

## **Consultation on the Nature Recovery Plan in Wales**

**10 September 2014 - 3 December 2014**

### **Consultation Responses 61 – 80**

**Ref. 0061 - National Museum Wales**

#### Consultation Questions

**1. Do you agree with the focus of the ambition on addressing the underlying resilience of our ecosystems and identifying and capturing benefits for society? If not, what else do we need to consider?**

Yes, provided that protection of Wales' priority sites and species is to be continued (e.g., p. i). Particularly welcome is the supporting statement's recognition that maintaining and enhancing biodiversity is fundamental to achieving the ambition.

**2. Does the ambition statement capture this new approach fully? What might be added?**

Yes, while it appears with the supporting information mentioned above. It may not always be clear in some contexts that the Nature Recovery Plan is to be Wales' National Biodiversity Strategy, as required by the UN, without such information.

**3. Are our goals the right ones? What might be added?**

They seem to be. Although a specific EU Biodiversity Strategy (EUBS) aim, the phrase achieving 'no net loss' may continue to concern some people who recognise that not all biodiversity is interchangeable; it may also seem less ambitious than the ambition statement's aim to enhance biodiversity. Similarly, connectivity may not always be an equivalent trade for extent; scattered examples of some habitats may provide more cultural services than a single, but remote, one.

To forestall any such concerns, an additional goal (raised from an Action, see p. 16) might be to ensure the widest and soundest possible public understanding of Welsh biodiversity and its values, interchangeable and otherwise. This should include the recognition of Wales' international

commitments and its progress in meeting them. While engagement and an improved evidence base are alluded to in the ways in which the goals are to be achieved, perhaps they could be recognised as goals in themselves. Indeed, they overlap substantially with some of the cultural services that biodiversity provides (Figure 1).

#### **4. Are the actions proposed right and adequate?**

Yes, actions associated with evidence, and research, monitoring and surveillance, and safeguarding species, habitats and species are **essential**.

#### **5. What additional action would you wish to see?**

Should raising public awareness be elevated to a Goal (see Question 3 response), then actions associated with this could be:

- a. Creating a Welsh Biodiversity or Environment Information Service, something akin to Ireland's ENFO ([www.askaboutireland.ie/enfo/](http://www.askaboutireland.ie/enfo/))
- b. Creating a Welsh National Biodiversity or Environment GIS System.

These may be what is meant by “the developing Information Hub” (p. 22) – at least in part – however, they perhaps go further than what is alluded to?

The first provides information to the public, including children. The second is a more ambitious project that would be developed to provide a professional one-stop facility for examining and interpreting the country's biodiversity data holdings. It is essential that Wales accurately understands spatial and temporal patterns of its marine and terrestrial biodiversity. This facility would allow rapid output of maps and other statistics concerning these, as well as their completeness, accuracy, ‘up-to-dateness’, consistency and confidence. Hence, it would provide a strong base for biodiversity funding initiatives and decision-making.

#### **6. How do we engage with business more effectively to deliver our ambition?**

Corporate philanthropy and sponsorship of public biodiversity initiatives

could be further encouraged, perhaps especially from multinationals in Wales whose responsibilities and footprint are furthest-reaching.

### **7. How can we strengthen the way we work together?**

Clarity of the unique roles of partners may in many circumstances reduce the need for competition for resources. Progress in working together can be especially vulnerable to staff shortages and cuts, increased competition and short-term solutions. Goals and commitments should be adequately resourced and may need to be established for longer periods.

Secondments and training opportunities within and between members of the Wales Biodiversity Partnership (and elsewhere) could help achieve better co-operation and mutual understanding.

### **8. How can we share budgets and look at integrated outcomes?**

The 2014 Wales Nature Fund was a positive initiative that showed a great appetite in Wales for open funding for biodiversity action, from a very wide range of stakeholders and partnerships. In practice, however, many worthy projects could not be supported or effectively revised given the late announcement of the criteria and short timescale for delivery. A renewed Nature Fund that addressed these issues would be a useful first step. Additionally, there is a clear need for the funding of longer-term projects — as acknowledged in the consultation document (p. 19).

