



NATIONAL PARKS WALES
Britain's breathing spaces

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National Parks Wales' Response to the Inquiry into Sustainable Land Management

National Parks Wales is grateful for the opportunity to provide evidence to the Inquiry into sustainable land management in Wales. The three National Park Authorities (NPAs) in Wales work in partnership as National Parks Wales to collectively respond to policy issues which may potentially influence the management of Wales' National Parks. Colleagues from the Brecon Beacons; Pembrokeshire Coast and Snowdonia National Park Authorities have collaborated on this response. We are content to see this response to be made public and should be able to respond to further questions in person should the Committee believe that is required.

1. What do we want sustainable land management in Wales to look like and what outcomes do we want to deliver in the short, medium and longer term?

1.1. This is the key question. Whilst we are all familiar with the standard definitions of sustainability and sustainable development from Brundtland onward, there is no unanimity nor consensus in Wales as to how those definitions can be applied in such a way as to enable widespread, inclusive and consensual "buy in" across Welsh society and the Welsh political spectrum.

1.2. This can best be illustrated by our diverse attitudes to land itself. As National Park Authorities (NPAs), guided by our statutory purposes, we perceive that the remaining semi natural habitats in National Parks that form our most valued landscapes are of the utmost significance and importance.

1.3. We want to see A properly functioning mosaic of agricultural land, woodlands, moorlands and uplands contributing to the provision of ecosystem services and resilience to the impacts of climate change in the medium to long term. In the short term this requires us to plant native broadleaf woodland on marginal agricultural land at an increased rate, the felling of upland coniferous forests and the restoration of upland peat bogs as the very minimum. There will also be significant biodiversity



enhancement. In the short term, Wales is on course to fail to meet the EU's 2020 biodiversity target, which in short is to halt the loss of biodiversity.

- 1.4. National Park Authorities are guided by the National Parks statutory purposes and subsequent clarification and guidance such as the Sandford principle. Hence the values placed on them are primarily environmental and aesthetic. We then perceive opportunities for quiet enjoyment and understanding (guided by Sandford) to be a second strand of appreciation. Those two elements combine to create economic benefit for society which we then define as sustainable land management.
- 1.5. The perception of farming communities to this same land is very different. Landowners, whilst appreciating the environmental and aesthetic elements see the economic dimension as the main driver for the management of land. Historically, opportunities to reclaim semi natural habitats for increased agricultural production (with very significant state support) was regarded as economically and socially beneficial and an environmental price worth paying.
- 1.6. Whilst public policy has evolved, providing a framework for the protection of these areas, a fundamental 'mismatch' between the hopes and aspirations of landowners and their representatives and the plethora of governmental and non-governmental environmental organisations remains.
- 1.7. Reconciling that fundamental difference of opinion lies at the very heart of creating an environment of mutual respect and cooperation that will lead to sustainable land management. Current elements of farm-based environmental management should become second nature to farming, rather than reliant on cross-compliance and agri-environment incentives; management of the environment should become a public good as equally as important as food production.
- 1.8. This reconciliation process will determine the shape and structure of future sustainable land management in Wales. In practical terms sustainable land management will contribute to a properly functioning mosaic of agricultural land, woodlands, moorlands and uplands contributing to the provision of ecosystem services and resilience to the impacts of climate change in the medium to long term.

2. What are the barriers preventing us from delivering these outcomes now and how do we overcome these challenges?

- 2.1. We are where we are. A significant proportion of land within the Welsh National Parks is intensively managed. The land is highly agriculturally productive, but offers comparatively little in terms of nature conservation. Yet it is perceived by landowners and the general public as being well managed and cared for, highlighting differing perceptions of land management. In the Pembrokeshire Coast National Park for example, it is calculated that some 49% of the total land area comprises intensively managed grassland together with approximately 11% arable land. We calculate that about a third is semi natural habitat.



2.2. Most of the agricultural land in the Welsh National Parks has been significantly modified. Whilst continuing to offer opportunities for public enjoyment and appreciation, the nature conservation value of the landscape has been lost over large areas. Programmes of restoration management for public/ecosystem goods production, tied as and where necessary to the production of market goods, will be necessary.

