



**Cyfoeth
Naturiol
Cymru
Natural
Resources
Wales**

Julian Atkins
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Dyddiad/ Date: 10 July 2014

Dear Julian

RE: DRAFT BRECON BEACONS VISITOR MANAGEMENT PLAN

Thank you for consulting Cyfoeth Naturiol Cymru / Natural Resources Wales regarding the above, which was received on 2 June 2014.

Natural Resources Wales brings together the work of the Countryside Council for Wales, Environment Agency Wales and Forestry Commission Wales, as well as some functions of Welsh Government. Our purpose is to ensure that the natural resources of Wales are sustainably maintained, used and enhanced, now and in the future.

Natural Resources Wales (NRW) are supportive of the production of the Brecon Beacons Visitor Management Plan and have been involved from the initial workshop stage, for which we thank BBNPA. We look forward to continuing to work in partnership to assist the BBNPA in achieving the aims outlined within the document and summarised in the action plan. We submitted a response to the initial draft on the 20th September 2013. We do not believe that some of the points raised by NRW in this response have been fully addressed and are therefore repeated in the current response.

NRW have split our response into general points (below) and specific points related to page or subsection in the attached annex.

General points

1. NRW welcome the evidence based approach which underpins this report and the recommendation to develop and deliver a site-based approach. A significant report to add further evidence to this area of work has been produced since this final draft: *Valuing the Welsh National Parks (LUC 2013) commissioned by NRW and National Parks Wales*. Reference to this could add further weight to the findings of the Visitor Management Plan.

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2. We also welcome the intention to use this report to amend the State of the National Park report which in turn informs the review of the National Park Management Plan. The suggested indicators which support the Special Qualities are also useful.
3. There is significant emphasis on stakeholder engagement to develop sustainable solutions to the many challenges facing the BBNP and this is certainly in line with the Ecosystem Approach which is being promoted by Welsh Government. Further to this it may be helpful to develop readily understandable 'values' for areas of significant ecosystem services eg damaged peatlands and downstream water quality and quantity. Where ecosystem services are impaired by excessive recreation, having these values will help stakeholders to contribute to more informed decisions. We would refer you to our earlier response relating to the Ecosystems Approach.
4. Some of the more significantly environmentally pressured sites are also protected sites (Sites of Special Scientific Interest (SSSI), Special Areas of Conservation (SAC) or both SSSI & SAC), a matter that is also proposed to be used as an indicator for Action A.2. These sites represent areas that are amongst the best examples of habitats, species, geology and geomorphology in the UK. The conservation and enhancement of these sites is also a duty on the BBNPA. NRW advise that the issues resulting from footfall and other forms of direct and indirect visitor use on protected sites should be a high priority and reflected in the resulting visitor management actions on protected sites. In addition to direct impacts, on some sites indirect visitor effects on management practice such as grazing may have a significant effect on the practicalities of management to achieve other objectives. In these circumstances a wider/ecosystems approach may be required to optimise public benefits.
5. NRW feel that the two reviews commissioned by Countryside Council for Wales on habitat vulnerability and mapping could be used more widely in this plan. The mapping within these reports could also be used to illustrate more clearly the vulnerable nature of much of the BBNP, and so help emphasize other sections (e.g. 2.33-2.35). If required, NRW are happy to work with the BBNPA and their contractors to provide mapping and adjust the relevant sections.
6. With the designation of the International Dark Skies Reserve it would be beneficial to include a full assessment of the potential for maximising the benefits to the tourism sector and indicators to retain the status.

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7. Alongside the stated intention to improve evidence and increase knowledge about current visitors through a large scale survey and collection of data as outlined in sections 3.76 and 3.77in, it would be helpful to consider future predictable trends such as the ageing UK population, to help inform plans and priorities.
8. Under section 3.72, Access for all, we note the intention to continue to address barriers to accessibility and in particular, the importance of information provision. In this context, it might be helpful to include reference to the principles of least restrictive access (LRA) as set out in the CCW document '*By all reasonable means: inclusive access to the outdoors*'. We think that this is particularly relevant because LRA principles address accessibility in its widest sense and complement the management zoning approach.
9. It would be worth further consideration of health & well being within the plan. We would encourage the use of our Wales Outdoor Recreation Survey Profiles for health. This will provide data on who is doing what and what they want to do more of, as well as the barriers. NRW will shortly have available a Health Impact Assessment Tool. This is an "emerging tool" that can be used to identify potential and actual impacts on health and wellbeing that activities/projects/places could have. It is specifically designed with outdoor recreation/health projects in mind.
10. This document will ultimately be the basis of a significant strategy to help solve some the BBNPA's more significant challenges and it will be shared with a wide audience. As images are a powerful tool, NRW feel that additional care is required with the images used in the publication. We support the use of photographs which strongly illustrate the significant challenges outlined in the document but would advise that care needs to be taken to ensure that such images are appropriate. As noted in our previous response, we are able to offer images of some of the areas of most significant concern such as the Waterfalls Area and Waun Fach for use in this plan.
11. In relation to National Park Events policy, NRW is happy to work with BBNPA on events (many events use both of our land), however it is also important that in the events policy event holders contact NRW if using NRW land is being used, there have been recent events using NRW land without contacting us.
12. NRW are currently developing an Access and Recreation Strategy that will steer the work being taken forward by the organisation in the coming years. Guided by a set of core principles, part of the work being

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undertaken will include a review of the landholdings currently owned or managed by NRW to identify appropriate areas for recreational development. NRW would welcome the opportunity to work with BBNPA on this spatial planning program.

