



NATIONAL PARKS WALES
Britain's breathing spaces

Debbie Westlake,
Communication Team
Living Wales Programme
Welsh Government
2nd Floor, Cathays Park
Cardiff
CF10 3NQ
By Email: LivingWales@Wales.gsi.gov.uk

30 May 2012

National Parks Wales' Response to *Sustaining A Living Wales*

National Parks Wales is grateful for the opportunity to respond to the Welsh Government consultation, *Sustaining A Living Wales: A Green Paper on a new approach to natural resource management in Wales*. The three National Park Authorities (NPAs) in Wales work in partnership to collectively respond to policy issues with the potential to influence the management of Wales' National Parks.

This response has been informed by National Park Authority Members and Officers, who are able to draw from their expertise of working within the National Parks.

Summary

- National Parks Wales agrees with the principle of adopting an ecosystems approach, for too long environmental issues have been seen as a hindrance to economic development. By placing an ecosystem approach firmly at the centre of public policy and getting everyone to realise the benefits of long-term, planned natural resource management means that Wales will be able to continue to rely on a flow of ecosystem goods and services.
- Sustaining a Living Wales needs to include greater recognition of the progress that has already been made and the positive direction that environmental conservation is moving in, albeit very slowly.
- We suggest that the Welsh Government considers presenting the ecosystem approach terms of 'landscape-scale management'. This "landscape-scale" approach, based on landscape functioning and human associations, and also incorporating historic and cultural aspects, provision of a secure and sufficient food supply, people's use of the countryside for recreation and learning etc, should still



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Parc Cenedlaethol
Arfordir Penfro
Pembrokeshire Coast
National Park



PARC CENEDLAETHOL ERYRI
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Parciau Cenedlaethol Cymru
National Parks Wales

126 Stryd Bute / 126 Bute Street
Caerdydd / Cardiff, CF10 5LE

Ffôn / Tel 029 2049 9966
Ffacs / Fax 029 2049 9580

Ebost / Email nationalparkswales@anpa.gov.uk

give primacy to essential ecological goals, via the proposed national and local resource management plans.

- The National Parks, and other protected landscapes in Wales, for example the Areas of Outstanding Natural Beauty (AONBs) presents a compelling, evidence-based approach to natural resource management. Along with colleagues in the AONBs we would welcome any opportunity to work with the Welsh Government to deliver these plans within the context of the Natural Environment Framework.
- National Parks Wales recommends that Wales must expand its investment in biodiversity conservation, or we risk failing to meet our 2020 target to halt biodiversity loss, and in doing so undermine the provision of ecosystem services. Now is the time to maximise resources for biodiversity conservation in order to maximise the resilience of habitats, species and ecosystems in the face of climate change.
- We recommend that rather than seeking to redefine everything in terms of ecosystems, the aim should be to use ecosystems as a framework to carry existing approaches forward, to build and expand what we have already rather than supplant and replace. A better screening process on legislation, policy development, action planning and decision making based upon ecosystem principles, i.e., the 12 principles for the ecosystem approach will help.
- The management planning approach used by NPAs for site planning, and then adapted for National Park management planning (for integrated management of natural and cultural resources, and of assets for recreation and learning) was originally developed by the Countryside Council for Wales (CCW). CCW's model has been successfully applied from small sites to large regions, worldwide, and we propose that the system should provide the template for resource management planning at national and local levels. An additional benefit is the fact that it is a system which is familiar to many conservation managers in Wales.
- National Parks Wales recommends that Welsh Government utilises the legislation to make linkages to be made between local resource management planning areas whether via land-use, habitats, watercourses, migration routes etc. These can be strongly supported by pan-Wales programmes like Glastir, and by a proactive approach to nature conservation by local authorities.
- It appears that the implementation of law and/or the extent of protected sites are insufficient. National Parks Wales believes that both need to be addressed in more detail, and that the quality and extent of protection should be extended. There will also be a need to maintain clear boundaries between land-use planning and environmental regulation. We welcome a review of environmental protection in the context of evolution rather than revolution.
- Wales needs to acknowledge that it is as a result of the lack of national will and resources, by every nation that ratified the CBD that biodiversity conservation has



failed to meet international, national and local targets. The existing conservation systems themselves are not to blame for the failures.

