

## Consultation Response Form

What do you think?

### **Question 1: What are your views on the proposal to reduce the membership of the Brecon Beacons National Park Authority from 24 to 18?**

Before any reduction is considered it would be necessary to amend the various Acts, including the Environment Act, in order to allow for greater local democracy to support the people living in the Park.

The Council could only agree to a reduction as long as there continued to be representation for all authorities. In addition any reduction should take account of the fact that 80% of the Park area is within Powys. However the Council only has 33% of the membership of the BBNPA. The Council would suggest that any reduction in representatives should come from Welsh Government's representatives not from local authorities.

At present PCC is obliged to show political balance when appointing to the Brecon Beacons National Park Authority (BBNPA). This has resulted in present and previous appointments being made with members from outside the Park area, mainly from Montgomeryshire being appointed to the Park to meet this requirement. Due to the low number representation from other authorities there is no such issue for them. The Environment Act suggests that members should come from wards wholly or partially within the Park. If the political balance is maintained and Powys numbers were decreased it would mean a further reduction in local members within the Park being appointed to the BBNPA. This can only be addressed by only allowing members with wards wholly or partially within the Park becoming authority members. This approach will support the need for National Parks to have more focus on social and economic development. This would also reduce the member travel costs.

In response to the "Protocol on the Selection of County Councillors as Members of National Park Authorities" which Welsh Government sent to County Councils for comment the Council commented as follows:

"With regard to the draft protocol itself, the only comment we would wish to make is that to achieve the aims set out (i.e. ensuring stability in membership, giving priority to those members with wards within a National Park area) the only way to achieve this is to remove National Park Authorities from the definition in Schedule 1 paragraph 2(1)(ba) of bodies to which requirements of Sections 15 and 16 of the Local Government and Housing Act 1989, so that the political balance requirements no longer apply".

BBNPA is unique compared with the other two Welsh National Parks in having a much greater number of local authorities within its boundaries. We must also consider that 80% of the BBNPA lies within Powys together, with the majority of its residents, including the towns of Brecon, Crickhowell, Talgarth, Sennybridge and Hay on Wye. Any number reduction would need to reflect this and as such no reduction in the 8 members from Powys should be considered.

**Question 2: What are your views on the proposed distribution of members of the Brecon Beacons National Park Authority between the seven principal authorities and the Welsh Ministers as set out in Table 3?**

As previously mentioned the BBNPA is unique in the large number of authorities involved. We do not support a reduction in the Powys numbers due to 80% of the Park being within Powys. This would give Powys a disadvantage and would not compare favourably with the numbers representing the Pembroke and Snowdonia single authorities. The consultation mentions the BBNPA's use of Member Champions and ambassadors. However, experience has shown that they have little or no impact on the residents of the Park, with a lack of understanding of the social and economic needs of the Park communities. If any reduction is to be made it should come from the Welsh Minister's appointments. These members have no mandate from the residents of the Park and have little contact or understanding of residents' needs. Some live outside the National Park area and some live in England.

**Question 3: We would like to know your views on the effects that reducing the membership of the Brecon Beacons National Park Authority would have on the Welsh language, specifically on:**

**i) opportunities for people to use Welsh and**

**ii) on treating the Welsh language no less favourably than English.**

**What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?**

Any reduction in numbers could cause a reduction in Welsh-speaking members and a desire to use Welsh within the authority.

**Question 4: Please also explain how you believe the proposed actions could be formulated or changed so as to have:**

**i) positive effects or increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language, and**

**ii) no adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language.**

As per question 3, it is largely about the commitment and desire of the senior management and members of the authority that the Welsh language is adequately supported.

We would oppose any change which reduces the use of the Welsh language within the authority.

**Question 5: We have asked 2 specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them:**

There are broader questions around functions (planning) that should also be considered. There are two planning authorities within Powys which is not conducive.

The BBNPA has as many planning officers as Powys but only deal with approximately half the applications (between January and March 2017 BBNP determined 142 applications, Powys determined 346). Powys would support a single planning authority for the whole of Powys including the Park area which could present opportunity for further savings and reduce any duplication.

We do not support the proposed changes, as they have been prompted only by the need to reduce financial costs. The original numbers were put forward to reflect the unique position that the BBNPA is in, with seven local authorities involved. Any reduction would mean a reduction in democratic local representation. What is required is consideration of a new governance requirements, linked to local accountability and based on the emerging white paper on the future roles of National Parks.

It is necessary to recognise the fact that the BBNPA was established in a different way to the other two National Park Authorities in Wales originally and comprises 9 local authorities. However only 7 of these authorities are represented on the BBNPA. However 80% of the Park area is within Powys.

Because of its status and designation together with the approach taken by the BBNPA Planning Department the Council is of the opinion that the Park area is being disadvantaged economically by the policies of the BBNPA.

The National Parks Policy Review Committee made a recommendation in 1974, now known as the 'Sandford Principle', i.e.

"Where irreconcilable conflicts exist between conservation and public enjoyment, then conservation interest should take priority."

This principle was updated in the 1995 Environment Act, to say;

"If it appears that there is a conflict between those purposes, [the National Park Authority] shall attach greater weight to the purpose of conserving and enhancing the natural beauty, wildlife and cultural heritage of the area"

**In other words:** If there is a conflict between protecting the environment and people enjoying the environment, that can't be resolved by management, then protecting the environment is more important.

This cannot be justified in today's economic climate. The Council would therefore welcome greater co-operation between the BBNPA and the Council in relation to Economic Development.

Responses to consultations are likely to be made public, on the internet or in a report. If you would prefer your response to remain anonymous, please tick here: