

National Assembly for Wales
Environment and Sustainability Committee
WFG 44
Well-being of Future Generations (Wales) Bill
Response from National Park Wales

WELL-BEING OF FUTURE GENERATIONS (WALES) BILL 2014 inquiry
Response from National Parks Wales

National Parks Wales (NPW) represents the 3 National Park Authorities (NPAs) in Wales. NPW welcomes the Wellbeing of Future Generations Bill, believes NPAs in Wales have long made a contribution to the sustainability of Wales and are primed to make a lasting contribution to the Well-being of Future Generations agenda. NPW would welcome the opportunity to provide oral evidence to the enquiry.

NPW responses are given in italics against the points in the inquiry document (underlined):

1. How the Welsh Government should legislate to put sustainability and sustainable development at the heart of government and the wider public sector;

Existing legislation has put sustainability is at the heart of National Park Authorities' policy and delivery, through the National Park Management Plans (NPMPs) and other strategies and their implementation.

For example, in the Brecon Beacons NPMP Sustainability is a guiding principle: "Sustainability is essential in order to provide future generations with a national park that can, at the very least, be enjoyed and utilised as it is today." "Broad scale issues such as climate change require international action but can be addressed within the Park via landscape-scale actions" "The NPMP is subject to appraisal in order to assess potential social, economic and environmental impacts of the proposed aims, goals, policies and actions".

Similarly in Snowdonia NP: Sustainability and sustainable development are at the core of Snowdonia National Park's policy framework and operational activities. All relevant documentation strives to deliver sustainable development within the National Park context, including; the National Park Management Plan and Local Development Plan. The NPMP's Vision places sustainability and wellbeing at the core of Snowdonia. The LDP's core Development Strategy places sustainable development at the heart of landuse planning in the National Park. Given that Wales' National Parks are regarded as test-beds for sustainable development, this level of commitment and delivery is recognised as being at the forefront of sustainable development in Wales. In addition to both statutory plans, the Authority's suite of supplementary policy documents – linked either to the NPMP or LDP, demonstrate a similar commitment to sustainable development, including: the National Park Recreation Strategy, Sustainable Development Supplementary Planning Guidance, the Renewable Energy and Low Carbon Supplementary Planning Guidance. All relevant documents have also undergone stringent sustainability appraisals as dictated by National guidance and legislations.

In addition the NPA / NPMP role in wellbeing extends beyond the NP boundary eg. watercatchment management, carbon sequestration, recreational health & wellbeing resource, economic generator for Wales across a number of unitary authority areas, particularly in the case of Brecon Beacons National Park with impacts on the tourism economies of the South Wales Valleys Authorities as well as those of Powys, Monmouthshire and Carmarthenshire. Examples of the wider impact of NPs:

- *Economic activity that is concerned with the protection or management of the environment, or dependent in some way on the environment supports 10,738 jobs directly within the National Park boundary and a further 2,033 jobs across Wales, generating 0.7% of Wales total GDP.*
- *In a survey 73% of Wales residents had visited a National Park in the previous year. National Parks have been described as ‘Wellbeing Factories’, providing access to open space, for activities beneficial to health and wellbeing*
- *Other ecosystem services provided by the National Parks include: clean water, water storage in the uplands to reduce lowland flooding, carbon storage, and clean air. The value of carbon sequestered through peat and woodland within the National Parks is estimated to be between £24.4m and £97.2m.*
(Valuing Wales’ National Parks ARUP 2013)
- *Brecon Beacons NP supplies drinking water to 750,000 people in South Wales*
- *Jobs linked to Snowdonia National Park’s environment are in excess of 4,450 with an associated turn-over of almost £675,000 per annum.*
- *Snowdonia National Park attracts over 5.5 million tourists every year*

In delivering NPMP actions the 3 NPAs continue to deliver ground breaking projects demonstrating sustainable development delivery. For example in SNPA: targeted improvements to the recreation infrastructure aimed at protecting the National Park’s special qualities whilst encouraging access, providing land managers with information on how to manage their land assets sympathetic to catchment-wide requirements and carbon sequestration, continually add-value to partnership working to improve upland peatlands (for carbon storage, water management and biodiversity) and foster a profitable relationships between the National Parks’ special qualities and the private sector, mainly in the local produce and tourism sectors. Snowdonia is among Wales’ most recognised brands and is Britain’s most widely recognised National Park.

