

## Appendix 1

<b>Document title and version</b>		<b>NIEA - Policy Position Statement on the Establishment and Management of Country Parks</b>			
<b>Document distributed on</b>	2/1/13	<b>Comments due by</b>	15/2/13	<b>Send comments to</b>	richard.orr@doeni.gov.uk

### General observations and comments

In general Belfast City Council would support the broad thrust of the detailed report on the policy position statement on the establishment and management of Country Parks. At a regional level NIEA's Country Parks complement other public open space provision and are extremely important given the limited opportunities the public have to experience natural habitats. Within Belfast and the wider conurbation the NIEA Country Parks are important in particular the closer sites of Colin Glen Forest Park, Crawsfordburn, Redburn and Scrabo. We welcome the acknowledgement of the importance of Country Parks and the acceptance of the wider benefits and outcomes these sites create in relation to the economy, health, environment, tourism and recreation. The Council would also support a statutory designation for country parks as this currently is not a designation under NI legislation.

The only part of the document which might impact on Belfast in the future is the reference in Chapter 8.2 to potential alternative management options, including the suggestion that the Country Parks managed by NIEA should be run by local authority's pg 43-45 and pg 63. However, seven of the eight country parks that are currently managed by the NIEA do not reside within the Belfast City Council boundary area now and post RPA and therefore do not have any direct impact on the Council's current or future resources. However Colin Glen Forest Park is currently owned by the NIEA and is contract managed by the Colin Glen Trust. Colin Glen Forest Park will lie within the new Belfast District Council boundary area post RPA, therefore the Council would seek further clarification and involvement around any future changes to current arrangements and the likely impact this may have on the Council. Under local government reform the Council would require significant additional resources in order to undertake any additional form of operational management and environmental education actions.

Throughout the report there is reference to the importance of environmental education and the opportunities Country Parks provide to deliver this service. However, it is with great disappointment that we note the lack of provision by NIEA of environmental education. The reinstatement of NIEA environmental education service should be given top priority. Furthermore funding towards environmental education has been drastically cut hence other organisations do not have the resources to deliver these services. Belfast City Council considers that the NIEA should deliver environmental education across all Country Parks. The Council is extremely disappointed to see that the Department is considering the disposal of Redburn Country Park which is a key resource in the wider Belfast area. Prior to any disposal of land and/or reduction of public access we would assume that consultation will be undertaken with the general public.



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2.0	Executive Summary	<p>In relation to the first paragraph on pg 3 around the definition of a country park, the Council queries the use of the term <i>“in a managed rural setting”</i>. What is meant by this? We would suggest revising the wording slightly as some country parks may not be considered “rural” for example Redburn and Colin Glen Forest Park.</p> <p>We would suggest that the wording in Appendix 1 could be used <i>“which would provide for safe, countryside recreation, primarily for urban dwellers, in a variety of natural settings including the coast, woodland, river corridors, lakesides, hills and peatland.”</i></p> <p>Given increasing urbanisation and the fact that Country Parks “were acquired and developed by Government, largely to provide the urban population of Northern Ireland with managed open space for countryside recreation” – Page 4, we would suggest that the above statement is either amended or clarification provided.</p>
3.0	Introduction	<p>Belfast City Council would like to know the status of Colin Glen Forest Park? Page 4 refers to “Degraded lands” at Colin Glen and from the document it appears that the NIEA does not consider Colin Glen a Country Park. It is not listed as a Country Park in the Appendices and the only reference is in relation to its attainment of Green Flag.</p> <p>The use of the term degraded land could be misconstrued given its high nature conservation importance.</p>
3.1.5	Management	<p>Should the Department introduce charges at sites, whilst regrettable we would consider a modest charge for car parking more appropriate than charging individuals an entrance fee. All revenue generated should be reinvested into the sites. If this approach was taken it is likely the public would be more willing to accept a charge.</p>
3.3.2	Government strategies	<p>The report should mention that the NI Biodiversity Strategy is currently being reviewed and in the absence of this refer to the EU 2020 strategy to facilitate future planning.</p> <p>We agree with the statement on Page 9 <i>“While there is some scope for increasing revenue at NIEA Country Parks the greatest economic impact is through adding to the options for ‘great days out’ which help hold tourists in a local area where they spend on food, accommodation and souvenirs”</i> and would have concerns with the drive to adopt a more “commercial focus”.</p> <p>Page 9 states <i>“NIEA Country Parks are managed to enhance the quality of life and well-being of visitors and to promote responsible environmental attitudes.”</i> It must be recognised that environmental education and awareness is required to achieve behavioural change.</p>

