



Campaign for the Protection of Rural Wales
Brecon and Radnor Branch

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Brecon Beacons National Park 'NPMP21 Issues, Visions and Objectives' Public Consultation CPRW Brecon & Radnor Response

The Brecon & Radnor Branch of CPRW (CPRW-B&R) is grateful for the opportunity to comment on the draft NPMP21 Issues, Visions and Objectives document. We are also grateful for the extension allowed us to submit our comments. The Campaign for the Protection of Rural Wales is Wales' foremost charity for protection and enhancement of our landscapes, environment and Welsh communities.

Key external policy drivers

The infographic below appears on the opening page of the draft document, and suggests that the policy drivers shown represent the 4 overriding external drivers shaping the new management plan. The role of the IUCN Management Principles and Welsh Government's 2018 policy document for protected landscapes 'Valued and Resilient' as drivers for the National Park Management Plan is clear, but we have some questions around the inclusion of the other two categories.

The vision and aspirations of our new National Park Management Plan (NPMP 21) is framed by the following external policy drivers



Sustainable Management of Natural Resources (SMNR) & catastrophic biodiversity loss: Welsh Govt's 'Valued and Resilient' sets out under the theme 'Resilient Environments' that National Parks and AONBs must become '*exemplars for the sustainable management of natural resources*' making it redundant to include SMNR as a separate policy driver. SMNR is surely in any case more a tool or way of working than a driver.

NPMP21 clearly recognises the urgency of the biodiversity declines and ecosystem damage which is amply evidenced in the many recent reports cited. Would it not be logical to identify the catastrophic biodiversity crisis as a key external driver within this infographic in the place of SMNR?

20 minute places: 20 minute neighbourhoods, i.e. neighbourhoods where residents can access all or almost all everyday needs within a 20 minute walk from home, are surely essentially an urban concept, and Sophie Howe, the Future Generations Commissioner, has recommended adoption of the concept for Welsh urban planning. We see that the Scottish Government is currently investigating application of the concept to rural areas but have not found any clarity as to how this might work. Might the objectives, active travel & reducing car travel and thriving neighbourhoods with adequate local services, underlying this concept be best addressed within the BBNP, at least in the shorter term, by a focus on regeneration of town and village centres, particularly important post-Covid, and increased access across the Park to affordable public transport? Without a clearer picture of what '20 minute places' means for all Park residents, urban and rural, we're not convinced of the value of including this as a key external driver.

Strategic policies and objectives

State of Nature in the National Park & Landscape and nature recovery: Strategic Policy:

CPRW-B&R welcomes the recognition that past measures have failed to conserve biodiversity and ecosystems and is pleased to see the intention within the draft strategic policy to bring about a step change in land management practices. We agree this is essential to fulfil the statutory purposes of the Park and reverse biodiversity declines.

The draft strategic policy sets out the following 4 main areas for action:

1. To make the Park an exemplar of SMNR based solutions for climate change working collaboratively with land managers
2. To return our protected water bodies to good status, reduce flood risk, and maintain those improvements
3. To work with our agricultural community to ensure that the Sustainable Farming Scheme delivers the best outcomes for the natural environment of the National Park
4. To ensure all development and land use change delivers a net benefit for biodiversity and provides broader environmental net-gain, demonstrating carbon neutrality where relevant

The figure of 67,000 Ha, only (roughly) half the area of the NP, in which the BBNPA will '*look to increase nature recovery*' requires some explanation.

Welsh Government's Sustainable Farming Scheme has the potential to make a significant contribution to nature recovery within the park. At the same time the BBNPA, as owner of approximately 13% of the Park's land area, is in a position to lead by example by regenerative management of its own landholdings. In total almost 30% of the Park area is in the ownership of public bodies making partnership with these bodies essential to the delivery of nature recovery.

