

# Parciau Cenedlaethol Cymru

Tystiolaeth i'r Comisiwn ar Lywodraethu a Darparu Gwasanaethau Cyhoeddus

## National Parks Wales

Evidence to the Commission on Public Service Governance and Delivery



# **National Parks Wales**

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### **1.0 Introduction**

1.1 National Parks Wales welcomes the opportunity to respond to the Commission on Public Service Governance and Delivery. In this submission we explain the origin, role and benefits of National Parks and the special purpose bodies that manage them (the National Park Authorities). We have addressed each of the six key inter-related areas of focus identified within the Call for Evidence and would be pleased to provide more details on any of the enclosed.

1.2 National Parks were created to protect the most beautiful and imposing landscapes in the UK and to facilitate their enjoyment by the public. Following a long campaign by people for greater access to the countryside, National Parks were set up as part of the national post-war reconstruction that took place in the 1950s. They were created alongside other major public services such as the National Health Service. Unlike some of their international counterparts, they are not wilderness areas and are formed by and valued because of the interaction between people and the landscape.

1.3 There are three National Parks in Wales covering an area of 4,122 sq. km, which represents approximately 20% of the land area of Wales. Snowdonia was designated in 1951, the Pembrokeshire Coast in 1952 and the Brecon Beacons in 1957.

1.4 Each National Park is managed by a National Park Authority (NPA). The three Welsh NPAs work in partnership as National Parks Wales, which provides NPAs with the means of identifying issues of joint interest and agreeing outputs. Information and experiences are shared between NPAs.

### **Value of National Parks**

1.5 Wales' National Parks are internationally recognised and are of huge value to Wales environmentally, socially and economically. They are part of a worldwide movement of international significance and the NPAs help to put Wales on the international map through their international links. The NPAs participate in a number of skill sharing and knowledge transfer programmes with their international counterparts e.g. Snowdonia NPA has trained Norwegian Park Rangers on footpath restoration. Best practice is also shared through the Europarc Federation<sup>1</sup> and twinning arrangements, as well as bilateral agreements e.g. the UK National Parks Association has signed a memorandum of understanding with the China Association of National Parks<sup>2</sup>.

1.6 The NPAs help to promote Wales through securing and promoting projects of international significance, such as Wales' first international dark sky reserve, a status awarded to the Brecon Beacons<sup>3</sup>. This generated worldwide publicity which has increased interest in the area and spurred a new interest in 'astro-tourism' in the Brecon Beacons. Local hotels and B&Bs appeal to astro-tourists by offering star maps and telescopes, and have learned more about the night sky through the Brecon Beacons NPA's Dark Sky Ambassador course.

1.7 There are many other examples of where National Parks have helped Wales to achieve international recognition. For example, in 2010 the Pembrokeshire Coast was voted

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<sup>1</sup> <http://www.europarc.org/home/>

<sup>2</sup> <http://www.nnpa.org.uk/parklive/news/news-pages/chinese-delegation-visits-northumberland-national-park>

<sup>3</sup> <http://www.bbc.co.uk/news/uk-wales-21496562>

the second best coastline in the World (and the best in Europe) for sustainable tourism management<sup>4</sup>.

1.8 A soon to be published report by ARUP has found that the three National Parks are a significant part of the Welsh economy (annex 1).

**1.9 Overall, the National Park economies account for £557 million Gross Value Added with their environments directly supporting 10,738 jobs within their boundaries and a further 2,033 jobs across Wales. The Parks receive 12 million visitors per annum who spend an estimated £1 billion on goods and services each year.**

1.10 The value of National Parks has increased since devolution – four new National Parks have been introduced in England and Scotland with strong public support (the New Forest, South Downs, Cairngorms and Loch Lomond and the Trossachs). National Parks are ‘well-being factories’ contributing a wide range of health and social benefits in an increasingly complex and pressurised world.

### **Remit of National Park Authorities**

1.11 NPAs have a legal basis and are charged with the achievement of National Park statutory purposes<sup>5</sup> which are: conserving and enhancing the area’s natural beauty, wildlife and cultural heritage, and promoting opportunities for the understanding and enjoyment of its special qualities by the public. They have a duty, in pursuing their statutory purposes, to seek to foster the economic and social well-being of local communities within their National Park, in co-operation with local authorities and bodies whose functions include the promotion of economic or social development.

### **The importance of independence**

1.12 When the National Parks were first established they were managed through committees of County Councils. In the early 1990s, an independent panel chaired by Cardiff University Professor Ron Edwards reviewed the history and operation of the Parks over the past 40 years and set out a vision for their future, culminating in a report known as the Edwards report<sup>6</sup>. **One of the review’s principal recommendations was for the creation of free-standing, independent National Park Authorities as local government management was not delivering National Park purposes effectively.**

1.13 The review concluded that:

“Independence would allow the National Park Authority to set its own agenda and pursue it resolutely... Despite evidence of some increasing flexibility by county councils over the devolution of responsibilities, national parks need authorities with complete freedom to manage finance, personnel and property resources and to organise their own administrative procedures, including the commissioning of professional services.”

**1.14 The principle of and rationale for free-standing, independent authorities was accepted by the Government, which agreed that a county council, with its wider remit, would not be able to give the same focus and resources to a National Park that an NPA would.**

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<sup>4</sup> National Geographic Magazine poll of 340 travel journalists

<sup>5</sup> s5(1) of the 1949 National Parks and Access to the Countryside Act, updated by the 1995 Environment Act

<sup>6</sup> Report of the National Parks Review Panel, the Countryside Commission (1991)

1.15 It was recognised at the time that: “Those authorities will help to ensure that the parks are properly financed and that the local people who live in them will have an effective voice in their running..... a major benefit of an improved administrative framework for each park will be that the authorities will be able to spend less time on bureaucracy and more time on working closely with all their partners.”<sup>7</sup>

1.16 Provision was subsequently made for the establishment of free-standing, independent authorities through the Environment Act 1995. This received cross-party support in both Houses of Parliament.

1.17 The NPAs in Wales were set up in 1996. Initially, Welsh Office Circular 13/99 provided strategic guidance to them on the practical implementation of their core functions. In 2004, the Welsh Government published the results of an independent review of the National Parks. In 2007, the Welsh Government produced a policy statement on National Parks and NPAs<sup>8</sup> and is currently consulting on a replacement policy statement<sup>9</sup>.