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<p>3.3.3</p>	<p>DOE and NIEA policies and strategies</p>	<p>Page 9 - The current <b>NIEA Corporate Plan</b> (2009-12) envisions NIEA as being ‘<i>recognised as the leading body responsible for protecting the environment and heritage of Northern Ireland</i>’ and raising environmental awareness ‘<i>through the interpretation and exemplary management of our properties</i>’ Whilst we welcome this statement it is important to note that in order to achieve this it is important that interactive engagement with the public through events and education provision both for children and adults e.g. through training, volunteering opportunities are provided.</p> <p>Page 10 - <i>Through its country parks NIEA can contribute to <u>all</u> of these outcomes, most notably by engaging the wider public in the natural heritage conservation agenda by providing them with the opportunity to learn about and interact with nature.</i></p> <p>While we consider this very important NIEA needs to allocate more resources to this in order to achieve it.</p>
<p>4.1</p>	<p>Vision</p>	<p>The vision as outlined on Page 12 is not aspirational and is weakened by the use of terms such as “will seek”.</p> <p>The Council would suggest extending the vision to include areas such as:</p> <ul style="list-style-type: none"> <li>• habitat enhancement and restoration,</li> <li>• best practice management and the use of Country Parks as demonstration sites</li> <li>• research and development</li> <li>• key environmental education hubs for a range of stakeholders both for formal and informal education purposes</li> <li>• opportunities for volunteering and training in conservation.</li> </ul>
<p>4.2</p>	<p>Mission Statement</p>	<p>There is no reference to protecting the environment and heritage of these sites which is surely the key reason people visit these sites.</p> <p>The text “<i>They provide opportunities for the public to experience a variety of natural habitats, heritage and landscape features and to interact quietly with nature</i>” should be in bold as this is a key function of Country Parks.</p>

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4.3	Management Values	<p>The Council would question whether the management values outlined in (4.3) are sufficient in relation to the mission statement and aims in (4.2). The management values are so visitor focused and the Council would question whether they provide a balance in preserving the ‘<i>special areas</i>’. For example some visitors may undermine the nature of some of the country parks if not controlled e.g. mechanical outdoors activity.</p> <p>The statement “<i>Management will follow sound environmental principles, with a <b>presumption</b> towards conserving the natural and historic heritage.</i>” <i>The use of the word presumption weakens this statement.</i> As previously outlined the natural habitats, heritage etc are the main reasons why people visit and value country parks.</p>
5.0	Selection	<p>“<i>NIEA is unlikely to take on the acquisition, development and management of additional country parks in the foreseeable future. It may, however, seek to acquire additional lands to enhance existing country parks</i>”</p> <p>This is disappointing given the previously demonstrated importance and wider benefits that country parks bring to the economy, health, environment, tourism and recreation. In addition the suggestion of land disposal is also concerning given the importance and benefits of these sites at a regional level.</p>
6.0	Declaration, establishment and quality control	<p>6.2 Refers to Colin Glen Forest Park achieving Green Flag but this site is not mentioned throughout the rest of the document.</p>
7.0	Management	<p>“<i>Country Parks have been central to the development of NIEA experience in managing land for conservation in Northern Ireland, necessary not just to conserve their features but also to determine and demonstrate best practice and to provide sound advice to others.</i>” –</p> <p>This is a key point however, throughout the document it seems NIEA is moving away from this objective as outlined in the vision and mission statement. This is a key function of country parks and should be built upon. There are opportunities to share best practice and train external bodies such as Local Authorities, other government departments, NGOs etc. The introduction of the Biodiversity Duty places requirements on all public bodies and NIEA could use country parks to raise awareness and train public bodies. Country Parks could also offer volunteering opportunities at all these sites.</p>