An ability to share budgets may be compromised at this present time of large budget cuts and austerity measures. Nevertheless, there is much scope for sharing expertise on joint initiatives and projects (see question 9 response).

### **9. What else should be done to avoid duplication and to deliver our goals?**

There would be least risk of duplication when key partners are aware of their unique capacities and roles, something that could be made clear in the national biodiversity strategy. For example, Amgueddfa Cymru – National Museum Wales is a centre for taxonomic expertise, taxonomic and other collections-based research, and specimen vouchering, particularly for the groups that make up most of Wales' priority species

(and many of the invasives). These functions are all critical to the evidence base for biodiversity action yet there is virtually no overlap with those provided by the three constituents of NRW or Universities. The Museum is also is Wales' largest provider of learning outside the classroom, and thus well-placed to partner in engagement initiatives. Its role as the lead provider of these services in Wales could be better recognised in the Nature Recovery Plan and in the Welsh environment sector more generally.

#### **10. How can we best use the Information Hub to collate and disseminate data and evidence?**

A widely accessible digital online archive of grey literature and publications from NRW and others could be extremely useful in raising efficiencies of evidence use, as would relevant data from other organisations. Such initiatives would need to be supported by adequate funding for both startup and maintenance/update phases.

See also suggestions following Question 5 above.

#### **Ref. 0062 - North East Wales Biodiversity Network**

The North East Wales Biodiversity Network was formed in October 2009 and renamed in 2010. It brought together partnerships that had existed in the counties of Conwy, Denbighshire, Flintshire and Wrexham. The broad aim of the network is to conserve, protect and enhance biodiversity for current and future generations. Coordination and collaboration are seen as being important to the partnership alongside other objectives that include raising awareness and the promotion of biodiversity and identifying local priorities to deliver LBAP targets.

The North East Wales Biodiversity Network welcomes the opportunity to comment on the Nature Recovery Plan for Wales and have set out our response below.

Comments regarding the document as a whole

There was widespread agreement that the consultation document is very broad and too vague to offer constructive criticism. We also feel that too much jargon is used without being properly explained, making the

document difficult to understand (this is explained further below). This should be addressed, not by simplifying the concepts, but by providing a) a comprehensive glossary of all terminology used and b) a simplified summary document. We felt that there was inconsistency in the terminology used and the document lacks an understanding of ecology, to a degree.

We are concerned about the lack of delivery mechanisms within the consultation document and the lack of information about the content and format of the NRP when produced.

Responses to set questions

**1. Do you agree with the focus of the ambition on addressing the underlying resilience of our ecosystems and identifying and capturing benefits for society? If not, what else do we need to capture?**

The ambition of the NRP is to “reverse the decline in biodiversity”, which we all agree is welcome, but we are very concerned about the lack of mechanisms proposed for achieving this high aim. We currently can’t stop the rate of decline in biodiversity increasing. The NRP needs to formulate future proposals in the context of past failures to achieve targets and show clearly what will be changed from the previous failed attempts. This currently is largely omitted from the consultation document, for example there is no reference to the National Assembly for Wales Sustainability Committee’s Inquiry into Biodiversity in Wales (January 2011) which looked at the failure of the 2010 biodiversity targets. Without recognition of why we failed and how the NRP will be different, it will not achieve its ambition and biodiversity will continue to decline in Wales and beyond.

Ecosystem resilience is important in addressing biodiversity declines, and we are glad this has been recognised, however we feel that too much is being pinned on resilience; it will not solve all issues – it is not a silver bullet.

There is an underlying assumption in the consultation document that higher diversity is always good, and therefore conversely that less diverse habitats are of lower value. This does not always hold true - different

habitats have vastly differing natural diversity, and some valuable habitats are not very diverse. At a habitat level the assumption that diversity is good isn't always true, and this needs to be recognised.

## **2. Does the ambition statement capture this new approach fully? What might be added?**

We are concerned about the lack of recognition of the intrinsic value of biodiversity. The consultation document focuses on 'what nature can do for us'. This human-centric view risks ignoring parts of the natural world which don't have an obvious economic or ecosystem service benefit, or one which we don't yet recognise.