**1.18 Each of these reviews and statements has reaffirmed the importance and benefits of Wales’ National Parks, their significance to a modern day Wales and the continuing importance of independent NPAs to manage National Parks.**

#### **Added value**

1.19 NPAs have substantial additional expertise available to them compared to the dwindling specialist services of local authorities. The most obvious manifestation of this is their staff. This includes rangers, estates workers, farm advisers, ecologists, woodland advisers, Public Rights of Way officers, access advisers and tourism and recreation specialists. In addition, the NPAs have a large, active and highly motivated volunteer reserve to call upon to support the delivery of their purposes e.g. in the Brecon Beacons in 2012, 147 volunteers provided 10,000 hours of volunteer time, worth almost £110,000.

1.20 There is no duplication with local government; almost all of the functions are different. **Transfer of NPA functions to local government would in effect recreate a model that has previously been tried and failed in terms of delivering National Park purposes.**

1.21 The structure of local government is markedly different from that in 1996 with Cabinet-style Councils now the norm. An advisory committee on National Parks within a Council would be even less effective than when it was considered and rejected by the Edwards Review.

1.22 As far as we are aware the views of some local authority leaders that NPA functions should be delivered by their respective councils are not formal corporate positions of their authorities. There is no evidence to suggest that this would offer better value for public money, or that National Park purposes would be delivered more effectively by local authorities, who have a much wider remit and are themselves facing a sustained period of change and significantly reducing resources. We note that the WLGA has made no comments on NPA functions in its response to the Commission.

1.23 Two communities within Snowdonia (represented by Llanberis Community Council and Ffestiniog Town Council) have made a formal request to be included within the National

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<sup>7</sup> Hansard, 16 March 1994, Col. 326

<sup>8</sup> Policy Statement for National Parks and National Park Authorities, Welsh Government (March, 2007) <http://wales.gov.uk/about/cabinet/cabinetstatements/2007/1321477/?lang=en>

<sup>9</sup> Consultation on the draft Policy Statement for Protected Landscapes in Wales, Welsh Government (June 2013) <http://wales.gov.uk/consultations/cultureandsport/landscape/?lang=en>

Park because of the benefits that they perceive this would bring for their communities and the competitive advantage provided by the National Park brand (annexes 2 and 3).

## **2.0 Performance**

2.1 This section considers the performance of NPAs on some of its key functions, including development planning and management (which yields the most statistics due to its statutory nature). The processes for monitoring the corporate performance of NPAs are explained in Sections 5 and 7. While the Welsh NPAs compare very favourably and in many instances outperform local authorities, precise performance comparisons with the English and Scottish NPAs are difficult to make due to different data reporting and monitoring requirements. Broadly, performance in key areas such as planning, education, rights of way management and building conservation is comparable with NPAs in England.

### **Access and Public Rights of Way**

2.2 NPAs have a long history of innovative working and pioneering new approaches to access management, which have been later adopted as standard practice by local authorities. The excellent performance of the NPAs in the management of countryside access and recreation was recognised by the Wales Audit Office in 2006<sup>10</sup>, with examples of best practice in partnership working with landowners and the private sector, environmental education, promotion of access opportunities via the internet and the integration of public transport with countryside access provision.

2.3 In recognition of the primacy of public rights of way in the delivery of their second statutory purpose, the NPAs have taken a proactive approach to the management of public rights of way. Brecon Beacons and Pembrokeshire Coast NPAs have formal delegation agreements with their host local authorities, transferring the statutory responsibility for the maintenance of public rights of way to the NPAs. Snowdonia NPA has a service level agreement with one of its local authorities.

2.4 The proportion of public rights of way that are classed as easy to use in the National Parks is well above the Wales average (public rights of way currently easy to use are 76% in the Brecon Beacons and 78% in the Pembrokeshire Coast; the performance indicator for Wales is 55%<sup>11</sup>).

2.5 NPAs' rich experience in the management of public rights of way has enabled them to inform national guidance such as the CCW publications 'By All Reasonable Means: Inclusive Access to the Outdoors for Disabled People' and 'Managing Public Access'.

2.6 NPAs have also advised on the introduction of new legislation such as the Countryside and Rights of Way Act 2000 and piloted the establishment of Local Access Forums and the preparation of Rights Of Way Improvement Plans to assist in the development of regulations and statutory guidance on the implementation of these new duties.

### **Building Conservation**

2.7 Each of the three NPAs proactively undertakes a programme of building conservation work, often in partnership with CADW<sup>12</sup>, which benefits townscapes and the local economy. The three NPAs also run historic building grant schemes to improve and protect historic buildings including Buildings at Risk e.g. Snowdonia currently has a budget of £130,000

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<sup>10</sup> Public Access to the Countryside, Wales Audit Office (2006)

<sup>11</sup> Wales Government Data Unit

<sup>12</sup> The Welsh Government's Historic Environment Service <http://cadw.wales.gov.uk/?lang=en>

targeted at removing 3% of the total buildings at risk on the Register annually, the equivalent of 9 buildings.

## **Education**

2.8 NPAs provide a range of education services, which are complementary to the services provided by local education authorities. These include study centres, work with schools and dedicated events.

2.9 The Snowdonia NPA's Environmental Study Centre Plas Tan y Bwlch provides professional courses as well as school and college courses on all types of environmental issues, which enhances people's understanding of the National Park. Every year an average of 25 schools (around 1,200 children) attend day courses and a further 22 schools (around 1,000 children) have residential stays. The NPA also runs educational 'road shows', promoting learning on biodiversity to local schools.

2.10 In the Pembrokeshire Coast over 10,000 pupils attended education events at Carew Castle and Castell Henllys and field-based events led by NPA rangers. Over 2,700 'hard to reach' people took part in organised events through the 'Your Park' and 'Walkability' schemes.

2.11 The Brecon Beacons NPA supports the Government in its Eco-Schools initiative which encourages pupils to engage with issues related to environment and sustainability. Students become key contributors to decisions about reducing the environmental impact of their school. The NPA also supports the Healthy Schools initiative and has worked in partnership with Communities 1<sup>st</sup> Ystradgynlais to develop playground toy chests which help children to enjoy the outdoors.