There is increasing recognition that the intensification of agriculture since the mid twentieth century and resulting changes to our food systems have harmed both the health of ecosystems and human health. The BBNP has huge potential to showcase different ways of working. The Park is home to many producers of quality food and innovative initiatives such as Our Food Crickhowell. Modelled on a German project OFC sets out to create a local food economy with multiple benefits including improving farm incomes and promoting sustainable regional development. We very much hope the BBNPA will be looking to support and build on such positive local initiatives.

Strong planning policies consistently applied, coupled with enforcement of any significant breaches, will be critical to the achievement of nature recovery objectives and to ensure that environmental net benefits are delivered and represent a genuine benefit. This will increase public confidence in the sincerity of the Park Authority's goal of achieving sustainability and nature recovery.

CPRW-B&R is aware of the increasing threat to the park objectives from development outside BBNP park boundaries. This includes ammonia emissions from intensive livestock farming, visual impacts of large scale renewable energy development and pressures from traffic routes through the park all of which will threaten ecosystems and public enjoyment of wild and tranquil rural spaces. We would like to see some discussion of the role of the Welsh Government and surrounding Local Planning Authorities in respecting the qualities and integrity of the park and the need to consult the Park Authority early in the process of relevant development planning.

We welcome the intention to improve the condition of protected water bodies but feel this should be extended to all water bodies within the Park. The Usk, as NPMP21 recognises, is in particularly poor condition among Welsh rivers, and featured in a recent Panorama programme for this reason. Part of the northern edge of the Park lies within the Wye catchment which is also a focus of concern. The Park is also home to the Brecon Beacons Mega Catchment, which supplies much of South Wales's drinking water. The condition of all these waterbodies is equally important.

The vital role of Britain's uplands is sometimes overlooked, in part because of their limited agricultural value. We welcome the intention to restore peatlands and hope the BBNPA will emphasise to policy makers the vital ecological and ecosystems services role of upland areas.

Opportunities for enjoying the Park & Inspiring people and places: Strategic policy

Areas for action identified are:

1. To have made public and sustainable travel a viable means of accessing the Park for our visitors
2. To promote the Park as a national health service
3. To develop a programme of interpretation, education and communication linked to nature recovery projects in the National Park
4. Develop an integrated plan for the future management of the Historic Environment working with objectives around nature recovery

We don't know to what extent the Welsh Government has acted on the recommendations of the 2018 report 'National Parks for all: Making car-free travel easier' and what funds have been made available to facilitate 1 above. We look forward to commenting further at the next stage of consultation but in the meantime are pleased to see the intention to make public transport more accessible to both communities within the Park and visitors.

Objective 2 will be to some extent met by attending to the other objectives within the plan. We assume that the intention here is to follow a model along the lines of that operated in the South Downs National Park, which is seeking to attract new audiences and provide outdoor activities for connecting with the landscape through arts, heritage and volunteering opportunities.

There must be potential to follow the lead of Snowdonia National Park and work with local NGOs and their volunteer networks to deliver some aspects of the Plan, and in doing so deliver some of the objectives above.

Living and working in the Park & Community and rural enterprise: future policy objectives

Objectives identified are:

- To develop a 'green growth' strategy for the National Park with Payments for Ecosystems Services at its heart
- To enable and support community development of Place Plans with the aim of developing 20 minute communities

The State of the Park Report and NPMP21 detail serious issues for Park residents including the failure to supply sufficient affordable homes, with barely a tenth of the required number built, and high rates of town centre vacancies. We had expected to find objectives here to tackle these problems.

Small rural towns were challenged even before Covid and have been seeing a flight of essential services such as banking and post offices. There is an urgent need for policies to regenerate rural towns and ensure that essential services are available to residents in their nearest commercial centre.

We can't see that either 'green growth' and Payments for Ecosystems Services or the potentially undeliverable objective of creating 20 minute places address the issues above. Nor do they offer much to residents of the less prosperous towns in the Park. The BBNPA has not only to carry out its two special purposes but also the legal duty to 'seek to foster the economic and social well-being of local communities'. We hope at the next iteration of the Plan to see policy aimed at addressing these issues.

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