- Increased awareness of and sympathy for the environment is perhaps best achieved through first-hand enjoyment through a wide variety of recreational activities.



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Ffôn / Tel 029 2049 9966
Ffacs / Fax 029 2049 9580
Eboost / Email nationalparkswales@anpa.gov.uk

Our response reflects the order of questions contained within the Green Paper (pgs 30 and 31).

The General Questions.

Developing a new approach to environmental protection based on ecosystems?

National Parks Wales welcomes the holistic, ecosystem approach, proposed by the Welsh Government as an essential basis for efficient and timely environmental protection, and in order to judge the overall sufficiency and effectiveness of that protection.

Sustaining a Living Wales needs to include greater recognition of the progress that has already been made and the positive direction that environmental conservation is moving in, albeit very slowly. The emphasis should be to build on what we are doing already.

The extent to which aims, aspirations and the ecosystems approach are shared and implemented by other sectors will be the most important factor in determining the extent to which the Welsh Government fulfils its aims. In Wales, the extent to which these are understood by local authorities and the wider public will be the most important factor in influencing the extent to which the ecosystems approach can be implemented.

An ecosystem/national resource management planning approach allows for absolute limits on human impacts where required, (in a manner similar to the EU's recognition of a 2°C rise in global temperature as constituting dangerous climate change and the basis for national emissions reductions).

Sustaining a Living Wales is also relevant to Welsh Government's proposed Sustainable Development Bill and Heritage Bill. We suggest that the historic environment should be integrated with the proposals in Sustaining a Living Wales, on the basis that the landscape of Wales is - almost everywhere - highly modified and that historic land uses are often the key to nature conservation.

While National Parks Wales supports the ecosystem approach to resource management we wish to suggest that the Welsh Government considers presenting it terms of 'landscape-scale management'. This "landscape-scale" approach, based on landscape functioning and human associations, and also incorporating historic and cultural aspects, provision of a secure and sufficient food supply, people's use of the countryside for recreation and learning etc, should still give primacy to essential ecological goals, via the proposed national and local resource management plans. We cannot help but notice the parallels here to the Sandford Principle which is applied to National Park purposes, in terms of the primacy of goals for natural resources.

Wales' protected landscapes demonstrate an integrated approach to landscape management, and National Parks Wales proposes that these represent a range of pilot projects for the proposed ecosystem approach.



Effort will have to be invested into defining and conveying this new concept to other sectors that will be responsible for the delivery of the ecosystem approach – which will be largely out of the hands of environmentally conscious organisations. The private sector and Government bodies that deliver economic development may be more inclined to regard this approach as a constraint on development, rather than an opportunity.

Success will depend upon the allocation, and perhaps more importantly, the reallocation of resources to invest in the necessary improvements to biodiversity. If additional resources cannot be found then other sources of direct or indirect finance must be found. National Parks Wales recommends that Wales must expand its investment in biodiversity conservation, or we risk failing to meet our 2020 target to halt biodiversity loss, and in doing so undermine the provision of ecosystem services. Now is the time to maximise resources for biodiversity conservation in order to maximise the resilience of habitats, species and ecosystems in the face of climate change.

Developing the concept of local resource management planning for natural resources to provide a simpler approach for stakeholders.
Developing a national resource management plan.

The proposals for national resource management planning are welcome. National resource management planning may help us to reduce Wales' ecological footprint, and may also help protect Wales' resources from unsustainable burdens placed on them from elsewhere.

The Green Paper is trying to achieve a holistic and integrated means of ensuring that policy making, action planning and decision-making across the board take full account of biodiversity conservation and natural resource management; that decisions do not lead to or contribute to further losses but lead to restoration and enhancement. This is welcomed. The ecosystem approach as a means of achieving this is however a thought process, a screening process, not a legislative or regulatory process per se. The 12 Convention for Biological Diversity (CBD) ecosystem approach principles expound this.