## **Conservation**

2.12 NPAs have a good track record on delivering conservation objectives including on challenging issues such as restoring Blanket Bog and tackling invasive species such as Rhododendron. In 2012, Snowdonia NPA secured funding from the Ecosystems Resilience and Diversity Fund to run a £35,000 scheme to restore 38ha of blanket bog which includes opportunities for volunteering and educational work for local schools. The scheme is now considered an exemplar project and has been highly commended for its design, operation and outputs.

2.13 The Woollenline<sup>13</sup> project at Pen Trumau in the Black Mountains in the Brecon Beacons National Park uses a highly innovative approach to restore damaged peat bog. Llangynidr-based artist Pip Woolf runs the artistic project which uses lines of wool to protect peat from erosion, and joins local communities together in the process.

2.14 Snowdonia NPA has taken a lead on Rhododendron control over many years. The eradication scheme is worth £800,000 and is administered fully by the NPA due to its specialist knowledge in this area and non-bureaucratic approach to tenders. Contracts for eradication work are awarded locally and provide 30 jobs within the National Park.

## **Social inclusion**

2.15 The Mosaic project currently works with black and minority ethnic communities with the aim of introducing new people to National Parks. This is a partnership project between

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<sup>13</sup> <http://www.beacons-npa.gov.uk/the-authority/communications-and-media/press-releases/may-2013/innovative-brecon-beacons-project-wins-a32-000-park-protector-award>

the Campaign for National Parks, National Park Authorities, National Park Societies and the YHA.

2.16 Mosaic project officers operate in each of the three National Parks, recruit community champions, organise visits and activities and introduce new people to the Parks. This project contributes to the NPAs' shared aim to make sure that everyone has an equal opportunity to experience National Parks and to share in the health, cultural, educational and environmental benefits that they offer.

## Planning

2.17 The role of the planning system to regulate the use of land in the public interest is a challenging one and is at its most challenging in sensitive landscapes such as National Parks. In 2011 an evaluation<sup>14</sup> of planning services in statutory designated landscapes in Wales was undertaken by Land Use Consultants for the Welsh Government (annex 4). This found that member training is done very well in the three Welsh NPAs with regular and joint training sessions and pre-application discussions encouraged and found to be useful.

2.18 The evaluation supported integration with constituent local authorities and collaboration on service delivery and found that all three NPAs have entered into formal arrangements to share resources/expertise e.g. Pembrokeshire Coast NPA and Brecon Beacons NPA share a minerals planning applications officer with Carmarthenshire County Council and Brecon Beacons NPA has in recent years jointly funded an affordable housing officer with Powys County Council. Similar arrangements exist in Snowdonia. Significantly, the evaluation concluded that:

**...the key advantage of planning to National Park boundaries is that NPAs can adopt a consistent approach across the whole of the National Park area in their Local Development Plan regardless of local authority boundaries. This allows clear focus to be given to National Park purposes and allows alignment with the National Park Management Plan, creating a coherent approach and a clear focus across each National Park. (para 4.6).**

...there is recognition of the importance of statutory designated landscapes having their own clear identity, separate from that of the constituent local authority(s), to try and ensure consistency in the delivery of planning functions across the statutory landscape. (para 4.18)

2.19 The evaluation found many examples of good practice within NPAs, as well as good performance in relation to national indicators for planning service delivery. **At the local level, each National Park local development plan was found to provide a consistent policy context for planning to the boundary of the statutory designated landscape, in line with National Park purposes (this should be contrasted with the weak and inconsistent position the evaluation found in AONBs in which the planning system is managed by the constituent local authorities).**

2.20 Without an NPA planning function there would be an inconsistent approach to the management of development due to the large number of local authorities involved (e.g. there are nine unitary authorities in the Brecon Beacons National Park) and the resulting lack of coherence between management and development planning. This would undermine the delivery of National Park purposes. The importance of planning in supporting biodiversity in National Parks has been recognised by the Minister in his strategic grant letter for 2013-14 (annex 5).

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<sup>14</sup> Delivery of Planning Services in Statutory Designated Landscapes in Wales, prepared for Planning Division of the Welsh Government by LUC, (August 2012)

2.21 All three Welsh NPAs have made excellent progress on local development plans<sup>15</sup>. Pembrokeshire Coast NPA was the first local authority in Wales to succeed in getting its plan adopted, Snowdonia NPA achieved adoption in 2011 (and was the first in North Wales to adopt) and Brecon Beacons NPA will achieve adoption later in 2013. This means that the NPAs are outperforming several other local authorities (including Gwynedd, Powys, Monmouthshire and Carmarthenshire) and that communities and businesses within National Parks have a more certain and up to date policy framework to guide their needs and aspirations than their neighbours. This proactive approach to plan development has resulted in NPAs pioneering new policy approaches in Wales e.g. the Pembrokeshire Coast NPA was one of the first authorities in Wales to introduce commuted payments on single dwelling proposals to support affordable housing.

2.22 On development management, the three NPAs perform as well as other rural local authorities. The NPAs have a good track-record in operating a responsive planning service e.g. in the Pembrokeshire Coast 89% of Planning Enforcement cases are resolved within 12 weeks.

2.23 The most recent planning statistics<sup>16</sup> from the Welsh Government on speed of determining planning applications is included in annex 6. This shows that the NPAs' average speed of determination (about 67%) is on a par with that of the 9 rural local planning authorities (about 68%).

2.24 NPAs undertake regular surveys of users as part of service monitoring and improvement. In the Brecon Beacons planning customers' overall satisfaction ratings<sup>17</sup> with the service received have increased from 76% in 2010-11, to 88% in 2011-12 to 91% in 2012-13. In Snowdonia, overall satisfaction with the planning service was rated 93% by planning applicants in 2012-13, with satisfaction rates for advice received by planning officers at 97%. In the Pembrokeshire Coast, the overall satisfaction with the service in 2012/13 was 85%. Each NPA has a planning service improvement plan which is regularly monitored and updated.