The ambition should be based on the concept of 'Conservation Status'. The aim of the Habitats Directive is for the maintenance, or the restoration of, the 'Favourable Conservation Status (FCS)' of habitats and species listed under the provisions of the directive. This concept could be applied to the suite of habitats and species considered to be important in Wales. The WG is reminded of duties under Regulation 9 (1) of the Conservation of Habitats and Species Regulations 2010, which requires compliance with the provisions of the Habitat's Directive.

The feel that the ambition should be congruent with those related to the Aichi targets / CBD's Strategic Plan for Biodiversity 2011-2020:

'By 2050, biodiversity is valued, conserved, restored and wisely used, maintaining ecosystem services, sustaining a healthy planet and delivering benefits essential for all people'.

and the EU Biodiversity Strategy (EUBS) (2011)

'By 2050, European Union biodiversity and the ecosystem services it provides — its natural capital — are protected, valued and appropriately restored for biodiversity's intrinsic value and for their essential contribution to human wellbeing and economic prosperity, and so that catastrophic changes caused by the loss of biodiversity are avoided.'

Page 6 states that there are "continuing declines of many species and habitats across Wales despite much work, investment and effort". We do not believe that resources / funding directed towards conservation to date

have been sufficient to prevent biodiversity declines. Existing approaches to biodiversity conservation are not necessarily wrong – in fact there are many examples of successes – and we would expect that additional funding for these would improve success further. In addition, one of the major failures has been the lack of integration of action to halt biodiversity loss across all sectors of government and this does not appear to be being addressed through the NRP.

### **3. Are our goals the right ones? What might be added?**

We are generally supportive of the goals.

### **4. Are the actions proposed right and adequate?**

The ‘actions’ proposed are not really actions, more aspirations. As aspirations we would generally agree, but as actions they are not adequate.

### **5. What additional action would you wish to see?**

We would wish to see the development of this plan into a much more detailed delivery plan with actions towards recognised targets.

Actions need to be based on evidence and research and should be integrated across different sectors and areas of government. The use of SMART targets related to these actions would be welcomed. The targets should be challenging but achievable and measurable.

The proposed review of designated sites and species is concerning. The plan should commit that any review is for the purposes of strengthening, not weakening, the existing designations and legal protection. At present it is ambiguous and we are concerned that through ‘streamlining’ the protection afforded may be reduced. The Lawton Report Making Space for Nature requires protected sites to be bigger, better and more connected. These sites should be at the heart of our efforts to repopulate the countryside with both rare and common species.

The importance of UK designated sites, Welsh Priority habitats and species as well as non-statutory wildlife sites and other important local habitats requires greater emphasis. These sites provide the core from which wildlife can thrive in the wider countryside and their protection and

maintenance is essential if we are to enable nature to recover in Wales.

## **6. How do we engage with business more effectively to deliver our ambition?**

In order to engage more effectively with businesses, we need to better articulate our aims and objectives, otherwise we cannot expect them to comply or even know what our expectations are. This requires spatial plans, similar to the integrated conservation plans used in Germany. There needs to be clarity of expectation, which, even if ambitious, allows businesses to plan and deliver what is required of them. We need to be clear, be firm, be supportive, create incentives and enforce; the approach needs to be 'carrot and stick'. An example of an approach which has worked well is that of the Cross Compliance requirements which quickly achieved a change in the timing of hedge cutting. For decades farmers couldn't be persuaded to change their ways, but the threat of losing subsidies had brought about good practice.

We need to work with the aims of businesses and be flexible in the approach taken: what is required may depend on what the local firms are in an area, e.g. whether they are there for the long term or short term. Their individual needs should be taken into account, as they will not be the same for all businesses.

An environmental award scheme for businesses could be considered.

The recent review by McConville and Tucker (2013) considered:

1. Understanding the practices and underpinning assumptions that other Member States have used in interpreting FCS and setting associated favourable reference values, in particular with regards to widespread species with extensive populations outside Natura 2000 sites;
2. Understanding the practices and assumptions that other Member States have used in determining appropriate population levels and wider habitat requirements for wild birds (in compliance with the Birds Directive).

