



NATIONAL PARKS WALES
Britain's breathing spaces

Corporate Planning and Performance Team
Natural resources Wales
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10th January 2014

To Whom it May Concern

National Parks Wales' Response to Planning our future: a consultation

Thank you for this opportunity to respond and comment upon the development of your corporate plan at this early stage.

National Parks Wales (NPW) is a collaborative partnership of the three Welsh National Park Authorities (NPAs) - the Brecon Beacons; the Pembrokeshire Coast and Snowdonia. We share good practice, deliver efficiencies through joint work and promote the role and value of National Parks (NPs) delivering social and economic wellbeing underpinned by a sustainable environment.

Most of what is contained within the document we agree with, however there are omissions that would help us – and others - better understand Natural Resources Wales' direction of travel in the medium to long term. Our comments, which are not the property of any single section come under *question 21*.

First, the consultation document fails to refer to or acknowledge the Welsh Government legislative developments taking place in parallel. The Environment Bill White Paper if passed by the National Assembly for Wales in its current form will reform NRW's statutory framework – impacting upon the role of NRW and the means of delivery.

These reforms are potentially far reaching – for instance, NRW may have a role developing markets for ecosystem services while also acting as regulator. It would be useful to better understand how these proposals are being addressed corporately. We assume there is a rationale behind the approach you have adopted?

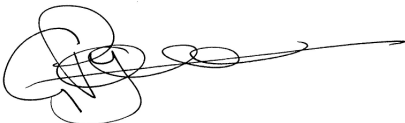


Our second point concerns landscape, or more specifically, its absence from *Planning our future*. As a member of the National Park/protected landscape family it would be remiss of us not to note the near total absence of landscape, and protected landscapes in particular, from the document. We would recommend that this needs to be corrected in future iterations and especially within NRW's corporate plan. Since Wales is a signatory of the European Landscape Convention we would expect landscape concepts to be embedded into NRW's corporate policies. NRW is Wales' foremost landscape advisory body, since it absorbed this responsibility from the Countryside Council for Wales.

We along with AONBs - and a growing list of organisations with an interest in the value of landscapes to Wales - will be looking to NRW for support, advice and guidance. It is envisaged that once the policy statement for protected landscapes is adopted by the Welsh Government NRW will have some form of "soft" regulatory responsibility to assist NPAs, AONBs and other public bodies meet their duty to have regard for the special qualities of protected landscapes (s62 & s84 Environment Act 1995). We trust that reference to this will find its way into your corporate plan.

Once again, thank you for this opportunity to comment, at such an early stage in the development of your corporate plan. If you wish to discuss any of the points raised in this response, please feel free to contact me in the first instance.

Yours sincerely



Greg Pycroft
Policy Officer, National Parks Wales



BRECON BEACONS
NATIONAL PARK



Parc Cenedlaethol
Arfordir Penfro
Pembrokeshire Coast
National Park



SNOWDONIA
NATIONAL PARK