2.25 It can be seen therefore that National Park status and NPAs' role as planning authorities are not a bar to positive planning or good performance, as is perceived by some. Further evidence of this includes the recent establishment of two enterprise zones within National Parks – Haven Waterway in the Pembrokeshire Coast and former development sites at Trawsfynydd and Llanbedr in Snowdonia<sup>18</sup>. Major developments can and do take place within National Parks e.g. the South Hook LNG plant in the Pembrokeshire Coast<sup>19</sup>.

## **Affordable housing**

2.26 NPAs address the challenge of the shortage of affordable housing in partnership with local housing authorities and housing associations e.g. by supporting the work of Rural Housing Enablers who work on behalf of local communities to carry out housing need surveys and come up with tailor-made solutions to meet identified local housing need.

2.27 The Rural Housing Enabler Projects have been successful in bringing together housing and planning professionals. The initiatives have produced concrete results in providing small scale, low cost affordable housing with improved communication between the

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<sup>15</sup> <http://wales.gov.uk/docs/desh/policy/130426development-plan-progress-en.pdf>

<sup>16</sup> <http://wales.gov.uk/topics/planning/planningstats/development-control-quarterly-survey/january-to-march-2013/?lang=en>

<sup>17</sup> Customers who viewed the service as fair and above

<sup>18</sup> <http://enterprisezones.wales.gov.uk/enterprise-zone-locations/ebbw-vale/communications>

<sup>19</sup> <http://www.southhooklng.co.uk/>



essential players. This approach resulted in the following outcomes in Snowdonia in 2012-13:

| <b>Residential Completions</b> | <b>%</b> | <b>Residential Planning Permissions</b> | <b>%</b> |
|--------------------------------|----------|---|----------|
| Open market                    | 28.1     | Open market                             | 35.7     |
| Affordable                     | 64.9     | Affordable                              | 54.8     |
| Agri Workers Dwelling          | 7.0      | Rural Enterprise Dwelling               | 9.5      |

## Renewable energy

2.28 NPAs have adopted a positive approach to renewable energy developments, as can be seen from annex 7. Between April 2007 and March 2011 on average 85.8% of applications were approved.

## Case for new powers

2.29 Rather than emasculating NPA powers or functions, we believe that there may be merit in extending the range of powers available to NPAs which would facilitate the delivery of a more complete public service and greater join-up on delivery. There are a number of areas that could be looked at:

- **Rights of way management** – the public rights of way system is an essential tool for delivering the second statutory purpose of NPAs to promote opportunities for the understanding and enjoyment of the Park’s special qualities by the public. Local authorities are legally responsible for public rights of way and although some delegate some of their management responsibility to NPAs, this is not done consistently across Wales and is insufficiently resourced;
- **Building regulations** – creating a single service area where NPAs are responsible for both development management and building regulations would provide a more user-friendly service for communities and businesses wishing to undertake works that fell within both regimes;
- **Management of National Nature Reserves** – Natural Resources Wales is undergoing a period of transition and transformation<sup>20</sup>. This presents opportunities for discussion on new forms of partnership working and possible transfer of management responsibility e.g. the partnership management and promotion of Cwm Idwal National Nature Reserve<sup>21</sup> by Snowdonia NPA, Natural Resources Wales and the National Trust could offer valuable lessons for other areas;
- **Destination Management Partnerships** – NPAs already play a strong leadership role within and in developing these partnerships<sup>22</sup>, often because of a lack of local authority focus. This leadership role could be further developed in the future. Much of what NPAs deliver can be regarded as contributions to the local economy through tourism – path work, information provision, interpretation, traffic management, development management etc. Recognition of this leadership role of NPAs by Visit Wales would be helpful in enabling NPAs to develop their leadership ambitions and to deliver cohesive and sustainable destination management and development;

<sup>20</sup> Natural Resources Wales 2013-14 Business Plan <http://naturalresourceswales.gov.uk/content/docs/pdfs/our-work/about-us/business-plan-2013-2014-E.pdf?lang=en>

<sup>21</sup> <http://www.ccw.gov.uk/landscape--wildlife/protecting-our-landscape/special-landscapes--sites/protected-landscape/national-nature-reserves/cwm-idwal.aspx?lang=en>

<sup>22</sup> <http://www.dm.wales.com/content/create-destination-partnership>

- **Sustainable Development** – the NPAs are seen as leading lights on sustainable development and as key authorities to take forward the Future Generations Bill. The Welsh Government regards the National Parks as exemplars and pioneers of sustainable development<sup>23</sup> and the NPAs operate successful Sustainable Development Funds. Highlighting the importance of their sustainable development role within the new Policy Statement will assist NPAs in their work to embed sustainable development as their central organising principle.

### 3.0 Scale and capability

3.1 The relatively small scale nature of NPAs has several distinct advantages for service delivery:

- **Reduces the potential for bureaucracy and enhances delivery capability and service quality** – as evidenced by the NPAs' performance on the adoption of Local Development Plans (see Section 2);
- **Promotes accessibility and responsiveness of decision makers** – anecdotal evidence from the Brecon Beacons NPA is that community council representatives greatly value their relationship with senior NPA representatives. In 2012/13 28 of the 52 Town and Community Councils within the Brecon Beacons National Park actively participated in the Community Council Charter developed by the NPA and 17 Councils were direct signatories to the Charter;
- **Provides a close interface with farmers and landowners** – NPAs work with hundreds of landowners to help them to make the most of the wildlife, heritage and access opportunities that they have on their farms through the provision of advice, practical assistance, capital grants and management payments;
- **Relies on partnership working, delivering more collective value for National Park purposes and communities** e.g. the Brecon Beacons NPA has worked with a number of public and private sector partners to achieve the European Charter for Sustainable Tourism in Protected Areas and the revalidation of Fforest Fawr Geopark – Wales' first Geopark. The positive impact of this collaborative work has been commended by the Welsh Government Minister responsible for National Parks<sup>24</sup>. The Wales Activity Tourism Organisation (WATO)<sup>25</sup> is a good example of Visit Wales funding across all three Parks for outdoor activity management, with the aim of sharing best practice across the outdoor sector in Wales. The Outdoor Charter<sup>26</sup> was piloted by Pembrokeshire Coast NPA and has been adopted by Brecon Beacons and Snowdonia NPAs;
- **Collaboration becomes the norm** achieving significant savings for the public purse. **During 2011-12 the NPAs of Wales saved an estimated £2.2 million through collaborative working.**