## **7. How can we strengthen the way we work together?**

At a local level, we work very well together, for example LBAP



Partnerships like our North East Wales Biodiversity Network (Bionet). Most of our work is in partnership with other authorities, organisations, communities and landowners. We have reaped the benefits of working together, achieving things that would have not been otherwise possible, through a range of local projects, such as the Alyn Valley Himalayan Balsam Control Project, North East Wales Orchard Initiative and North East Wales Sand Lizard Project.

We feel the major problem is working together at higher levels. A Sustainable Futures department at WG has been suggested. The existence of spatially-based conservation plans, with targets based on Conservation Status, would go some way to strengthening the way we work together at higher levels. We therefore commend pioneering work being developed for the great crested newt by Amphibian and Reptile Conservation (ARC) in Anglesey, Flintshire and Wrexham. This pilot work needs now to be actioned for a range of habitats and species. The plans should be capable of facilitating and evidencing potentially underused legislation such as:

- The creation management and upkeep of bird habitats under the Birds Directive ;
- The planned provision and management of stepping and linear habitats under the Habitats Directive ; and
- Actions to further the conservation of the living organisms and types of habitat listed under Section 42 of the Natural Environment and Rural Communities Act 2006.

Additional mechanisms are required to address land outside of our control, where landowners have no incentive to work towards halting biodiversity declines – and in some cases are incentivised to carry out practices which continue to have adverse impacts on biodiversity.

This again highlights the need to incorporate all sectors and WG departments into biodiversity conservation, whatever form the NRP takes. Without this, it is unlikely it will be able to reverse the declines in biodiversity and will ultimately fail. It is important that policies for the natural environment are embedded across the whole spectrum of public policies and programmes and this can only be achieved if the

relationships between the concepts of biodiversity, ecosystems services and green and blue infrastructure are recognised within a spatial context. This should be at a spatial scale that enables us to identify the principle components that are necessary to protect and enhance the features of the natural environment and to contribute to the wider context of sustainable development

## **8. How can we share budgets and look at integrated outcomes?**

Within Bionet we do this already, for example using the employment of Biodiversity Officers to draw down grant funding for projects and initiatives, which are either run by partner project groups or complement existing projects in the area. Biodiversity Officers also act as co-ordinators to encourage very different organisations/groups to work together on integrated outcomes, e.g. the Dee Invasive Non-Native Species Project and Big Dee Day – the Invasion events.

In terms of integrated outcomes, biodiversity work lends itself to benefitting other sectors, particularly health (physical and mental), for example practical volunteer tasks and accessible and biodiverse green spaces. This area would particularly lend itself to budget sharing.

It is important for the success of the NRP that it is fully integrated into all ministerial portfolios and budgets and public bodies need to be made jointly responsible for the recovery of nature. Whilst the NERC Act 2006 does put this onus on public bodies the wording is ambiguous and it is rarely, if ever, enforced so budgets too often do not take account of the purpose of biodiversity conservation.

The sharing of budgets and integration of outcomes needs to happen at a high level. One important aspect of this is to ensure that recognition is given to Green Infrastructure and that it is embedded into strategic decision making at an all Wales level.

## **9. What else should be done to avoid duplication and to deliver our goals?**

Preparation of Conservation Plans used by multiple sectors. One plan with multiple users would avoid duplication and ensure everyone was working to the same end.

## **10. How can we best use the Information Hub to collate and disseminate data and evidence?**

The role of Local Records Centres is absolutely key and we strongly advocate that the LRCs should run/be the Information Hub themselves. They have the knowledge and skills to hold a wide variety of data (not just species records as is often misconceived) and interpret these data into a variety of useful forms, making data increasingly available online. LRCs have continued and increasing support from wildlife recorders, local groups and organisations, allowing access to the best quality, most up to date, data to local decision makers. Our LRC (Cofnod) holds over 1.7 million species records.

The LRCs need to be funded directly by WG to ensure their survival and to allow their data to be integrated into a whole range of local and national government processes. A large part of the current funding structure relies on Service Level Agreements with Local Authorities, some of whom have never been able to establish an SLA (i.e. Wrexham) and therefore benefit from the data available from Cofnod. In addition, some LAs are now withdrawing this funding as a result of budget cuts to local government (e.g. Denbighshire). This is putting the future of the LRCs in jeopardy. We would favour direct funding to retain the four Welsh LRCs.