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7.1	Management planning	Section 7.1 states “ <i>The major features for which NIEA manages its country parks are the provision of public access, information and education</i> ” yet there is no education provision.
7.2	Management Logistics	7.2 There is no mention of Colin Glen Forest Park here.
7.3	A stimulating, safe, enjoyable countryside experience for all visitors	<p>7.3. We would suggest starting this section with the text in Section 7. 3.3 Amenity but to expand it to cover access provision, facilities etc.</p> <p><i>“The suite of NIEA Country Parks was chosen because the properties had ‘intrinsic appeal’ in terms of their scenic quality and special features including seashore, rivers, woodland, panoramic views, interesting buildings and natural habitats. NIEA will seek, through multidisciplinary working groups, to ensure that completed <b>developments</b> do not detract from the attractiveness of these sites.”</i></p> <p>In addition any proposals should not detract from the scientific value of these sites. Recreational facilities, trails etc should only be developed if appropriate and sensitive to the site.</p>
7.3.1	Health and Safety	The Council would suggest that the first bullet point of the health and safety standards outlined in 7.3.1 is moved to the previous paragraph outlined in 7.3.
7.3.4	Equality of Opportunity for all visitors	We would recommend that in section reference is made to the Equality Impact Screening form attached in Appendix 13
7.4	Provision of appropriate countryside facilities	<p>7.4 states that NIEA country parks have been selected and are managed to be able to absorb large numbers of visitors engaged in a wide range of activities. The Council would be keen to know if this has ever been assessed?</p> <p>We would welcome the forward thinking approach outlined on page 23 which makes reference to facilities and provisions that NIEA may supply at chosen country parks. It is hoped that the reference to natural habitats where visitors can experience nature refers to habitat creation and/or restoration proposals.</p>

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7.4.3	Specialist Features and Activities	<p><i>NIEA is pleased to facilitate many such activities where these are compatible with the management values for the park and reasonably can be accommodated without impinging on the enjoyment of other visitors.</i></p> <p>However, the management values as previously outlined are not strong enough to ensure protection of the natural and heritage features.</p>
7.4.7	Management of Specific Areas, Facilities or Services by Third Parties.	<p>We would suggest that prior to any changes of use and/or the reduction in public access, public consultation should be undertaken.</p>
7.5.1	Environmental Principles	<p>“The use of peat products and tropical hardwoods will be avoided” – As the leading body responsible for protecting the environment and heritage of Northern Ireland, NIEA need to demonstrate a strong leadership and advocacy role on these crucial environmental issues.</p>
7.5.2	Habitat Management	<p>The draft report doesn't seem to specify anything about surveying/cataloguing their current woodland structure. On page 28 of the document under 7.5.2 Habitat Management paragraph two, <i>'most areas will be managed ... for example in undertaking woodland management.</i> It certainly covers new planting, favouring native trees etc however the Council would suggest that the NIEA should be undertaking an inventory/survey of their current tree stock/woodlands, primarily identifying hazardous trees, as the countryside parks are well used by the public (hence the duty of care). Also by surveying their trees, it would certainly give clearer and informed direction as to what tree species they should be planting/re planting in the future.</p> <p>The NIEA position statement on IAS refers to controlling and or eradication measures on any IAS which is known to be causing an adverse impact on the properties. We would recommend the insertion of “or have the potential to adversely impact”. As by the time impacts can be demonstrated it will be too late to eradicate them with control as the only option. There should be provision for <b>rapid response</b> mechanisms to be undertaken.</p> <p>Links should be made to the Northern Ireland IAS Strategy and the potential contribution of these sites to investigate and demonstrate best practice approaches to IAS control.</p>