2. The general principles of the Well-being of Future Generations (Wales) Bill and the need for legislation in the following areas –

- The “common aim” and “sustainable development principle” established in the Bill and the “public bodies” specified;

With regards to the ‘common aim’ & ‘SD principle’ – together they set a complimentary framework to deliver well-being goals at both a national & local level. The Bill may need to be more specific about what happens if there is an irreconcilable conflict between the ‘common aim’ (delivering short-term results) vs. the ‘sd principle’ (delivering long term goals). In this respect, the legislation governing NPA’s may offer a way of balancing potentially conflicting outcomes/goals (i.e. the ‘Sandford principle’...section 62 of the Environment Act (Wales) 1995).

- The approach to improving well-being, including setting of well-being goals, establishment of objectives by public bodies and the duties imposed on public bodies;

Wellbeing goals are welcomed. Locally driven & locally meaningful approaches for their delivery are important, to deliver appropriately to local needs and help maintain local distinctiveness.

It is essential that reporting requirements do not become more onerous and must not be additional to reporting requirements under, for example, Local Government measure requirements. Integrated reporting

(bringing together the range of duties reported on in one place), if adopted as the sole reporting process rather than an additional reporting strand, will deliver meaningful information, bringing together strands of activity without imposing an undue additional reporting burden. This has been discussed in the WFG Bill Reference group by WAO as a potentially beneficial approach. Programme and population accountability are both relevant- showing the impact of areas of activity.

Creating a clearer set of indicators as a means of improving performance should be seen as a positive step forward for Wales. It also offers an opportunity to keep the public sector (and key partners) focussed on key national & local priorities – but only if the suite of indicators isn't too unwieldy and cumbersome. Welsh Government may need to establish a clear set of 'core' statutory indicators that all public bodies have to deliver against.

In light of the above comment, the 'Scotland Performs' model seems to offer a good example of utilising clearly defined indicators to improve both national and local performance against agreed long-term outcomes (<http://www.scotland.gov.uk/About/Performance/scotPerforms>).

- The approach to measuring progress towards achieving well-being goals and reporting on progress;

*It is important that the measurement of well-being is achieved through a recognisable set of indicators adopted not just in Wales but ideally across the UK to support benchmarking:
(<http://wales.gov.uk/statistics-and-research/sustainable-development-indicators/?lang=en>)*

There is some concern amongst NPA's in Wales that the duties imposed on public bodies should be appropriate to the scale of the organisations listed in the Bill (i.e. a 'one size fits all approach' won't work and could prove overly bureaucratic for smaller public bodies such as NPA's)

In this respect further clarification is needed regarding the interplay and potential overlap of the duties placed on public bodies through the WFGB Bill and the existing Local Government Wales Measure. In particular, there is a danger that the annual dimension of Improvement Plan reporting (developed under the Local Government Measure) could be at odds with the long-term approach being advocated by the WFGB. Ultimately, the WFGB offers an opportunity for WG & WAO to streamline the existing audit approach with all outcomes & performance being judged against the 'Annual Well-Being Report'. We would favour the Bill being amended to include an requirement on WAO to publish annual guidance on how they will audit the requirements of the Bill and its relationship with other audit requirements such as LGM.

Further possible conflict with LG Measure is the requirement to publish well-being objectives which contribute to the statutory well-being goals. Are the well-being objectives in addition to the improvement objectives required under the LG Measure?