The work undertaken by LRCs is invaluable; Cofnod undertakes significant development work to continually improve the data and interpretation provided such as the online Planning List Screening service for planning applications, Wildlife Site (also known as SINC) reviews, LDP housing allocation assessments, Green Infrastructures projects, and acts as a receptor for species monitoring programme data ensuring data is accessible and useful. More generally, LRCs provide data to a range of bodies and individuals, allowing decisions to be based on the best available information.

As part of the Information Hub, a further development could be data modelling work to determine the current and target status of habitats and species in Wales. Initial work for this has been undertaken by the LRCs,

including modelling of great crested newt populations in NE Wales and they can provide a useful reference for this work if it is taken forward.

The Information Hub should address issues with data input to multiple systems and data integration, so that duplication of effort is reduced. Currently, as an example, the results of a dormouse survey may need to be separately inputted to the following:

- (i) BARS to report on the activity
- (ii) NRW (for licence reporting)
- (iii) LRC for the record from a regional perspective
- (iv) National recording scheme to ensure data goes on the NBN

Further data entries may be required if the species is listed as an 'SSSI Feature.

**11. How best should we communicate progress with delivery of our ambition, for example, by a three or five year work programme or an annual delivery plan?**

We feel that an annual delivery plan would be too short-term; we would favour a rolling programme with annual reporting. There should be a duty for LAs and public bodies to report on their achievements, e.g. the SMART targets. Reporting should be based on outcomes not outputs. Underpinning surveillance will be required.

**12. We have asked a number of specific questions. Please let us know if you think there are related issues which we have not specifically addressed, and provide further information.**

No information is provided regarding the format of the NRP, which will be absolutely vital. Will we have the opportunity to comment on it?

Agricultural subsidies often have extremely damaging consequences to wildlife, whilst grants given to farmers to mitigate such harm are inadequate. Without addressing this, the NRP cannot succeed.

We feel that there is a lack of recognition within WG of the positive things achieved through LBAP partnerships. At the same time, LBAPs cannot

be relied upon as they have been previously, to deliver an unrealistic workload, without sufficient resources, particularly those things outside local control. The work LBAPs excel at is engaging and enabling people, especially communities and project work at a local level.

The retention of ecological expertise with Local Authorities is vital in achieving success in reducing biodiversity loss. Currently LAs are losing biodiversity staff as a result of budget cuts; the availability of ecological expertise and capacity is already recognised as an issue . There is a need for the roles of both the Biodiversity Officer (proactive and enabling positive conservation work) and Ecologist (regulatory) within LAs.

Biodiversity conservation needs to be statutory. This could be achieved through strengthening existing links between biodiversity and Conservation Status. In addition the duty under Section 40 of the Natural Environment and Rural Communities Act 2006 needs to be strengthened. It is currently weak and not delivering what was intended. We suggest that public bodies are required to report on all their policies and actions. LAs should be required to demonstrate compliance across all areas of work, not just through meetings with the Biodiversity Champion and biodiversity / ecology staff.

We felt that the use of 'Nature Action Zones' for the Nature Fund set a dangerous precedent in leaving out many ecologically important areas of Wales. Spatial plans and other work we have identified should apply across Wales, for the benefit of all areas. The example of work undertaken by EA / NRW to address the Water Framework Directive is positive.

The provisions of the NERC Act (2006) include the selection of habitats and species considered to be of "principal importance for the purpose of conserving biodiversity" . If these are "principal", how does WG and its agencies consider these as part of their statutory advisory functions? Furthermore, we would be grateful for confirmation as to what constitutes implementation of "reasonably practicable [actions] to further the conservation of the living organisms and types of habitat included in the published list" .

On page ii we trust that the use of the word 'society' is in the broadest

possible sense, not just the general public, which could be very dangerous: “identify priority species or habitat that society wishes specifically to see benefit from improvements to our ecosystems”.