We recommend that rather than seeking to redefine everything in terms of ecosystems, the aim should be to use ecosystems as a framework to carry existing approaches forward, to build and expand what we have already rather than supplant and replace. A better screening process on legislation, policy development, action planning and decision making based upon ecosystem principles, i.e., the 12 principles for the ecosystem approach will help.

There is a need to identify and reach a consensus concerning the authority responsible for planning local resource management and identify the relevant stakeholders.

Welsh Government could, through a national resource management plan, set absolute outcomes/parameters at the Wales level, and as far as possible let each local area fulfill its contribution according to its local endowment of natural resources, but within the national framework. However, there should be a statutory basis for local resource management plans, and for them to fulfill the national resource management plan.



Some national park management plans, both in Wales and further afield (e.g. North America, New Zealand), may provide good models for the proposed resource management plans. The management planning approach used by NPAs for site planning, and then adapted for National Park management planning (for integrated management of natural and cultural resources, and of assets for recreation and learning) was originally developed by the Countryside Council for Wales (CCW). CCW's model has been successfully applied from small sites to large regions, worldwide, and we propose that the system should provide the template for resource management planning at national and local levels. An additional benefit is the fact that it is a system which is familiar to many conservation managers in Wales.

Local resource management plans could provide the framework within which Local Development Plans (LDPs) operate, exactly as National Park Management Plans provide a framework for LDPs in National Park areas. While local resource management plans might be administratively simplest to implement at a local planning authority level, other possibilities exist - for example; Eco-region; catchment system; aggregated local planning jurisdictions etc.

National Parks Wales recommends that Welsh Government utilises the legislation to make linkages to be made between local resource management planning areas whether via land-use, habitats, watercourses, migration routes etc. These can be strongly supported by pan-Wales programmes like Glastir, and by a proactive approach to nature conservation by local authorities, in keeping with the principle of Section 40 of the Natural Environment and Communities Act 2006, which places a duty on public authorities to have regard to conservation and enhancement of biodiversity in the exercise of their functions. Agricultural incentives, in particular, also need to take account of national resource management plan aims.

National Parks Wales hopes that the legislation will enable the Welsh NPAs to define the implementation of the framework within the National Parks. This is currently achieved through the process of management planning for National Park and for Areas of Outstanding Natural Beauty. We would welcome a strong recognition - within the legislation - for the place and value of these plans in delivering the Natural Environment Framework within protected landscapes.

The coastal NPAs welcome further detail on proposals for the wider marine environment and associated resources, especially since the network of Highly Protected Marine Conservation Zones is likely to be widely-dispersed and small in its overall coverage. As long as natural resource outcomes have primacy - and again this could be achieved by reflecting the 12 CBD principles - then integrating terrestrial and marine planning across the coastal strip and inshore area should not prove problematic. Local resource management plans would need to refer to trans-boundary/national goals set out in the national resource management plan and relevant marine spatial plans.

Streamlining regulatory regimes to achieve better outcomes for the environment and simpler systems for people



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Ffacs / Fax 029 2049 9580

Ebost / Email nationalparkswales@anpa.gov.uk

Given the global failure to achieve the 2010 CBD targets, it appears that the implementation of law and/or the extent of protected sites are insufficient. National Parks Wales believes that both need to be addressed in more detail, and that the quality and extent of protection should be extended. There will also be a need to maintain clear boundaries between land-use planning and environmental regulation.

We welcome a review of environmental protection in the context of evolution rather than revolution. Timescales are ambitious and Wales must not lose the quality of decision-making or the protective mechanisms that currently exist, until and unless proven replacements are in place and running. We strongly urge that current site-based protection (e.g. under Wildlife and Countryside Act 1981, as amended) is retained, and that any review of site-based nature conservation designations should be undertaken with the intention of improved integration. This may mean larger sites, and/or the need for buffer zones around their periphery where management controls are also present.

