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**National Assembly for Wales, Environment and Sustainability Committee
Annual scrutiny of Natural Resources Wales 2015
Response from the Open Spaces Society**

- 1 The Open Spaces Society is Britain's oldest national conservation body, founded in 1865 and this year celebrating its 150th anniversary. The society campaigns for common land, town and village greens, open spaces and public paths and people's right to enjoy them, in town and country throughout Wales and England. We are pleased to have the opportunity to make a submission to the annual scrutiny of Natural Resources Wales (NRW) and wish to make the following points to the committee.
- 2 When NRW was established we expressed concern that its work on landscape and public access (ie the areas covered by the former Countryside Council for Wales) might become subordinate to the work of the former Environment Agency and Forestry Commission, which were much larger bodies. This concern remains: we do not find that NRW champions the cause of landscape and public access as well as it might.

Common land

- 3 In particular, we continue to argue that the common land of Wales (around 175,000 hectares, covering about 8.4 per cent of the land area, with immense public interest) is not sufficiently regarded by NRW. Common land has immense public interest, 45 per cent is within a national park, 36 per cent is a site of special scientific interest, and all commons have a public right to walk and on many there is a right to ride too.
- 4 So commons contribute enormously to the natural habitat and landscape and people's enjoyment of Wales. Yet NRW seems rarely to consider commons as an entity. It should appoint a member of staff whose job it is to champion common land and ensure the public interest is maintained and enhanced.

- 5 An example is NRW's position on and evidence to the recent public inquiry into the exchange of common land, under section 16 of the Commons Act 2006, to allow the construction of the Circuit of Wales motorsports development on a square mile of registered common land. NRW put together evidence which demonstrated that the criteria of section 16 of the Commons Act had not been met, yet it undermined the force of this by not objecting to the application.
- 6 NRW could also ensure that more use is made of the Commons Forum, which at present meets only occasionally and whose views and input are rarely sought or heeded.

Public rights of way and access

- 7 NRW's work on public rights of way is pretty low-key. For instance, we cannot find anything on the website about its concordat with the British Horse Society regarding encouragement of riding on forestry land which it owns. It does not appear to be monitoring the work of the highway authorities in getting the public paths in good order for enjoyment by all. While its work on the Wales Coast Path is commendable, it needs to have full regard to the thousands of routes which are not promoted but which are a part of our historic highway network and of vital importance to the Welsh people and culture, and to visitors.
- 8 We are concerned that there is too much focus on funding for new cycle tracks and not enough on ensuring that the mass of ordinary paths are maintained to a basic standard.
- 9 While we are pleased that NRW completed the review of access land under the Countryside and Rights of Way Act 2000 in a swift and efficient manner, we do not find that it is promoting public access to access land, or helping to address encroachment issues such as fencing.
- 10 Kilvey Hill near Swansea is an example where access should be promoted, for the population living on its door-step (walkers, riders and carriage-drivers). Much of it is mapped as access land but is not available for public access. Despite our pressure and questions NRW appears to do nothing.

Urban spaces

- 11 Green spaces in cities, towns and villages are of immense importance to the local population, as green lungs for refreshment and relaxation. We should like to see NRW championing these.

Website

- 12 We find the website astonishingly uninformative. We would have expected there to be clearly-signposted sections on landscape, public access, public rights of way, nature conservation etc. Instead we can only find information by using search terms, but these are unhelpful too.



- 13 A search for ‘common land’ only gave us a reference to open access land; searches for ‘right of way’, ‘rights of way’, ‘public paths’ and ‘village green’ drew a blank. ‘Access’ gave us three references. This is deeply regrettable.

Conclusion

- 14 NRW is well placed to provide leadership, clarity and profile to Wales’s unparalleled landscape and ecology and people’s enjoyment of them. It seems not to be doing this, instead keeping its head down with little promotional activity. We believe it should seize these opportunities to celebrate, champion and promote its areas of concern and interest, to the public benefit.

Kate Ashbrook
General Secretary
10 April 2015