**Ref. 0063 - Biodiversity Officers of North Wales LA's**

This is a joint response from the Biodiversity Officers of:

Isle of Anglesey County Council – Simon Rovea-Franco

Gwynedd County Council – Adam Daniel

Snowdonia National Park Authority – Gethin Davies

Conwy County Borough Council – Anne Butler

Denbighshire County Council – Lizzy Webster

Flintshire County Council – Sarah Slater

Wrexham – no Biodiversity Officer

We fully support the response submitted by the North East Wales Biodiversity Network, which is above at Ref. 0062

**Ref. 0065 - Elan Valley Trust**

This is the Elan Valley Trusts response to the WG Consultation : "Nature Recovery Plan for Wales".

The Elan Valley Trust manages nearly 50,000 acres in Mid Wales, mainly through a 999 year lease from Dwr Cymru Welsh Water. Charitable objectives of the Trust include promoting nature conservation and recreation/access on the Estate. Large areas of the Estate are designated under European and domestic legislation and we manage one of the most isolated NNR's in Wales.

**Consultation Responses**

**Question 1**

Ecosystem resilience is critical to ensuring that the ecosystem services society derives from Trust land are to be maintained. However, the Trust would like to see such benefits optimised rather than simply "identified"

and "captured" and has concerns that for nature to recover on the Estate, as in the rest of Wales, greater ambition and clarity of purpose is needed. In addition, many of the benefits of individual species are by themselves intangible and so considerable creativity and new ways of thinking are needed to ensure that these species flourish.

## **Question 2**

The ambition statement relies heavily on the assumption that the Natural Resource Management (NRM) Plan will deliver for nature. NRM is currently poorly defined in the document and the approach risks falling into the trap of focusing too heavily on the regulatory and designatory approaches that have failed us in the past. In espousing the benefits of designation the consultation fails to recognise that experience on the Estate, and more widely across Wales, suggests that designation at best acts as a fallback or safety net for nature, and at worst fails to secure nature in the state it was, even at the time of designation and of course has little or no impact on nature in the wider environment. The consultation should more honestly reflect this because it is largely for this reason that many of the actions suggested in the document are so important, particularly those that focus on the integration of nature into the economic and social context of modern Wales.

## **Question 3**

The goals set out in the consultation are largely about achieving nature conservation targets in a classical sense. With greater clarity of purpose in the ambition statement, goals that reflected the key role of the economic and social context would have been included.

Ultimately, goals such as ensuring business understands the benefits it derives from nature or promoting the health and well being benefits of nature for people would be more effective in achieving the recovery of nature.

## **Question 4**

Again the proposed actions would be better aligned to actually achieving recovery of nature if there was greater clarity of purpose. This said, there are some positive components such as the need to develop financial

instruments that can be used to economically incentive nature-friendly management. In areas such as the Elan Valley Estate where HNV farming systems still predominate and a range of key ecosystems services are currently being delivered at minimal cost it will be crucial to develop PES mechanisms that ensure the continued delivery of these ES rather than reinstating them following their loss.

### **Question 5**

Integrated rural development approaches that recognise the importance of nature to the rural economy, and wider society, and promote development opportunities that capitalise on nature should be a powerful tool in ensuring that nature is "built up" to rural areas in the future. For example, members of the Elenydd Landscape Partnership, including the Elan Valley Trust, are developing ways of improving nature based tourism provision in the area, as well as looking for innovative win-wins that improve nature conservation outcomes and develop small rural businesses. The consultation document should recognise the benefits of taking an integrated nature promoting approach to rural development.

### **Question 6**

Needs to develop effective communication strategies whilst incentivising businesses and at the same time minimising bureaucracy and red tape.

### **Question 7**

Need to develop a real culture of partnership working and collaboration in an atmosphere of mutual trust and respect. Over prescription can be counter productive and possibly cause businesses to dis-engage.

I trust that the above points are of help when reviewing the consultation responses.

### **Ref. 0066 - Woodland Strategy Advisory Panel**

General points.