2.3. In order to overcome these barriers there has to be universal acceptance that the policy outcomes related to ecosystem services and climate change cannot be achieved without significantly modifying the current system in which we operate. There has to be collective action, perhaps utilising the primary law making powers of the Assembly, some suggestions include;

- o The production of a long term vision and a national biodiversity recovery plan, with the right legislative, policy, information and skill tools in place to deliver on objectives.
- o Raising the priority of biodiversity conservation within local government as a whole;
- o Reasserting the duty under Section 62 of the Environment Act 1995 for all public bodies and statutory undertakers to have due regard to the purposes of National Parks and AONBs - amending this duty from "having regard to", to "actively supporting the purposes of National Parks and AONBs";
- o Developing a bigger 'biodiversity workforce' in the private as well as the public sector;
- o Developing a growth model for Wales that is based primarily on wellbeing, environmental, public health and education outcomes rather than GDP.

3. What are the main policy drivers and how can these be shaped to overcome these challenges?

3.1. The market will be the main determinant for the agriculturally productive land. Creating a vibrant, competitive and flexible agricultural economy, based on sustainable land management, that values and contributes to wellbeing, ecosystem and climate change-related outcomes will be key to a successful future for this element of our land resource.

3.2. For the remaining semi natural habitats, substantial public investment through agri-environment schemes is required to ensure their continued management. Common land for example is a very large and valuable environmental resource. Currently many commons are threatened by abandonment and non-management. The Glastir Commons element illustrates what can be achieved through a positive and dynamic intervention.

3.3. It should also be noted that there are economic opportunities from marketing products good and recreational services from these iconic landscapes.

The Committee would also welcome views on these questions too:



4. How we define the key ecosystems and ecosystem services in a way that makes sense for Wales?

- 4.1. The *Living Wales* programme sets out an approach to management and regulation of Wales' landmass and seas in accordance with the principles for ecosystem health and productivity set out in the Convention on Biological Diversity. We welcome this pan-Wales approach. As authorities responsible for 20% of Wales' landscape by area (an additional 5% managed by the AONB partnerships), we note that the purposes of protected landscapes are entirely consistent with the emerging principles of the ecosystem approach to management and the *Living Wales* programme.
- 4.2. However, in Wales, and across UK protected landscapes, the emphasis is less on managing pristine ecosystems and more on managing human impacts on what are often heavily-modified environments. While natural beauty, heritage, access and recreation (of particular importance in protected landscapes) are recognised by the ecosystem approach, we suggest that there would need to be an enhanced application of the approach in UK protected landscape management, in order to reflect the strong, interacting, cultural and social dimensions of the designations and the exceptional nature of these landscapes: in other words a whole-landscape approach (to include all the ecosystem principles) within protected landscapes.
- 4.3. But if this is true in protected landscapes, there is no reason why it cannot be true across Wales as a whole. The landscape is the ultimate provider of the most important things in life: opportunities to enjoy the rest of nature, get fit and healthy, enjoy great food, find satisfying employment, benefit from clean and secure energy sources, become self-reliant and help build friendly, resilient communities.
- 4.4. This suggests that sustainable natural resource management can, in and of itself, can contribute to key economic and social outcomes, and help bring about cultural and behavioural change. The economy might therefore be viewed as a set of ecological transactions taking place within a global environment. It is up to us as a nation, in the way the economy and monetary system is structured, to determine whether these transactions are environmentally benign and socially equitable, or otherwise.
- 4.5. The *Living Wales* programme proposes adoption of natural resource management plans at national and local levels. We envisage an integrated and complementary 'net' of plans, fit for purpose and pitched at an appropriate geographical scale to cover and coordinate the necessary aspects of management human activity and their impacts on the environment.
- 4.6. This suite of plans would, perhaps, include catchment management plans, habitat/species action plans (including action for migratory species), woodland strategy, a national heritage plan, invasive non-native species strategy, health and wellbeing strategy, to give just a few examples. Collectively these should point the way for economic strategy based on a non-destructive use of Wales' assets.