An ecosystem approach is still likely to take the form of habitat-, species-, and industry-specific regulation and interventions. This legislation should be fit for purpose and enforced: significant tranches of legislation already on the statute book are rarely enforced. There are also issues over interpretation of legislation (e.g. Habitats Regulations). Some national and local resource management planning goals may be achieved simply through better implementation of existing legislation.

We recommend that the Welsh Government identifies barriers to existing biodiversity conservation and environmental protection regulation, policy and practice, and sets about removing those. Clearing 'blockages' in the system would enable existing systems to operate more efficiently and effectively and this in turn might produce tangible outcomes. A measure might then be made of the extent to which outcomes that follow this adjustment contribute towards the ecosystem approach. This could sit alongside the screening system recommended above.

Greater legislative clarity may also be a helpful deterrent since it gives regulators clearer parameters for enforcement. However we wish to stress the contribution of positive incentives, as opposed to regulatory enforcement, for wider behavioural change.

Wales needs to acknowledge that it is as a result of the lack of national will and resources, by every nation that ratified the CBD that biodiversity conservation has failed to meet international, national and local targets. The existing conservation systems themselves are not to blame for the failures.

Developing interactive geographical information systems to make information more accessible and engage people more widely.

Developing our approach to monitoring and data gathering to increase the emphasis on practical evidence gathering.

National Parks Wales supports the proposals set out within Sustaining a Living Wales inasmuch as they can enable good and timely decision-making and promote public awareness and understanding. Yet the approach will fail if tools such as GIS are not used



and the information not made widely and freely available. Share datasets would assist bodies, such as the National Park Authorities with the monitoring of National park Management Plans and the production of State of the Park Reports.

However, data may not be the limiting factor to timely decision-making and protection. In terms of public understanding and behaviour, increased awareness of and sympathy for the environment is perhaps best achieved through first-hand enjoyment through a wide variety of recreational activities.

A great deal of data has already been collected by a variety of organisations. Collaborative working will identify data gaps and enable the prioritisation of further data gathering and monitoring activities. Despite this, time-series data by definition takes time to assemble, and marine data is generally more costly and time-consuming to collect than land-based data. What may be as important is a willingness to employ the precautionary approach, i.e. of being 'approximately right' in a timely fashion rather than 'precisely wrong' after the fact.

The Detailed Questions

If you agree or disagree with the proposals above, what are your main reasons?

National Parks Wales agrees with the principle of adopting an ecosystems approach, for too long environmental issues have been seen as a hindrance to economic development. By placing an ecosystem approach firmly at the centre of public policy and getting everyone to realise the benefits of long-term, planned natural resource management means that Wales will be able to continue to rely on a flow of ecosystem goods and services.

We wish to draw the Welsh Government's attention to the close similarity between the CBD 12 principles for the ecosystem approach and the IUCN management guidelines for Category V protected landscapes, such as Wales' National Parks and areas of outstanding natural beauty. The National Parks and AONBs may be Wales' best places to implement the ecosystem approach, where large semi-natural areas are framed by their interaction with people.

What do you think should be the main priorities for our work in simplifying and integrating designations, policies and regulatory regimes?

Clear guidance needs to be provided to developers so that they understand the roles and responsibilities of the regulatory bodies. Guidance would be expected to include; the information they need to provide to support their application; the decision-making process involved along with time-scales etc.

Regulatory regimes can be simplified and integrated. The licensing and consenting of hydropower schemes by the Environment Agency is a good example of how the decision-making process can be streamlined. Where multiple consents under different regimes are required then Service Level Agreements between the regulators would ensure timely



responses to consultations. Performance Agreements, with agreed timetables for decisions, between the developers and regulators would also be beneficial.

What would you define as the main success criteria for natural resource management?

National Parks Wales envisages robust and resilient ecosystems which are able to adapt to climate change and continue to provide the environmental goods and services on which we all rely.

Welsh Government may like to explore, by looking at National Parks and AONBs, ways in which local authorities can help with the proactive implementation of the Living Wales programme (the influence of protected areas extends to 25% of Wales' land area).