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7.6.2	Customers	We would recommend the development of friends and/or volunteer groups to assist with the care and promotion of specific features as proposed on page 31.
7.7.1	Customer Care	<p><i>“Country Parks afford NIEA with an excellent opportunity to engage the public on environmental issues and to promote the conservation of the Northern Ireland natural and built heritage, environmental protection and sustainable use of the earth’s resources. NIEA will promote good visitor behaviour and adherence to the Northern Ireland Country Code and ask visitors to take their litter home”.</i></p> <p>We believe this is positive but needs resourced and as outlined in section 7.8.2 the most effective means of relaying a message is often by direct contact with another person.</p>
7.8	Enhanced visitor appreciation of and commitment to the environment	<p><i>NIEA will use its country parks to influence both the behaviour of visitors while in the Parks and the way they treat the wider countryside and their environment in general by providing opportunities to acquire the knowledge, values, attitudes and commitment needed to protect and improve the environment.</i></p> <p>This statement only makes reference to signage, while this is positive there is much greater potential for meaningful engagement to take place otherwise the opportunity to affect behavioural change will be lost.</p>
7.9	Inspiration Interpretation	<p><i>NIEA is committed to capturing the imagination of visitors to its country parks, particularly of children, on the wonders of the natural environment and the local history of the area.</i></p> <p>While the sentiments in this section are welcome, trained and experienced staff are required to deliver these.</p> <p><i>Taken collectively, the suite of NIEA country parks affords a wonderfully diverse range of settings, landscapes types, habitats and species on which to provide information and engage the visitor’s imagination.</i></p> <p>We agree with this statement but it needs to be interactive to affect behavioural change.</p> <p><i>NIEA considers that environmental education is critical in achieving awareness of the environment and instilling the values, skills, attitudes and behaviours consistent with sustainable development.</i></p>



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		<p>This statement is extremely important and needs to be resourced on a site basis to maximise usage by both schools and the wider public. NIEA should develop education/training opportunities in the widest sense in particular for adults.</p> <p><i>NIEA will seek to maintain the appropriate staff skills, knowledge and professional expertise needed in order to ensure the quality and educational relevance of resources it provides.</i></p> <p>The Council would recommend this as a priority.</p> <p><i>While NIEA is not currently resourced to employ professionally qualified educators to provide formal environmental education, it will continue to make available to other providers its education facilities and curriculum-related materials.</i></p> <p>Throughout this policy document it is acknowledged that country parks provide a key opportunity to deliver environmental education however, NIEA are not resourcing this. Furthermore funding towards environmental education has been drastically cut hence other organisations do not have the resources to deliver it. Environmental education should be prioritised including guided walks, talks, tours, enabling hands on experiences of the natural world. These should form a core part of each site work/ management plan.</p>
7.11	Accounting and value for money	<p>The annual figure of over 1.6 million people to these sites demonstrates their popularity and overall benefits regionally. The cost of £1 per visit appears to demonstrate good value for money.</p> <p>The reduction in resources for the operation of Country Parks, with consequent reduction in the quality, maintenance and service provision is very disappointing given the importance of these sites, the high levels of usage and the vast array of valuable services provided.</p>
7.12	Monitoring	<p>The council would be keen to see the key performance indicators used to measure and monitor the performance of NIEA country park management. This section seems quite light, the Council would be keen to see exactly how NIEA country parks will achieve the outcomes outlined as part of the vision at the start of the report.</p>

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8.2	Potential alternative management arrangements	<p><i>All seven NIEA country parks include areas of important habitat and five have lands designated for nature conservation.</i></p> <p>This is a key point but is not robust enough throughout the report. These sites are of International and National importance and should be showcased. Four of the listed 7 sites are of European importance namely; Peatlands, Ness, Roe Valley and Crawsfordsburn and 5 are of National importance with 1 under consideration for ASSI designation.</p> <p><i>The country parks provide NIEA with its most important interface with the Northern Irish public. They enable NIEA to promote important messages on a wide range of topics (see 7.7, 7.8 and 7.9) and in particular to engage with children whose awareness of ‘green’ issues is likely to determine their commitment to the environment when they grow up?</i></p> <p>We would agree that an interface between the public and central government is critical but this needs to be interactive.</p> <p><i>NIEA seeks to provide its visitors with more than just a pleasant walk in the countryside. By explaining to visitors what they see in its parks and why the park environment is the way it is NIEA aims to enhance their experience in the countryside and to build a community committed to environmental conservation. We would query the fact that there is currently no provision to deliver this. The Council agrees with the concept that these are national assets and should be managed at a Central Government level</i></p>
13	Appendices	
	Equality Impact Assessment	<p>There was no reference throughout the report to Appendix 13 DOE Section 75 Equality of Opportunity Screening analysis form.</p> <p>Appendix 13 Equality of Opportunity Screening analysis form hasn't been completed</p>
	Rural Impact Assessment	<p>There was no reference throughout the report to Appendix 14 Rural Impact Assessment.</p>

**Notes:**

1. ***If you have no comments to make, please enter 'no comment' in line 1 of the above table.***
2. ***Add additional rows to the above table as required.***