3.2 Generally, partnership working in the environment sector works well. There are a significant number of active partnerships and collaborations led by and involving NPAs e.g. the Brecon Beacons NPA and Powys County Council have agreed to work together on

<sup>23</sup> Strategic Grant letter from the Minister for Culture and Sport to the Chairs of the 3 NPAs; consultation draft policy statement on Protected Landscapes

<sup>24</sup> <http://www.beacons-npa.gov.uk/the-authority/communications-and-media/press-releases/march-2013/minister-praises-partnership-working-with-the-private-sector-in-the-national-park>

<sup>25</sup> <http://www.wato.org.uk/>

<sup>26</sup> <http://www.pembrokeshirecoastforum.org.uk/projects/pembrokeshire-outdoor-charter/>

conservation of historic centres such as Brecon and Talgarth and the provision of affordable housing; Pembrokeshire Coast NPA is collaborating with Pembrokeshire County Council, the Environment Agency and Pembrokeshire Biodiversity Partnership on the conservation, sympathetic management and restoration of grassland and meadows.

3.3 However, collaboration is about much more than delivering resource efficiency. It is a crucial way of recruiting public and private finance to the delivery of National Park purposes and often provides the necessary stimulus for projects that would otherwise be unlikely to happen. **Several developments of national significance would not have happened without the drive and commitment of NPAs and their collaborative efforts** e.g. in Snowdonia:

- Hafod Eryri<sup>27</sup> – Snowdon Summit – without the dedication and commitment of the Authority the old building would still be there. The NPA masterminded the complex (£8.5 million) engineering operation that removed the old building and replaced it with the unique, low impact Hafod Eryri, a project that renewed visitor interest in the mountain and made a direct contribution to the local visitor economy. Its partners included the Snowdon Mountain Railway Company and the Snowdonia Society;
- Yr Ysgwrn<sup>28</sup> – the home of Hedd Wyn a Welsh Language Poet who was killed during World War 1 and posthumously awarded the bard's chair at the 1917 National Eisteddfod. Born Ellis Humphrey Evans, he had been awarded several chairs for his poetry, was inspired to take the bardic name Hedd Wyn. The Farmhouse, land and bardic chairs were all saved for the nation by Snowdonia NPA because of the close relationship built up over the years with the local community. Without the NPA's leadership there is no doubt that the collection would have been sold and dispersed. Its partners included the Welsh Government, National Heritage Memorial Fund and the National Museum of Wales.

3.4 It is accepted that there is scope for greater collaboration between the three NPAs on the delivery of corporate services, which could deliver further resource efficiencies. This process has already started – e.g. Brecon Beacons NPA provides some of Pembrokeshire Coast NPA's legal services.

3.5 Greater efficiency in delivering corporate services would allow the NPAs to retain a strong focus on the local delivery of core, front-line services. These cannot be pursued remotely as they require intimate local knowledge of landscape and culture, and working with local partners, local communities and local landowners/managers. The review of NPA governance that will be undertaken by the Welsh Government in 2014 offers an opportunity to review and take forward the progress already made on alternative models for delivering corporate services and support functions.

## 4.0 Complexity

4.1 Public service delivery on natural resource management is complex, not least because ecosystems, habitats and catchments are complex entities; this is one of the reasons why Natural Resources Wales was established by the Welsh Government as a one-stop shop to deliver a more coherent environmental regulatory framework<sup>29</sup>. NPAs provide a complementary service to this by acting as one-stop shops within defined geographical areas, providing expertise, consistent service delivery and connections with communities.

<sup>27</sup> <http://www.eryri-npa.gov.uk/visiting/hafod-eryri>

<sup>28</sup> <http://www.eryri-npa.gov.uk/a-sense-of-place/yr-ysgwrn>

<sup>29</sup> <http://wales.gov.uk/about/cabinet/cabinetstatements/2013/naturalresourceswales/?lang=en>

4.2 NPAs apply their resources and expertise to manage the land within their areas in an integrated way. The integrated stewardship from the co-ordinated skills, expertise and resources available from the NPAs enables a landscape-led and joined-up approach to the stewardship of the countryside. In this integrated approach to the management of the National Parks, each action taken or encouraged by the NPA is designed to deliver several relevant objectives at the same time and to have multiple benefits for National Park purposes so that maximum value for money is derived from the resources employed.

4.3 One of the main tools for achieving this joined-up approach is the National Park Management Plan<sup>30</sup>, which sets out the objectives for the area and guides practical measures for achieving the objectives on the ground. It is a plan for the National Park as a whole and all those who manage it, not solely the NPA, and it is prepared and delivered in partnership with a wide range of bodies. The future of the Park and the state of its natural resources depends on sustained partnerships, particularly in times of limited public finance. NPAs play a pivotal role in facilitating and leading these partnerships.

4.4 The joined-up, integrated approach of NPAs is a good model for dealing with complex issues e.g. Brecon Beacons NPA was instrumental in establishing the Llangorse Lake Advisory Group, which comprises a diverse number of groups. Success in tackling what seemed like an intractable problem required vision and sustained engagement with partners. This has achieved wins for the whole ecosystem as well as riparian habitats, local businesses and Park users.

4.5 National Parks are associated with a strong sense of place, 'bro' or 'locale'. NPAs are active in protecting and promoting the rich cultural heritage of their areas e.g. through Bwrlwm Eryri<sup>31</sup>, an innovative cultural heritage venture established by Snowdonia NPA. The functional coherence of NPAs operating to National Park boundaries is well established (see section 2) and the importance of sense of place is recognised by Natural Resources Wales<sup>32</sup>.

4.6 There are three principal areas where the NPAs consider that further improvements can be made to reduce the complexity of working arrangements which would improve service delivery.