For example the Wales Coast Path presents a golden opportunity for habitat restoration and improved connectivity for biodiversity. For example, in Pembrokeshire Coast National Park, the coastal corridor now makes a key contribution to connectivity for wildlife, and provides a core area (or refuge) for many species.

The Wales Coast Path offers the chance to restore management to the coastal corridor around the whole of Wales, whilst utilising local authorities and/or Glastir as the funding and delivery mechanism. Welsh Government could even extend the width of the corridor itself to one or two fields. Wales would then have a potentially broad conservation corridor connecting north and south Wales, managed with wildlife and human wellbeing goals in mind and supporting the visitor economy – a relatively straight forward goal for the Living Wales programme and one with precedent and based on evidence. This example illustrates the importance of joined-up local management planning within the overview of the national resource management plan.

What would be the success factors for the new Welsh Single Body in delivering the new approach?

Ensuring that ecosystems become robust and resilient (see above) and managed in order to maintain the flow of ecosystem goods and services. This will require an in-depth understanding and careful monitoring of the ecosystems along with appropriate systems in place to respond to undesirable change.

The Single Body cannot be solely responsible for achieving headline goals (such as the Convention on Biological Diversity targets) and it will need to work through other organisations and individuals; considerable expertise exists across Wales which can be relied upon.

Have we reflected the opportunities for business, enterprise and economic development with the natural environment? If not, what have we missed?

The ecosystem approach should acknowledge the wider context for business, enterprise and economic development, the two are not mutually exclusive. Landscape features and



factors in certain areas will provide specific entrepreneurial opportunities; while linguistic and cultural factors will provide opportunities in other areas.

Have we reflected the opportunities for social and well-being benefits for the people of Wales with the natural environment? If not, what aspects have we missed?

National Parks Wales would encourage the Welsh Government to make reference to, but not quantify, intrinsic value as an important way for people to re-engage with their surroundings. People value a species or a landscape for the feelings generated – whether in terms of pleasure, patriotism or pride, not in terms of economic value.

Where should the boundaries lie between land use planning and environmental management planning and consenting?

The boundaries should be broadly where they are at present; any changes proposed must be to improve existing systems and to provide an efficient and transparent decision-making process. Wherever these new boundaries lie, they should be agreed by consensus between the relevant agencies.

What skills and tools would we need to make the new approach successful? Can you help us deliver these?

The 3 National Park Authorities have a wealth of experience in planning, managing and conserving the natural environment of a substantial land area of Wales. Through the Sustainable Development Fund they have been able to support, and act as test beds, for a variety of innovative projects and approaches, generating an evidence-base in the process.

How could national or local resource management plans help preparation of local development plans?

There are already examples in the field of waste and minerals planning where work carried out in the preparation of Regional Waste Plans and Regional Technical Statements on aggregates used concepts such as “environmental capacity” to identify areas where regional and sub-regional waste facilities could be located and where aggregate extraction was acceptable. Work done by the British Geological Survey has produced a minerals resource map for Wales and identified areas where specific minerals should be safeguarded from sterilisation. This information has been fed into the production of Local Development Plans.

Should local ecosystems outcomes be included in local single integrated plans?

Yes.

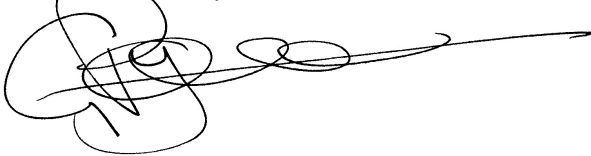
What steps could we take to create a market in those environmental services that are currently undervalued?



We welcome the reduced emphasis in Sustaining a Living Wales (compared to earlier documents produced as part of the Living Wales programme) on market and proxy valuation of ecosystem services. Since currency is a token of debt owed, it represents counterparty risk and may never be redeemable for assets, particularly where these relate to natural resources. Valuation of this nature can also foster an unhelpful culture of 'what can nature do for me'.

If you have any questions, please do not hesitate to contact me in the first instance.

Yours sincerely



Greg Pycroft
Policy Officer, National Parks Wales