5. How we develop a baseline from which to measure progress? This includes how we collect, coordinate and use data to support sustainable land management in Wales. What incentives we can provide land managers to develop sustainable practices, and in particular, any new sources of investment we can attract to support these?

5.1. Wales is the only country in Europe to have comprehensive coverage provided by local records centres, through Local Records Centres Wales). We need to make use of them more and provide greater support. Help them to become the repositories of national biodiversity datasets and the arbiters and standard bearers for field survey techniques and field crafts.

5.2. Partners need to monitor change in Wales in order to know whether policies are working and whether, taken together, they are sufficient to achieve ecosystem and human welfare outcomes. We identify three levels of information.

Level	Purpose	Comment
Outcome information	To assess progress on outcomes.	This is the most important type of monitoring as it tracks the overall result of various influences on Wales. However, outcomes may change only slowly and may not, on their own, tell us why things are changing.
Factor information	To identify existing and future causes of change.	Often helps identify existing and future causes of change in a more timely way than outcome data. The issues and opportunities associated with impacts on the state of the Wales should give rise to policies.
Impact information	To assess effectiveness and efficiency of organisational performance.	Coupled with the reasons for management (provided by 1 and 2 above), this completes the basic audit trail. Performance information (e.g. impact-to-cost ratios) will often be collected by individual organisations, for example in relation to their Corporate or Business Plan.

5.3. If all the factors affecting achievement of the outcomes have been identified, and management addresses these factors, there can be a degree of confidence that partners' combined efforts are contributing towards the desired outcomes. Whether that effort is actually enough to achieve the outcome may only become apparent over time, since Wales is a dynamic place and may be influenced by factors that are beyond partners' direct control, and/or which originate beyond its borders.



5.4. The result is that 'success' is not always a fixed quantity, and will often, in addition, depend on how people feel or what they perceive. For example, people's expectations of recreational opportunities or the state of the environment will change, as well as recreational provision or the "objective" state of nature itself. For this reason, we suggest avoiding using fixed outcome targets to try and define a desired state of Wales. Instead, outcome and factor measures are used to assess the direction and rate of travel towards headline goals, and thereby determine appropriate and adaptive policies and action.

6. How we ensure that our sustainable land management policies maintain vibrant rural communities and attract new entrants into the land-based sector?

6.1. Meaningful, genuine and locally based engagement with land managers is key to this element. The principles of localism and adaptive management should lie at the heart of sustainable land management policies. Conversely, broad-brush, inflexible support measures based on the "one size fits all" principle will inevitably contribute little to the vibrancy of the Welsh countryside and could very well actively undermine it.

7. The most appropriate geographical scale(s) at which we should be delivering sustainable land management policies and practices in Wales?

7.1. There are several scales at which sustainable land management can be delivered. Produce, product and service marketing can be delivered at local, regional and national levels, each tier being complementary and mutually supportive.

7.2. Conservation land management of remaining semi natural habitats should be at a landscape scale. Much work has been done to identify coherent landscapes throughout Wales including historic landscape characterisation assessments and habitat identification and prioritization.

7.3. Ultimately, sustainable land management always relies on persuasion, co-operation and partnership. Therefore scale will include the scale at which partnerships can operate most effectively. The agriculturally productive land will be largely self defining and based on sectoral and commodity factors.

8. If there are key actions we can take to deliver short-term 'quick wins' and the actions we should be taking for the long-term?

8.1. Introduce measures now that will ensure that Wales doesn't fail by too much to meet the 2020 biodiversity conservation target. Following the failures in 2010 to halt the loss of biodiversity, Wales still requires a national plan and a set of clear objectives to know what it must achieve. Without this, Wales still doesn't know what it's losing, or gaining.

8.2. Related to this we need to recognise and correct the deficiencies of the current Glastir agri-environment scheme to bring it into line with the principles of adaptive management referred to above.



Thank you again for the opportunity to contribute to the Inquiry. If you require any further information or clarification please do not hesitate to contact me in the first instance.

Yours sincerely,

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Parciau Cenedlaethol Bannau Brycheiniog, Arfordir Penfro ac Eryri yn gweithio mewn partneriaeth Brecon Beacons, Pembrokeshire Coast, and Snowdonia National Parks. Working in Partnership.

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