- **Looking at protected landscapes as a system** – this approach is encouraged by international guidelines on protected area management<sup>33</sup> and would entail greater collaboration with Wales' five AONBs. The draft Policy Statement on Protected Landscapes issued for consultation by the Welsh Government<sup>34</sup> provides a framework to allow productive discussion to take place on how this might be achieved in practice, including through a single management plan for all protected landscapes in Wales. Consideration should be given to how such a plan could be integrated with the plans and activities of Natural Resources Wales and how local distinctiveness would be respected. Closer working approaches and the sharing of expertise and good practices between National Parks and AONBs in Wales would be welcome
- **More productive collaborations with local authorities** – while there are many good examples of successful partnership working this can be undermined by political sniping about powers and control of NPAs. The NPAs would welcome a strong steer from the Commission that the state of public finances and the urgent need to address cross-cutting issues such as climate change require co-operation not conflict

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<sup>30</sup> e.g. <http://www.beacons-npa.gov.uk/the-authority/planning/strategy-and-policy/nmp/2010-2015-national-park-management-plan>

<sup>31</sup> <http://www.eryri-npa.gov.uk/a-sense-of-place>

<sup>32</sup> Landmap Guidance Note 4, Landmap and the Cultural Landscape, Natural Resources Wales (May 2013)

<sup>33</sup> <http://data.iucn.org/dbtw-wpd/edocs/paps-016.pdf>

<sup>34</sup> <http://wales.gov.uk/consultations/cultureandsport/landscape/?lang=en>

- **Renewed clarity within the new Policy Statement** that NPAs should be at the forefront of action on climate change, integrated land management and support for upland land management, with sufficient resource provided to enable this to happen

## 5.0 Governance, Delivery and Scrutiny

5.1 NPAs are unique as they are accountable through both the Local Government Measure<sup>35</sup> and the requirements of Assembly Sponsored Public Bodies and are subject to a high degree of regulation. The model of managing National Parks in the UK is recognised internationally as one that respects and engages the interests of local communities in relation to conservation<sup>36</sup>. While the governance of National Parks differs slightly across the UK it always involves both national and local interests. See annexes 8 and 8A for more details.

| Nation   | NPA composition   | Direct elections   |
|----------|---|--|
| England  | Approx. 2/3 local, including parish councillors; 1/3 national | No, but Defra committed subject to resources & demand <sup>37</sup> & pilots in the New Forest & Peak District |
| Wales    | Approx. 2/3 local, 1/3 national                               | No – last considered in 2006 and not taken up  |
| Scotland | Approx. 2/3 local, 1/3 national                               | Yes, a proportion of members are directly elected locally  |

5.2 Successive governments and NPAs have grappled with governance issues for many years. There is no easy solution to managing the tensions that inevitably arise between the pursuit of national objectives and local needs and accountability. The current model of involving both national and local interests, managed by an independent NPA, has struck an appropriate balance between managing these tensions and delivering outcomes of benefit to the whole of Wales. Moving functions back to local government would risk undermining this balance and the coherence and market identity that these areas have acquired over time.

5.3 While traditional models of accountability have involved elected members, modern interpretations offer a range of accountability options for public bodies, including the model of NPAs and that operated by the Local Health Boards.

5.4 NPAs are recognised as exemplars of good governance in local government e.g. all three NPAs have achieved the charter for member development and the Brecon Beacons NPA is one of only two authorities in Wales to have achieved the advanced charter for member development<sup>38</sup>. The Brecon Beacons NPA was one of the first Authorities in Wales to begin webcasting its main committee meetings as part of its commitment to transparency. All three NPAs have held the Investors in People Standard for a number of years.

5.5 NPAs employ a range of techniques to involve people in decisions on service delivery and performance e.g. the Brecon Beacons NPA has worked with Planning Aid Wales<sup>39</sup> to engage communities in the Local Development Plan process (this has been promoted by Planning Aid Wales as best practice on community engagement).

<sup>35</sup> Local Government (Wales) Measure 2011 <http://www.legislation.gov.uk/mwa/2011/4/part/6>

<sup>36</sup> The Welsh National Parks are classified by the IUCN as Category V Protected Landscapes, a status defined by a balanced interaction between people and nature. This has recently been reviewed and re-assigned

<sup>37</sup> Defra update (April 2013)

[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/192247/PB13908-review-of-national-park-governance.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/192247/PB13908-review-of-national-park-governance.pdf)

<sup>38</sup> <http://www.wlga.gov.uk/member-development-charter>

<sup>39</sup> <http://www.planningaidwales.org.uk/how-paw-can-help/training/case-studies>

5.6 Fundamental change to the governance model would therefore, in our view, be a retrograde step that would undermine Wales' credibility on protected landscape management. However, while we believe that the current model of National Park governance is the best for Wales, we recognise that it could be modified in the context set by the Commission and are committed to looking at ways in which this might be done so that our governance arrangements remain fit for purpose.

5.7 The Minister for Culture and Sport has signalled his intention<sup>40</sup> to review the governance arrangements for National Parks once the Commission for Public Service Governance and Delivery has delivered its report. This review will include reflection on the nature of accountability to Welsh Ministers and the administration of the authorities.

5.8 The three NPAs in Wales have a number of active work programmes looking at opportunities for collaboration and the pursuit of shared outcomes e.g. the NPAs have commissioned a study into the joint working opportunities for our planning departments (annex 9). We are also monitoring working arrangements in other parts of the UK such as Scotland, where good progress has been made on collaboration between the two NPAs, including establishing single support platforms where justified by a common need.

5.9 The members of the three Welsh NPAs come together annually at the Welsh members' seminar to learn and share experiences, as well as with member colleagues from the English and Scottish NPAs at an annual seminar for members of all the UK's NPAs. UK National Parks also arranges an annual induction course for new members.

5.10 We will use these studies and learning outcomes to inform the review of governance arrangements that the Welsh Government will be undertaking in 2014.

5.11 Welsh Government scrutiny arrangements of the NPAs are summarised in Section 7 of this submission. The NPAs are also subject to scrutiny by the Wales Audit Office as part of the Wales Programme for Improvement. All three NPAs have received positive improvement letters in April 2013<sup>41</sup> with no statutory recommendations.

