greater the sense of urgency and shared responsibility there will be to tackle these closely-related issues.

We feel that this is important, as there is a risk that incremental changes could actually obstruct (by diverting money and attention away from) the larger step changes that will be required to achieve the CO<sub>2</sub> reduction profile on p23, which we entirely support and welcome. Speed is also of the essence if we are to secure the considerable first-mover and network advantages to be gained from tidal energy generation and creation of the associated grid links around Wales' coast.

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Again, thank you for this opportunity to comment up the proposed Programme for Action. The challenge for NPAs over the course of this century will remain the same as the past fifty years, to retain the quality, value and utility of National Parks even as their landscape character evolves. In the face of Climate Change we look to WAG to provide us with the strategic all-Wales leadership and the necessary tools to ensure we continue to meet the challenge and deliver the National Park purposes.

Yours sincerely,



**Greg Pycroft**  
Welsh Policy Officer

**Including contributions from:**

Brecon Beacons National Park Authority  
Pembrokeshire Coast National Park Authority  
Snowdonia National Park Authority

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## Appendix 1.

### National Park Authority supported activity in response to Climate Change

#### Brecon Beacons NPA

- July 2009 BBNPA prepared a report entitled "The Brecon Beacons National Park: a good place for the Glastir Sustainable Land Management Scheme". This report explains the value of the uplands of the Brecon Beacons National Park and their strategic importance to Wales in terms of investment through an agri-environment scheme.
- Mitigating and adapting to climate change are central themes in the National Park Management Plan
- Long term corporate objective "Demonstrate sustainable landscape scale conservation techniques compatible with the reformed CAP on NPA-owned sites"
- Uplands Erosion Strategy being developed.
- Peat bog restoration work underway on 20ha of eroding raised bog at Waun Figen Felen, and 40ha on the Wales-England border, with other sites identified to benefit from the expertise developed here; exploring options for providing carbon off-setting through restoration of eroded landscapes.
- Funding of the Wye and Usk Foundation's European funded river restoration project, including river bank restoration.
- 3 NPA-owned commons (Mynydd Illtyd, Cefn Llechid, Pen y Crug) recently submitted in a combined Tir Gofal application. Manor Mawr Penderyn common the focus of integrated management plan development with the commoners association. Hatterrall, part of Black Mountains SSSI, the focus of an integrated, cross-border project development involving CCW, WAG, DEFRA, Natural England and BBNPA.
- A S106 Management Agreement with Dwr Cymru to achieve catchment management on 500ha of its 4000ha holdings on the Great Forest of Brecknock
- LBAP review is nearing completion, with focus shifted to integrated habitat conservation
- Better Woodlands for Wales grant applications.
- Leader + projects for sourcing local, sustainable timber and wood fuel
- Policy advice being developed, NP Ecologists' position statement now finalised, but no direct involvement in WFD implementation yet
- Partnership working with EAW on eradicating giant hogweed from the Usk
- BBNPA planning advice notes on renewable energy technologies;
- Design Guide supplementary planning guidance in final draft stages;
- Biodiversity and Geodiversity SPG already approved and in the public domain.
- Planning advice notes for renewable energy installations;
- Renewable Energy & Assistance Programme (BBNPA/CPRW partnership including technical and planning advice and grants for installations).
- Consistent objection to Felindre to Tirley natural gas pipeline scheme, which results in a net increase of fossil fuel use in Wales and England, as well as carbon emissions from construction and reinstatement procedures and exposure of organic soils.
- All BBNPA's landholdings assessed for feasibility of HEP generation. Seven existing community HEP scheme up and running, many more in development. Achievable in

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the next 5 years: - 7% of all domestic and farm-based electricity could be generated from just 25 residences/farms plus 2 reservoirs serving 2 settlements (Talybont and Trecastle). All that's needed is the investment and planning consents.

- 3 Green Valleys Project is the only Welsh finalist in the UK-wide Big Green Challenge Project, aiming to win up to £1m to cut carbon emissions and generate small scale renewable energy projects in the Park.
- Planning consent recently granted for a 1MW anaerobic digester, generating combined heat and power.
- Renewable energy advice and marketing events supported.
- Sustainable Design Guide published; objective to ensure the Park goes carbon neutral for all new development via appropriate policies in the Local Development Plan; planning advice notes available for installation of renewable technologies.
- BBNPA Compost Bin scheme, re-use of arisings from habitat management work in the Park, e.g., gorse and bracken scrub arisings used for Waun Fignen Felen bog restoration.
- First Welsh NPA to receive the European Charter for Sustainable Tourism in Protected Areas
- Provide support and advice to schools seeking Eco-schools status.
- Developing interpretation training course to improve communication skills on key topics
- Beacons Bus Scheme operating during summer bank holidays and weekends