National Park Management Plans bring together on an area basis actions by a range of partners- many in support of WFG Goals. For example, The BBNP National Park Management Plan Action Plan 2010-15 lists outcomes and associated priority actions to achieve these. Many (not all) are BBNPA led or facilitated. This applies equally to all three National Park Management Plans. Integrated reporting, including NPMP action plan delivery reporting has the potential to measure progress on wellbeing goals. The NPMP's delivery on the WFG Goals is illustrated in the following table (Similar delivery across the range of goals is achieved through the PCNP NPMP actions):

<i>Wellbeing Goal</i>	<i>Example BBNPA & SNPA Actions</i>
A prosperous Wales BBNPA	<ul style="list-style-type: none"> • Implement activity tourism strategies within environmental sensitivity. • Develop locality & themed business clusters under COLLABOR8 • Maintain and develop business training programmes. • Apply for revalidation of European Geopark status.
SNPA	<ul style="list-style-type: none"> • Regeneration and economic development initiatives relevant to NP designation: SNPA has either led or been a leading partner in initiatives relating to landscape scale improvements, improving the local and regional recreation infrastructure, adding value to the Snowdonia brand and assisting businesses in linking their activity to the NP designation • Assisting in the provision of employment and skills improvement initiatives based on land management industries, renewable energy programmes, leisure and recreation and culture and heritage sectors. • Leading & supporting significant EU and Lottery bids
A resilient Wales BBNPA	<ul style="list-style-type: none"> • Secure funds, implement 1 large, area-based land management project. • Manage NPA-owned land. • Attract new investment for managing the Park's landscape to mitigate and adapt to the effects of climate change. • Encourage and support community-led initiatives that build awareness of and resilience to climate change, fossil fuel depletion and carbon
SNPA	<ul style="list-style-type: none"> • SNPA strives to ensure economic prosperity has a resilient base • All relevant policy documents demonstrate a commitment to reducing our reliance on fossil fuels and reducing fuel poverty
A healthier Wales BBNPA	<ul style="list-style-type: none"> • Increase the use of the NP by excluded groups. • Increase awareness of and provision for people with disabilities and easier access requirements in the countryside. • Provide targeted countryside access information in a wider variety of accessible formats.
SNPA	<ul style="list-style-type: none"> • Work to ensure equitable access to SNP's wealth & range of recreation opportunities - addressing cultural, social, economic and physical barriers-in partnership with local partners (most notably the North Wales Outdoor Partnership) and other Welsh NPs (Mosaic Project)
A more equal Wales BBNPA	<ul style="list-style-type: none"> • Deliver community based outreach programmes such as Crossing Park Boundaries that increase the value of and benefit from the NP designation. • Continue to develop and deliver the Social Inclusion action Plan
SNPA	<ul style="list-style-type: none"> • Developing opportunities as in "a healthier Wales " above
A Wales of cohesive communities BBNPA	<ul style="list-style-type: none"> • Deliver a Sustainable Development Fund which meets the strategic priorities of the National Park Management Plan • Support allotments development • Link public transport to BBNPA promoted routes. • Recent BBNPA agreement to develop plans for BBNP as a Dementia Friendly NP
SNPA	<ul style="list-style-type: none"> • SNPA continues to work with LA's to promote sustainable travel solutions to Mt. Snowdon, for example a Park-and-ride service from the surrounding villages
A Wales of vibrant culture and thriving Welsh language BBNPA	<ul style="list-style-type: none"> • Provide local people with access to information, interpretation and education on their environment and promote the benefits on offer • Provide information, orientation and interpretation at identified gateways and honeypot sites. • Produce a suite of guidance for built heritage. • Develop a regional strategy to protect, manage and monitor the Park's historic environment.
SNPA	<ul style="list-style-type: none"> • SNPA recently purchased the home of wartime poet, Hedd Wyn - posthumously presented with the Eisteddfod's bardic Chair in 1917, following his death. This hill farm is almost unchanged since his day. SNPA have successfully accessed substantial Lottery funding to develop Yr Ysgwrn into a heritage centre.

- The establishment of a Future Generations Commissioner for Wales, the Commissioner's role, powers, responsibility, governance and accountability; and

We believe a FG Commissioner can play an important role in supporting public bodies , enabling sharing of best practice and monitoring the profile of the Future Generations Bill, as well as holding Welsh Government to account for delivery of Wellbeing Goals. The appointment of a Commssioner will provide a focus and ambassador for related work.

- The establishment of statutory Public Services Boards, assessments of local Well-being and development / implementation of local well-being plans.