## 6.0 Culture and Leadership

6.1 The culture within the three Welsh NPAs is characterised by the following key principles:

- **Recognition of the needs of beneficiaries within service delivery** e.g. in 2012 Pembrokeshire Coast NPA was praised by the Welsh Language Board for its progress on mainstreaming the Welsh language into its policies and strategies
- **High standards of service delivery** e.g. in 2012 Snowdonia NPA received a Customer Service Excellence Standard certificate from the Cabinet Office<sup>42</sup> for achieving an exceptional standard in providing customer service, with particular commendation for listening and understanding the needs of users before investing to improve its service provision. This award has been retained for 2013. Snowdonia NPA has been highly commended by the WLGAs in its Excellence Wales Awards for its response to climate change

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<sup>40</sup> Letter to the Chairs of the 3 NPAs, 10 May 2013

<sup>41</sup> [http://www.wao.gov.uk/assets/englishdocuments/Brecon\\_NPA\\_AIR\\_2013.pdf](http://www.wao.gov.uk/assets/englishdocuments/Brecon_NPA_AIR_2013.pdf)  
[http://www.wao.gov.uk/assets/englishdocuments/Pembrokeshire\\_NPA\\_AIR\\_English.pdf](http://www.wao.gov.uk/assets/englishdocuments/Pembrokeshire_NPA_AIR_English.pdf)  
[http://www.wao.gov.uk/assets/englishdocuments/Snowdonia\\_NPA\\_AIR\\_2013\\_English.pdf](http://www.wao.gov.uk/assets/englishdocuments/Snowdonia_NPA_AIR_2013_English.pdf)

<sup>42</sup> <http://www.eryri-npa.gov.uk/park-authority/newsroom/press-releases-2012/2012-09-05>

- **Efficient and effective corporate planning and resource management:** the finances of each NPA are managed soundly resulting in debt-free authorities; each NPA has a corporate management team that works with the Chief Executive to provide leadership, vision and strategic direction, define corporate culture and promote core values and ensure statutory obligations are met and sound corporate governance; NPAs receive very low levels of complaints from the public or service users, including to the ombudsman
- **Pursuit of innovation** – the NPAs use their partnerships and Sustainable Development Funds to support and foster innovation e.g. Pembrokeshire Coast NPA’s creation of the nationally acclaimed coastal land management scheme “Conserving the Coastal Slopes”, which has now evolved into the Conserving the Park land management scheme, creating the first local conservation grazing scheme in Wales
- **Continual performance review and improvement** – Brecon Beacons NPA and Pembrokeshire Coast NPA undertook a pilot project to develop a scrutiny model for NPAs. A scrutiny tool kit was produced along with reports on the contribution of the Sustainable Development Fund and the management of Public Rights of Way. Since then both NPAs have undertaken scrutiny projects, with the Pembrokeshire Coast scrutinising the delivery of its affordable housing policies. All three NPAs are about to commence a joint scrutiny of economic development in the National Parks
- **Trailblazing and exemplifying sustainable development** e.g. the Brecon Beacons NPA kick-started the Green Valleys initiative<sup>43</sup> by providing advice, funding and officer time through a secondment. This scheme is now widely recognised as a leader in community involvement in sustainable development. Snowdonia NPA has achieved Level 3 of the Seren Environmental Management Standard and Pembrokeshire Coast NPA has achieved Green Dragon level 4.

6.2 As explained in Section 3, NPAs are experts in harnessing the resources and opportunities that flow from partnership working and applying these for the benefit of service delivery in the National Park e.g. the Brecon Beacons NPA leads a diverse partnership to control the impacts of recreation in the popular waterfalls area near Pontneddfechan, which is internationally important for its wildlife. This has reduced impacts and delivered footpath restoration, renewed signage and interpretation, a gorge walking code of conduct (the development of which was led by outdoor providers) and increased awareness of the area’s rich natural and cultural history.

6.3 NPAs demonstrate leadership within Wales in a number of areas e.g. on social inclusion the Pembrokeshire Coast NPA has been active in engaging black and minority ethnic groups through the Mosaic Cymru initiative<sup>44</sup>, children and excluded young people through its work with schools and Go4it<sup>45</sup> and in promoting the use of the National Park for health and well being through Walkability<sup>46</sup>.

<sup>43</sup> <http://www.thegreenvalleys.org/>

<sup>44</sup> Across Wales 53 Mosaic champions have introduced 580 people from BME urban communities to National Parks since 2012

[http://www.pembrokeshirecoast.org.uk/Files/files/Committee/NPA/13\\_06\\_26\\_Ordinary/38\\_13%20Mosaic%20Project%20Update.pdf](http://www.pembrokeshirecoast.org.uk/Files/files/Committee/NPA/13_06_26_Ordinary/38_13%20Mosaic%20Project%20Update.pdf)

<sup>45</sup> <http://www.pembrokeshirecoast.org.uk/?PID=192>

<sup>46</sup> <http://www.pembrokeshirecoast.org.uk/?PID=67&NewsItem=1311>

## 7.0 Welsh Government and National Assembly for Wales

7.1 The Welsh Government sets clear priorities and outcomes for the NPAs in Wales in the form of a strategic grant letter (annex 5), which is published each Spring. This also includes details of the resources available to the Authorities to deliver these priorities.

7.2 For 2013-14<sup>47</sup>, the priorities include:

- National Parks should be exemplars of sustainable development; living, working landscapes with vibrant rural economies, thriving ecosystems and biodiversity, and extensive recreation opportunities;
- A more integrated approach to managing the natural environment that improves the health of ecosystems;
- Collaboration on cross-cutting issues such as economic development, housing, transport, cultural heritage and education.

7.3 The NPAs are funded by a Grant from the Welsh Government, with additional capital funding for specific projects and an amount levied from the Parks' constituent local authorities (which is included within those authorities' local government settlement).

| National Park Authority | National Park Grant (2013-14) | With levy & additional capital funding | Additional funds raised by the NPA (2012-13) |
|-------------------------|-------------------------------|--|--|
| Brecon Beacons          | £3,387,834                    | £4,630,779                             | £1,821,043                                   |
| Pembrokeshire Coast     | £3,540,433                    | £4,837,244                             | £2,044,000                                   |
| Snowdonia               | £4,488,733                    | £6,101,644                             | £1,528,847                                   |

7.4 £200,000 of this grant is ring-fenced by each NPA to support sustainable development projects within or in close proximity to the Parks, which helps to embed sustainable development as a central organising principle of NPAs and promote innovation.

