



4 February 2010

Tina Blandford
Defra
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Dear Tina

Re: Consultation on a new National Parks and Broads Circular and Vision Statement

CCPR is the national alliance of governing and representative bodies of sport and recreation. Our 314 members - organisations as diverse as The Football Association, British Water Ski and the Ramblers' - represent 150,000 clubs across the UK and some 8 million regular participants.

CCPR provides these organisations with a single, independent voice ensuring that their interests are represented and that they have the skills and capacity to deliver high quality sport and recreation across the country. In the context of this consultation CCPR speaks for those members interested in land and water for recreation.

1. Are there any aspects of the purposes, governance, and delivery of duties you feel have not been given proper attention in this document? If so, what needs to be changed?

Current Natural England (NE) Policy is centred on the achievement of benefits to both conservation and recreation. As part of the delivery of Natural England's position on access for example, they state that access opportunities must be 'the least restrictive possible and promote multi-purpose use for the widest number of people'. This is the modern approach and the development of the *least restrictive principle* introduced under CROW and which is now forming the basis for the implementation of the new coastal access rights under the Marine and Coastal Act 2009, provides an excellent basis for future management of National Parks. The least restrictive option to restrictions and exclusions under CROW has proved very effective and there are now many examples of best practice based on this principle. It is essential that this principle is recognised in

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the Circular.

For example, temporary bird nesting restrictions for the protection of wild birds operate successfully on a voluntary basis. With increasing numbers of key species nesting in and around climbing crags there is a need for a set of guidance measures, applicable to all parties, on the need and extent of bird restrictions – adopting a consistent, evidence-based approach and developing best practice. The CCPR view is that it is essential that the *least restrictive principle* is applied to areas used for recreation, and that the benefits of the current system of negotiating and managing access restrictions is used when citing best practice. This approach means that climbers, hill walkers and visitors to the natural environment not only respect the need for some form of conservation (section 4.2) but also become more aware (section 4.3). This principle has worked well under CROW and reiterates the importance that the lowest level of restriction is needed to achieve National Park purposes.

Natural England's policy which is to bring benefits to both conservation and recreation, and the development of the least restrictive principle, has also proved an excellent basis for the development of an evidence-based approach and the making of appropriate management and conservation decisions. All Natural England's work, from strategy to delivery, is underpinned and supported by sound evidence. This philosophy is demonstrated by 'Best of Both Worlds' (supported by Natural England) which uses real-life case studies to show that both conservation and recreation can take place side-by-side.

2. Are changes needed to the circular to ensure it affects the activities and decisions of all those who contribute to the delivery of National Park and/or Broads purposes?

Although partnership work is mentioned on several occasions the document focuses on national agencies and neglects the role that National Governing Bodies of sport and recreation (NGBs) play in the role of delivering recreational opportunities. NGBs play a vital role in developing good practice and disseminating this via clubs and providers, to ensure access is appropriately utilised.

3. Are the priorities set out the right ones – will they help to deliver the vision? If not, what should change?

It is essential that the fundamental principles that National Parks rest on: landscape and nature conservation, the understanding and enjoyment of the National Parks, local communities and the rural economy, all sit alongside each other and have at their heart people and outdoor recreation. The special landscapes of the National Parks have no value if they cannot be explored and enjoyed. Outdoor recreation is a fundamental attribute of our National Parks, is intrinsically valuable in its own right, and needs to be more clearly expressed in the Circular. People and landscape together create the value of our National Parks and not the landscape alone.

Recreational opportunities should sit along side other fundamental principles of National Parks to help achieve the vision for 2050, including that, 'They will be outstanding examples of how people can access our

finest countryside and coasts, so helping people gain health and spiritual benefits of being in the great outdoors.'

**4. Is the vision achievable by 2050 in the current economic climate?
How could it be achieved more quickly?**

Successful partnership working based on commonly understood aims is key to achieving the vision for 2050. Increasing access opportunities while also protecting, and increasing, biodiversity can be achieved but it requires partnership working across government, NGOs and user-groups. CCPR specialises in finding consensus amongst NGBs, for example it played a key role in finding agreement in during the formulation of CROW, it also re-established the Adventure Activity Industry Advisory Committee (AAIAC) which unified safety standards with the creation of Adventurmark and was a partner in the establishment of 'Best of Both Worlds' which is the premier site for the dissemination of information relating to resolving conflict between access, conservation and biodiversity issues. Such partnership work will be vital in achieving the vision for 2050 especially during uncertain economic times.

Yours sincerely

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