To summarise, whilst we desire some minor amendments to the plan, NRW warmly welcome the production of the Brecon Beacons Visitor Management Plan and look forward to working in partnership to assist the BBNPA in achieving the aims outlined within the document.

As always, if you require any further information or clarification of the above, please do not hesitate to contact us via Jonathan Saville, using the contact details below

Yours sincerely



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Annex

DRAFT BRECON BEACONS VISITOR MANAGEMENT PLAN DETAILED COMMENTS FROM NATURAL RESOURCES WALES

Page iii The Executive Summary states (out of context) “*There are opportunities for closer working with the police to prevent undesirable activities such as off-road vehicle use*”. Whilst this statement clearly refers to section 3.42 and Action B.3, there is a need to clarify that this is only undesirable to the extent of being a Police matter when illegal.

Page iii The Executive Summary also states “*Agreement should be reached on the types of recreation that can take place on open access land before special licences are required of recreation providers*”. Whilst this statement clearly refers to section 3.45 and Action B.5, NRW can offer the BBNPA significant assistance to help resolve these matters.

Page 2 (1.8-1.14) To give extra context, this section should outline it relates to the Sustainable Tourism Strategy 2012-16. The delivery plan for the STS refers to developing a visitor management plan so this must be the link.

Page 16 – This section is titled - “Vulnerability of biodiversity to disturbance” - “Biodiversity” is not the most appropriate term to use here, impacts from recreation are specifically on habitats and species and these terms should be used, unless this *section* is *referring* to species impacts alone. Perhaps the text could say “Vulnerability of habitats and species to the impact of recreation”?

Page 16 2.40 - You state the research commissioned by Countryside Council for Wales mapped the “...theoretical vulnerability of biodiversity (in the form of selected species)...” This work also looked at a complex of habitats, soils, species and other physical parameters not just species. CCW used data from a variety of sources to map the theoretical vulnerability of different habitats and species to a range of impacts, one of which is disturbance by people (including, but not exclusively, recreational activities).

Page 16 2.41 - The other findings of the Habitat Vulnerability Mapping work that should be acknowledged in this report include the highlighting of much of the upland area of the BBNP (and other locations) as being in the highest categories of overall vulnerability for the complex of receptors (including, but not restricted to, species vulnerability). These findings support the observations made in other parts of the draft MP (the “Spatial distribution of impacts” (2.63-2.69) section for instance) and it should also highlight this rather than just referring to the species elements,

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Page 16 2.42 - NRW are happy to discuss the conclusion of this research and its applicability to the BBNP with the BBNPA.

PAGE 11 2.23 (and subsequently 3.78 and action C.11) – NRW are happy to offer advice to the BBNPA on our experiences with using people counters on land we manage and share the data that we have collected from these counters.

Page 22 (2.58-2.62) – The BBNPA need to be very careful about highlighting the difference between scientific evidence and stakeholders views and the limitations of using views rather than evidence. This doesn't mean to say that stakeholder views do not have a role to play, they definitely do.

Figures 2.11 – 2.13 In response to our previous comments, thank you for removing figure 2.12 but there is now a need to renumber the other figures accordingly as currently they now go from figure 2.11 straight to figure 2.13.

Page 22 - NRW note your examples of honey pot locations in Figure 2.16 and that the definitions for these sites in **2.63** would indicate that the levels of use of honey pot sites are generally being well managed. However, some of these locations need on-going and sometimes improved forms of management to avoid them coming under your definition of “environmentally pressured sites” and this should be acknowledged. The example in 2.65 of the Waterfall Country and the on-going forum & work has been producing excellent results in visitor management, but pressures and risks to the Special Area of Conservation (SAC) remain which will require further resource.

Pages 29 and 30 - Actions A.1 A.2 – Whilst we strongly support the approaches outlined in these actions, NRW suggest strengthen the role of developing the evidence base in delivering these actions.

Page 33 - Action A.10 – NRW recommend that a car parking plan shouldn't be produced in isolation, there is a need to ensure it is part of the wider transport considerations.

Pages 35-39 and “B” actions – NRW recommend that the BBNPA consider the use of technology to provide a 'visitor experience' and as a tool to raise awareness of the fragility of such environments to people who may wish to experience wilder areas but who cannot for whatever reason.

Page 43 - Action C.10 – NRW strongly support the commissioning of a new large scale survey of day visitors and feel it may also be relevant to extend this to those on organised events.

Appendix 1 - Whilst we support the collection and analysis of evidence that is inherent in these proposed indicators, NRW wish to express caution that such an

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onerous set of data collection tasks the could become an inflexible end in itself and has the potential to preclude other suggested indicators.

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