There is a need to clarify the relationship between statutory National Park Management Plans and Public Service Board Wellbeing Plans and the NPA role in Public Service Boards)/integrated community planning. NPMPs are local wellbeing plans and should be included as such in the Bill. For example, In the case of BBNPA the NPA is not represented on any of the constituent LSBs. BBNPA was formerly a member of Powys LSB. This was slimmed down, resulting in lack of NPA representation. Current arrangements do not enable BBNPA WFG Bill involvement through LSB/PSB framework. Similarly in Pembrokeshire PCNPA is not represented. NPAs have a responsibility under the Bill but no opportunity to influence the Well-being plan.

PSB's will need to be representative of all key areas of well-being development- Including National Parks and NPAs . In particular, NPAs have a role in the well-being of their areas and (as the planning authorities for their area) should be represented on the relevant PSB's. The WFGB should make provision for NPAs to be members of PSBs.

SNPA is represented on all relevant LSBs, however they we are not part of the Regional Ambition Board for the North Wales – a key omission given the National Park's importance to the regional economy. In developing any regional plan, National Park Authorities must be included as key partners and delivery organisation, to this end, appropriate consultation should be undertaken with NPAs NPMP, LDPs and other relevant document – for example Recreation & Access Strategies.

- 3. How effectively the Bill addresses Welsh international obligations in relation to sustainable development;

The inclusion of NPA's in the WFGB process will ensure that Wales continues to contribute to shared goals across the global community of protected areas through both the IUCN Global Protected Areas programme and the European Landscape Convention.

- 4. Any potential barriers to the implementation of these provisions and whether the Bill takes account of them;

Any loss of dedicated resources for delivery of a more sustainable future is a potential barrier to implementation. The Bill potentially gives the opportunity for linking together disparate sources of funding to create larger landscape management for ecosystems delivering a wider range of interconnected benefits. A range of differently scaled interventions are needed to enable sustainability and future wellbeing:

eg Resources for large scale landscape management for ecosystems services to benefit future generations: water resources, flood management , climate change mitigation, access for health and wellbeing benefits

eg.in NPAs the Sustainable Development Fund (SDF) is an important lever for delivering local sustainability- enabling locally led action, leveraging in funding and acting as a seedcorn for bigger sustainability delivery.External evaluation confirms value of NPA development officers in enabling locally led sustainability.

The Scrutiny review of Inspiration and benefit from BBNP revealed local people receive a wide range of benefits from the National Park and BBNPA activity, including frequently cited wellbeing benefits, and Scrutiny Review provides one potential model for monitoring delivery:

“I know my well-being benefits hugely from being able to simply look and take in the wonderful vistas”

“Enjoyed. Gave me something to wake up for and look forward to’ (BBNPA Rural Skills participant)

5. Whether there are any unintended consequences arising from the Bill;

6. The financial implications of the Bill (as set out in Part 2 of the Explanatory Memorandum and Regulatory Impact Assessment; which estimates the costs and benefits of implementation of the Bill); and

Costs to the NPAs are unknown as additional requirements (beyond monitoring & reporting) are unknown. Our major concern is the potential for an additional burden of reporting with a staff resource cost. Evidencing and reporting of the provisions of the bill need to be appropriate to the scale of the organisation. The annual dimension of NPA’s Improvement Plans, developed under the Local Government Measure, is at odds with the long-term approach being advocated by the WFGB. The worse-case scenario is that NPAs need to continue to meet the LG Measure and also have a new reporting regime as a result of the WFGB. WG and WAO need to develop one audit approach that covers all our requirements.

As 2. above, integrated reporting for each NPA (bringing together existing reporting requirements eg Equality, Welsh language, BIP etc) in a single report in addition to making a for a meaningful report on a range of Future Generations goals, has the potential to reduce the overall resource commitment to reporting, freeing up more staff time for delivery.

7. the appropriateness of the powers in the Bill for Welsh Ministers to make subordinate legislation (as set out in Chapter 5 of Part 1 of the Explanatory Memorandum, which contains a table summarising the powers for Welsh Ministers to make subordinate