### **Pembrokeshire Coast NPA**

- Completion of a Renewable Energy Assessment for the National Park
- "Connectivity plus": coupling habitat connectivity with socio-economic opportunities to identify the best biodiversity return on investment
- Habitat creation and management e.g. Conserving the Coastal Slopes scheme on 90+ sites Park-wide
- Development of value-added products e.g. timber provision for Senedd
- Management agreements for conservation (including promotion of agricultural best practice) with farmers on 500ha of land
- Soil Association registration for St David's Airfield with spectacular wildlife recovery
- Food education – e.g. Spade to Fork project for schoolchildren
- Administer Pembrokeshire Grazing Network to conserve wildlife and habitat connectivity in the wider countryside
- Woodland management on 300ha of owned/leased sites; advice on a further 400ha p.a.
- Timber processing at Cilrhedyn Centre; partner in Pembrokeshire Timber Store. Developing products so as to create new end-uses for small-dimension timber
- Heathland restoration and soil management on upland sites previously planted with conifers
- Planning Ty Unnos and other sustainable building formats for NPA sites and private sector developments
- Monitoring biodiversity on NPA sites and National Park land and through local Biodiversity Action partnerships
- Tackling invasive species through partnership

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- Reducing those impacts on the marine environment over which we have some influence (e.g. disturbance and fishing) so as to reduce in-combination impacts of climate change
- Setting policy context in the current and next generation National Park Management Plan and development plan.
- Leading by example – e.g. wind turbine, ground source heat pumps, solar thermal, biomass heating, grey water harvesting at PCNPA HQ, Newport Information Centre, Castell Henllys and St David's Gallery; PCNPA landfill waste reduced by 50%.
- Implementation locally of the Three Parks Sustainable Design Guidance.
- Maintaining quality of experience on the National Trail, rights of way, access land and sites in the face of accelerated coastal erosion and runoff
- Enabling people to enjoy the Park without cars – and if they do use their car they can purchase tickets from a solar-powered pay and display machine being trialled.
- 3 vans using biodiesel; also tractors and other vehicles.
- Member of Greenways Partnership – coastal and Preseli buses; Park and Ride
- Brokering sustainable transport solutions at St Justinian's

### Snowdonia NPA

- Habitat Management – Rhaglen Tir Eryri SNPA provides facilitation, advisory service and management agreements to manage habitats. Specific focus on common land. Graziers manage appropriate habits and the consequential improvements in water and carbon management. Increasing skills levels and awareness of carbon management. Working locally to look at successor elements to Rhaglen Tir Eryri to look at carbon and water management.
- Habitat Re-creation – removal of inappropriately planted conifer blocks on peat soils especially bogs. Allowing bogs to re-establish, locking up carbon and benefiting water management.
- Wetting of areas – allowing areas to re-wet, benefits water retention; reduce water colouration on supplies and improves carbon accumulation.
- Full partners with WAG in the delivery of the pilot Catchments Sensitive Farming project in the Bala area.
- Assisted in planting of 85ha of broadleaved woodland last year.
- Provision of advice and tree nursery facility for land managers within NP.
- Proofing the local Biodiversity Action Plan for climate change.
- Policies currently reviewed as part on LDP and NPMP adoption.
- Currently involved with erosion control, concerns that due to Climate Change frequency of flash floods will pose more serious issues for ground works.
- Snowdonia Green Keys starting to link local transport services with the National infrastructure/ timetables; most users of this NP could use the area by public transport and not the car.
- Snowdonia Green Key initiative - helping visitors to enjoy the National Park in a sustainable way.
- Travel allowances discourage more - polluting vehicles (i.e. VED bands above A,B and C)

Collectively:

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- Climate change was the theme of the three Parks' RWS presence 2007 and of the ANPA Members Workshop 2007
- 3 Welsh National Parks leading on a statement of principles and action for ecosystem management.
- NPA operations meet Green Dragon Level 4 standards, which include carbon reduction from transport, energy and waste.
- The NPAs are all signatories to the WLGA declaration on climate change.
- Input to Wales and UK consultations on Climate Change and related policy consultations.

And through the Welsh Assembly Government's Sustainable Development Fund (SDF/CAE) we have all financed:

- energy generation, conservation and efficiency schemes
- local food schemes
- waste reduction and recycling schemes
- climate change education and awareness programmes
- transport initiatives



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