

Letter to Deputy First Minister and Cabinet Secretary for Climate Change and Rural Affairs, Huw Irranca-Davies MS, on the NRW Proposal for Organisational Change and its impact on communities across Wales.

Dear Deputy First Minister

We are writing to you as the combined representatives of the mountain bike community in Wales, and connected outdoor sector businesses. We are alarmed by the recent news regarding the Natural Resources Wales (NRW) Proposal for Organisational Change, specifically the proposed drastic reduction in budget and staffing relating to outdoor access and recreation, the direct impact this will have on mountain bike trails across Wales, and the subsequent knock-on effects this will have on the health, wellbeing and prosperity of local communities. We are also very concerned about the impact of the proposal on NRW's three visitor centres, and especially of any prolonged closure of these centres before partners are selected and able to take over their running, and the impact this would have on the economy of the areas surrounding the centres.

However, this does provide a moment to pause and reflect, to consider how we want to manage our outdoor spaces moving forward to maximise Wales's potential, as a progressive and forward-thinking nation and a leading adventure tourism destination in Europe.

We have the following five asks of the Welsh Government as a result, which we detail at the end of this letter:

1. A sustainable, meaningful and ongoing investment in maintaining and developing NRW's existing mountain bike trails.
2. NRW to materially improve its approach to working with volunteer groups, so that they can help maintain and develop Wales' mountain bike trails.
3. To ensure that either NRW's visitor centres are not closed, or that the tender and contract processes for them are expedited so they are closed only for a very short time.
4. NRW properly consider local community groups as candidate partners to take on the running of these centres.
5. That the Access Reform Programme be unfrozen, prioritised and included within the current Programme for Government.

The value of mountain biking to Wales

Mountain biking contributes greatly to the health and well-being of the Welsh population. Research by the Wales Adventure Tourism Organisation (WATO) estimated that just a 10% increase in recreational activity would yield £187m of social returns. It stands to reason that a 10% decrease in activity would have the opposite effect.

Mountain biking is a cornerstone of outdoor recreation in Wales, attracting thousands of visitors annually and generating significant economic benefits. The Wales Visitor Survey (2019) shows that 15% of UK staying visitors and 10% of day visitors to Wales came for mountain biking – rising to 19%/14% in the shoulder season. New research in 2023 on the [Economic and Social Evaluation of the Outdoor Activity Sector in Wales](#), funded by the Welsh Government, suggests a

total net impact from trips associated with mountain biking in Wales to be £182 million annually with 4,603 jobs supported. It also shows a total net impact from trips associated with outdoor activities in Wales to be £1.619 billion annually with 31,278 jobs supported, which is 21% of all tourism jobs in Wales.

Mountain bike trails in Wales

Wales has a strong claim to be the birthplace of modern mountain biking, with the opening of the world's first trail centre at Coed-y-Brenin in 1996, a model that went on to be replicated in hundreds of locations around the world. Since then, following hundreds of millions of mostly EU capital spending, over 500km of official mountain bike trails have been built on NRW land.

NRW is responsible for the maintenance and development of these trails, but over the last decade has spent progressively less and less on their evolution and upkeep, meaning they are now in a sorry state of repair, with some, like those in Penmachno, either closed to the public for safety reasons, or virtually unrideable due to their condition and lack of vegetation management.

If NRW's proposal is implemented, it will inevitably result in the rest of NRW's trail network suffering the same fate as Penmachno, with trails quickly becoming either unrideable or closed, as there will be inadequate budget and resources to maintain them, with obvious direct impacts, not just on the users of the trails, but also on the communities around them. If these trails are to safely stay open, then both meaningful funding and a radical change of approach is required.

Volunteer groups have come forward to offer to help maintain and develop these trails, but NRW have reacted glacially and unenthusiastically in response, and there are only a couple of examples across Wales, where a volunteer group have been given permission to help maintain official NRW trails. In one of these cases, the volunteer group had to spend five years battling NRW red tape before gaining permission to work on their local NRW trails.

Community-built trails

As the NRW trail network has stagnated and deteriorated, volunteers all over Wales have taken things into their own hands, come together, and created their own community-built trails. Data from a 2024 survey by the UK MTB Trail Alliance, shows that there are an estimated further 1,200km+ of these community-built trails in Wales, the majority of which are on NRW land. These trails have been built without NRW's permission, and as the landowner, NRW is exposed to the associated liability risk. NRW have not always responded as positively to these trails as they might, despite these trails being created at no cost to NRW, and their obvious benefits to the health, well-being and economy of local communities.