7.5 These Sustainable Development Funds have contributed to a wide range of projects including conservation, education, renewable energy and social inclusion e.g. in the Pembrokeshire Coast projects include pilot construction of an affordable timber house<sup>48</sup> (with the objective of factory production and construction of a house for about £50,000) and the recycling of waste vegetable oil into a renewable and sustainable fuel source<sup>49</sup>.

7.6 The Funds are also concerned with the future viability of the communities within National Parks e.g. in Snowdonia the Fund has supported a Skills Centre in Dolgellau which will provide training for learners 14-16, 16-19, adults and businesses to increase the present and future skills level, in order to promote the green economy in Meirionnydd and Mid Wales. It is envisaged that 817 individuals will benefit from the centre over the next three years.

7.7 The Funds also provide direct financial support to local businesses e.g. in the Brecon Beacons support was given to the Myddfai trading company, which aims to support social, recreational, welfare and employment opportunities in and around Myddfai, helping this small business to achieve economies of scale and to compete in difficult economic conditions.

<sup>47</sup> Letter from the Minister for Culture and Sport to the Chairs of the 3 NPAs (10 May 2013)

<sup>48</sup> [http://www.coedcymru.org.uk/images/user/CABAN%20UNNOS%20FLYER%20C%20\(2\).pdf](http://www.coedcymru.org.uk/images/user/CABAN%20UNNOS%20FLYER%20C%20(2).pdf)

<sup>49</sup> <http://www.pembrokeshirecoast.org.uk/?PID=467&SDFID=32>



7.8 The Sustainable Development Funds have a strong multiplier effect in terms of cash matching, volunteer hours and in-kind contributions<sup>50</sup>. For every £1 granted by the fund, approximately £5 is attracted to the National Parks.

7.9 NPAs have an excellent track record in raising additional income through grants and other sources – e.g. in 2012-13 the Brecon Beacons generated £1,821,043 in grants and funding, equivalent to 29% of the total operating cost of the Authority. The three NPAs generated additional funds of over £5 million in 2012-13.

7.10 Welsh Government policy on National Parks is set out in a Policy Statement on National Parks and NPAs<sup>51</sup> with the current vision set out in annex 10; a replacement Policy Statement<sup>52</sup> has been issued for public consultation until 20 September 2013. Currently, the Welsh Government appoints one-third of NPA members<sup>53</sup> who are highly valued because of the skills and national perspective that they bring to the NPAs.

7.11 The NPAs are subject to a number of scrutiny arrangements due to their status as Assembly Sponsored Public Bodies. This includes six-monthly reporting on performance against the priorities in the Strategic Grant Letter, six-monthly meetings with the Minister, performance indicators for the Sustainable Development Fund and participation in scrutiny inquiries by the National Assembly for Wales Environment and Sustainability Committee<sup>54</sup>. National Parks are the responsibility of the Minister for Culture and Sport<sup>55</sup>.

**7.12 The current sponsorship and scrutiny arrangements provide the Welsh Government with direct powers and control over Wales' National Parks, which is appropriate given their national and international significance. The ceding of powers from NPAs to local government would remove these powers from the Welsh Government, which could lead to inconsistent services and standards, a loss of cohesive management, reduced levels of funding and increased parochialism.**

## 8.0 Conclusion

8.1 This submission sets out how the three NPAs deliver value for Wales' environment and economy, local communities within their boundaries and the millions of visitors they receive each year. It also explains how we contribute to the international reputation of Wales as a nation committed to sustainable development.

8.2 While we are constantly striving to achieve and share best practice and have an excellent record on service delivery and improvement, including on planning, we are receptive to new ways of working that will improve our ability to deliver effectively and efficiently.

8.3 The Minister for Culture and Sport has signalled his intention<sup>56</sup> to review the governance arrangements for National Parks once the Commission for Public Service Governance and Delivery has delivered its report. This review will include reflection on the nature of accountability to Welsh Ministers and the administration of the authorities.

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<sup>50</sup> See pages 4 and 5 of <http://www.beacons-npa.gov.uk/the-authority/who-we-are/scrutiny/sustainable-development-fund-scrutiny-report>

<sup>51</sup> Policy Statement for National Parks and National Park Authorities, Welsh Government (March 2007) <http://wales.gov.uk/about/cabinet/cabinetstatements/2007/1321477/?lang=en>

<sup>52</sup> Consultation on the draft Policy Statement for Protected Landscapes in Wales, Welsh Government (June 2013)

<sup>53</sup> Letter from Welsh Government to Powys County Council [http://www.powys.gov.uk/rep\\_2012-07-12cc1\\_115.2a\\_en.pdf?id=47](http://www.powys.gov.uk/rep_2012-07-12cc1_115.2a_en.pdf?id=47)

<sup>54</sup> <http://www.senedd.assemblywales.org/mgCommitteeDetails.aspx?ID=225>

<sup>55</sup> <http://wales.gov.uk/topics/cultureandsport/?lang=en>

<sup>56</sup> Letter to the Chairs of the 3 NPAs, 10 May 2013

8.4 We look forward to discussing this submission with the Commission and with the Welsh Government during its review of our governance arrangements.

## **List of annexes**

### **Annex 1**

Valuing Wales' National Parks. ARUP. August 2013

### **Annex 2**

Letter from Llanberis Community Council to Snowdonia NPA (5 December 2005)

### **Annex 3**

Letter from Ffestiniog Town Council to Snowdonia NPA (14 October 2009)

### **Annex 4**

Delivery of Planning Services in Statutory Designated Landscapes in Wales. Summary Report from Phase 1. Prepared for the Welsh Government by Land Use Consultants. August 2011

### **Annex 5**

Strategic grant letter for 2013-14 and funding annex

### **Annex 6**

Table of speed of determining planning applications. Welsh Government. January to March 2013

### **Annex 7**

Renewable energy schemes determined by NPAs between April 2007 and March 2011

### **Annex 8 and 8A**

Governance, Delivery and Scrutiny in National Park Authorities  
The Golden Thread – NPA corporate planning and improvement framework

### **Annex 9**

Study into Joint Working Opportunities for the Planning Departments of the three Welsh National Parks. Interim Report for Steering Group. Land Use Consultants. June 2013

### **Annex 10**

Welsh Government vision for National Parks (2007 Policy Statement)