



Mr Julian Atkins
Chief Executive
Brecon Beacons National Park Authority

28th January, 2021

Dear Mr Atkins

BMC Cymru is disappointed that yesterday (27th January 2021) the Brecon Beacons National Park Authority announced it would close large areas of access land and many public rights of way, without any consultation with representative bodies like us. This closure will reduce the freedom of many local people to exercise from their front door (as permitted by the regulations), despite Welsh Government guidance which recognises that “Exercise is important for physical and mental health” and states that “you can leave home as often as you like to exercise as long as you do so from home ... All time spent outdoors is beneficial, as long as people avoid interacting with people they do not live with.” (<https://gov.wales/alert-level-4-frequently-asked-questions#section-58322>). In June 2020, the Park stated that it was removing access restrictions because “Evidence is emerging that outdoor spaces are less risky in terms of transmission” (<https://www.beacons-npa.gov.uk/coronavirus-covid-19/closure-rationale/>). We are interested to see the evidence that has changed the park’s position since then.

Given the overwhelming evidence that COVID is not transmitted outdoors, the enormous benefits of outdoor exercise, and the desirability of allowing people to spread out as much as possible when exercising, we do not believe these closures of open spaces are either proportionate or effective in reducing transmission. The regulations state that people should not drive for exercise, and given this, we understand why the authorities may wish to close car parks and laybys (although we also note the exemptions in the regulations for mental and physical health issues). However, we do not see that closing access land is necessary *in addition to* car park closures. The regulations permit closure of access land and rights of way only if necessary to prevent “large numbers of people congregating or being in close proximity to each other” or “a high risk of exposure to coronavirus”. Neither of these seem likely if people can only access the area by foot or bicycle. Closing access land does not make it any easier to enforce prohibitions on driving, since any enforcement will realistically only be undertaken at the roadside. In short: closure of access land seems to offer no additional benefit in reducing COVID transmission or enforcing regulations, once the car parks are closed.

We are also surprised and disappointed that this action has been taken without consulting BMC Cymru and note that the “closure rationale” published on the Authority’s website indicates that the most recent review of the closures with relevant partner organisations occurred on Thursday June 18th 2020: <https://www.beacons-npa.gov.uk/coronavirus-covid-19/closure-rationale/>. BMC Cymru is the recognised representative body for climbing and hillwalking, representing over 7,000 members in Wales, including many who live in or near our three National Parks. Throughout the crisis, BMC Cymru has tried to work constructively with the National Parks and other land managers, to ensure that important information about COVID regulations is clearly communicated to our membership and the wider outdoor community (see e.g. <https://www.thebmc.co.uk/wales-lockdown-part-3-what-it-means-for-climbers-and-hillwalkers>). We are strong advocates for sustainable and responsible outdoor activity, frequently promoting messages such as the need to be considerate of local communities. Therefore, the Authority’s decision to make these closures without any consultation

with us or similar bodies is disappointing. If the Authority thinks that access rights should be restricted, we believe it should consult with representative bodies and provide clear, well-evidenced justification that its approach is necessary and proportionate: decisions to restrict public rights of access should not be taken summarily or without proper consultation. We remain ready to work constructively with Brecon Beacons NPA and look forward to the Authority engaging constructively with BMC Cymru and other similar organisations in future.

Given the concerns outlined above, we have submitted alongside this letter, a Freedom of Information request asking the Brecon Beacons National Park Authority to provide us with:

- 1) The assessment undertaken by the Brecon Beacons National Park Authority that this closure of access land and rights of way is a necessary and proportionate means to prevent transmission of COVID, in addition to the closure of car parks and laybys and other enforcement actions by the police.
- 2) A list of organisations and individuals whom the Brecon Beacons National Park Authority consulted about this closure of access land and rights of way, and the dates on which they were consulted.

Yours sincerely

Neal Hockley
Chair, BMC Cymru

CJ Griffiths
Vice Chair BMC Cymru
National Council Rep, De Cymru/South Wales
Brecon Beacons National Park Ambassador

Dorian Thomas
BMC Area Chair, De Cymru/South Wales

Anne Vowles
Chair, Mountain Training Cymru
Committee Member, BMC Cymru

Elfyn Jones
BMC Cymru Access & Conservation Officer