NRW's stated strategy is to work with these volunteer groups in order to mitigate the liability risk, helping them to formalise and come to contractual agreements for these groups to manage their own trails. However, it has proved organisationally incapable of this. The volunteer groups it has trialled this approach with are still drowning in internal NRW red tape over two and half years later, with no tangible progress made, and with these groups still not officially allowed to maintain their own trails, leaving this valuable resource, that has been gifted to the Welsh taxpayer, under threat.

Visitor centres

Whilst we appreciate the financial challenges that NRW face, decisions on NRW's finances have to be considered in light of their impact on the wider economy. Whilst NRW's operating loss for a site like Coed-y-Brenin might be £325k per year, the local economy is likely to lose far more if the

services at the site are impacted. Reducing support for outdoor tourism infrastructure also directly contradicts the Wales Tourism Strategy's goals of promoting Wales as a leading destination for adventure tourism and outdoor activities.

The importance of ancillary facilities at trail centres should not be underestimated. Mountain bikers will gravitate toward trails that offer a quality ride and overall experience, which includes access to car parking, information boards, toilets, cafe, changing facilities, bike wash, bike shop etc, all of which contribute to the desirability of a destination. Closure of any visitor centres, even on a temporary basis, will directly impact this experience and make it very likely that visiting riders do not make the trip to Mid/North Wales.

Even temporary closure of the visitor centres will lead to a massive decline in trail usage while the centres are closed, with a resultant shock to the parts of the local economy dependent on those missing visitors - accommodation providers, restaurants, outdoor adventure companies - with many businesses not surviving long enough to witness any subsequent re-opening. This will have a cascading effect on other local businesses, who were dependent on those now defunct businesses for their income. This is particularly concerning in the areas around the visitor centres where tourism is a primary source of income for the local economy.

Once a centre reopens under the management of a new partner, it is unlikely visitor numbers will instantly bounce back to their previous levels, and it will in all likelihood take many years, and a considerable marketing investment, to bring visitor numbers back close to previous levels. It is entirely possible visitor numbers will never recover to their previous levels, with obvious implications for the long-term health of the local economies of the areas surrounding the centres.

NRW Proposal for Organisational Change

The proposal is a regressive step that goes against the Welsh Government's ambitions regarding the health and well-being of the Welsh population, and threatens to undermine a key part of the Welsh economy. It stands in stark contrast to the principles enshrined in the Well-being of Future Generations Act, which emphasises the need for long-term thinking, preventative action, and the integration of environmental, social, and economic well-being. It fails to consider the long-term implications for future generations who will inherit a reduced capacity to enjoy and learn from Wales' natural landscapes.

It also leads us to question, if NRW make these proposed cuts to access and recreation budgets and staffing levels, whether they will be able to meet their statutory duties regarding access and recreation. Specifically, its duties to exercise its functions so as to promote:

- the provision and improvement of opportunities for access to, and enjoyment of, the countryside and open spaces
- open-air recreation
- the study, understanding and enjoyment of the natural environment

As well its duties to have regard to:

- the desirability of maintaining the availability to the public of any facility
- the health and social well-being of individuals and communities
- the economic well-being of individuals, businesses and communities

Consideration must also be given to the impact that the NRW proposal may have on underrepresented groups. Ethnically diverse communities, women and girls and disabled people already face challenges in accessing the outdoors for physical activity and recreation. The 2024

Annual Disability and Activity Survey highlights that less than half, 44%, of disabled people say it's easy to physically access outdoor spaces vs 78% of non-disabled people. Any plans to reduce access to the facilities available at visitor centres will mean that those from underrepresented communities and groups will be placed at greater disadvantage.

Our five asks of Welsh Government

We call on the Welsh Government to direct NRW to:

1. Align actions and budgets with the Well-being of Future Generations Act, ensuring that decisions made today do not compromise the ability of future generations to enjoy the health and access to natural heritage benefits that mountain bike trails provide. There needs to be a sustainable, meaningful and ongoing investment into the maintenance and development of NRW's existing mountain bike trails.
2. Just as importantly, ask NRW to radically change its approach to working with volunteer groups, cutting their internal red tape that's blocking them from doing so currently, or if not, to look at different models to mitigate the liability risk of mountain bike trails on their land (we have some ideas to suggest here). If it can do this, there are volunteer groups standing by all over Wales (the UK MTB Trail Alliance has over 25 member groups in Wales), ready to not just help maintain and develop community-built trails but also those managed and run by NRW, which would obviously help compensate for the finite financial resources available for their maintenance and development.
3. Ensure no decision is taken to close visitor centres, even temporarily, while partners are found to run them, or if they are, then to ensure the tender and contract processes are expedited so the centres are closed only for a very short time. The finances of NRW need to be considered in the context of the wider impact on the economies of the local areas around the centres, and how it will impact the Welsh Government's ambition to grow adventure tourism.
4. We also urge you to ensure NRW properly consider local community groups as candidate partners to take on the running of these centres, and to make allowances for the fact they will be newly formed and immature entities created in reaction to the potential closing of their local visitor centre. They should not be expected to meet the same criteria that NRW would expect of a normal commercial partner.
5. Improve access to the outdoors: The budgetary issues that NRW face, and the subsequent impacts on outdoor recreation opportunities, help shine a light on access issues in Wales. We ask that the Access Reform Programme be unfrozen, prioritised and included within the current Programme for Government. Access reform offers a unique opportunity to open up access and recreation opportunities all over Wales with comparatively little budgetary outlay, to at least partially compensate for the inevitably reduced NRW recreation offering and ensure future generations can access the unique landscapes of Wales. This could also be an opportunity to legislate for a reduced level of occupier liability on access land in Wales (perhaps modelled on [how this works for the coastal margin in England](#)), which, as well as making access reform a much easier sell to private landowners, would also almost entirely remove the liability risk the Welsh Government is exposed to on all of the access land it is the occupier of (including NRW land). If responsible right-to-roam laws can exist in Scotland, Iceland, Norway,

Switzerland, Austria, the Czech Republic, Finland, Estonia, Latvia, Lithuania and even Belarus, why not in Wales? Now is the time to change this.

The current situation requires ministerial-level understanding of the implications of the NRW Proposal for Organisational Change and subsequent pressure on NRW management to limit the impact of these harmful steps on the Welsh populace and economy.

We ask that you find time to meet with us in advance of the NRW Board meeting on 25th September, in order that we can discuss these issues in detail before any final decisions about the proposal are made.

We're hopeful that by working together, we can ensure that Wales remains a leader in outdoor recreation and sustainable tourism, fostering economic growth and community well-being while preserving our natural environment for future generations

Yours faithfully

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Tourism Organisation

All of the below 93 organisations have also individually co-signed this letter:

Advocacy groups:

BMC Cymru
Disability Sport Wales
North Wales Mountain Bike Association
North Wales Tourism
The Outdoor Partnership
Trash Free Trails

Community groups:

Achub Nant yr Arian
Caru Coed y Brenin
Ynyslas Achubwch ein Canolfan

Volunteer groups:

Afan Trail Volunteers
Barry Sidings MTB
Brechfa MTB
Clyne Riders
Cwmcarn MTB Trail Crew
Foel Gasnach Downhill Riders
Kilvey Riders
North Cardiff Trails Collective
Risca Riders

Outdoor sector businesses:

A470 Training
A Cycling
Adventure Beyond
Afan Lodge Hotel
Afan Valley Bike Shed
All Mountain Adventures
Antur Stiniog
Atlas Ride Co
Beics Betws
Beics Brenin
Berwyn Bike Park
Bike Doctor
BikePark Wales
Bike Ranch Snowdonia
BikeShredz
Black Mountains Cycleworks
Brechfa Forest Barns
Bryn Teg House
Cadair View Lodge
Caersws Bike Park
Campbell Coaching
Cycle-Tec

Volunteer groups (continued):

Rudry Riders
Smilog Trails
Tirpentwys Trails
Trail Collective North Wales
TWMBA
Van Road Trails
Wyllie Bike Park

Riding groups:

Breeze North Wales
Breeze South East Wales
Breeze South & West Wales
Clwb Beicio Mynydd Dyffryn Conwy
Clwb Beicio'r Bala
Clwb Beicio Ystwyth
Cwmcarn Paragon Cycling Club
Dreigiau Coed Y Brenin
Oneplanet Adventure Bike Club
Wales Off-Road Academy

Outdoor sector businesses (continued):

Damian Harris Cycles
Drover Cycles
Drover Holidays
Dyfi Events
EC Cycles
Gethin Lodge
Glorious Gravel
Green Events
Hafod Trails
Hope MTB Marathon
Indi Cycle Works
Mini Downhill
Mini Enduro
Mountain View Bike Park
MTB Wales
MudTrek
Old Skool MTB
One Giant Leap Llangollen
OnePlanet Adventure
Outdoor Retreats
Pedal MTB
Pedal Syndicate
ProLine MTB
Revolution Bike Park
Ride High MTB
Rikki Barrett MTB
Snowdonia Bikes
Summit Cycles
The Lodge Staylittle
The Roost Merthyr Tydfil
TrailRippers Project CIC
We Cycle
Welsh Enduro Series
Western Bike Events
Wheelism
Wye MTB