The Ministerial foreword states that the document "focuses on defining the role and priorities for biodiversity action...." We consider the document does not meet these aims with sufficient clarity. In particular it



lacks details in many areas making it difficult for us to respond in anything but very general terms to many of the questions it poses. Other criticisms of the paper are as follows:

- The document overview and page 10 state ‘This consultation is our first step in defining the direction of travel for biodiversity action in Wales...’ We are surprised by this statement as there have been a number of consultations on protecting biodiversity over the past decade and more, and a series of strategies, Action Plans etc. produced. What has been lacking is commitment – both in policy terms and financial backing, to deliver real progress.
- The consultation, like most of its predecessors, is heavy on process and light on how change can be delivered and achieving better outcomes
- The paper is repetitive and it fails to explain what is really meant by key terms e.g. integrated management
- The very limited reference to funding in the document is a real barrier to the potential success of the Plan.
- There is no attempt to cost the plans or to indicate how they will be financed.
- The consultation shows little new or innovative thinking – it is just recycles existing mechanisms

## Questions

Our responses to the questions focus mainly on the implications of the plan for woodlands in Wales. As they account for 14% of Wales’s land area we emphasise that they must be considered as a vital element when implementing the government’s and NRW’s plans for Natural Resource Management.

**Q1. Do you agree with the focus of the ambition on addressing the underlying resilience of our ecosystems and identifying and capturing benefits for society? If not, what else do we need to consider?**

We broadly agree with this ambition.

“Reversing the decline” appears odd as an ambition as it is (hopefully) short term – once biodiversity numbers increase between two assessment periods the ambition has been fulfilled. Are the new species turning up to arrive by natural processes or could it be through re-introduction? If the biodiversity is not stated as being ‘native’ then might this ambition be achieved with new introduction of non-native species? Should the ambition be something which describes the desirable state of biodiversity or functioning of ecosystems?

In response to climate change species will be lost and replaced by new ones as environmental conditions change – this is natural adaptation and is inevitable. How should the ambition relate to this process? A pygmy sperm whale was stranded on Newborough Beach last week – does this contribute to ‘reversing the decline in biodiversity’?

**Q2. Does the ambition statement capture this new approach fully? What might be added?**

The primary focus should be on reversing the decline in biodiversity. If we have a healthy and resilient natural environment society will benefit and vice versa. We need to facilitate the recovery of natural ecosystems not only for those benefits we can envisage today, but also for their intrinsic value in the long term.

The emphasis on ‘lasting benefits to society...’ should explicitly also refer to the EU Biodiversity Strategy (2011) (see Page 15) which talks about the inherent value of biodiversity. The role of stewardship of the natural environment is being increasingly ignored.

The “resilience of ecosystems” or ecosystem function is perhaps something that could be brought to the fore as they drive the effectiveness or efficiency of adaptation processes rather than focussing on the actual species present in a particular location which may well need to change

Ideas expressed about resilience are good and should perhaps feature more strongly in the ambition statement.

Phrase (page 8) “integrated approach to the sustainable management of natural resources by building the resilience of our natural resources”

seems odd – isn't the resilience of NR the consequence of sustainable management? Which approaches are being integrated?

Much reference is made to CBD but not to the principles underpinning sustainable management: the precautionary principle and adaptive management. Notwithstanding academic semantic debate about these they remain fundamental principles which require explicit attention to achieve. Closing the loop from monitoring to new prescriptions (changed actions) is often where the application of these principles fails. It would be good to have an explicit mechanism for new evidence to influence actions.

Within this primary focus some members believe the ambition needs to mention explicitly biodiversity's social and economic benefits. We suggest insertion of these words in the statement.

### **Q3. Are our goals the right ones? What might be added?**

Goal 1. To improve degraded habitats at scale.

We consider that the goal should be to 'improve degraded habitats on an appropriate scale'. 'Landscape scale' has become a popular approach – but isn't always very clear what it means. In terms of habitats and species it is easier to determine what might be appropriate – for plants and invertebrates small-scale and localised action may make a big difference, for native woodland habitat large-scale connectivity may be important (ie the woodland habitat network approach).

We find the blanket assertion 'We have a large extent of degraded or less diverse habitats' far too simplistic. It must not be applied *carte blanche* to all woodlands as many are biodiversity rich.

This goal also needs to recognise that some habitats are degraded in terms of biodiversity because they are managed for other purposes e.g. agriculture or timber production. The focus should be on maximising opportunities for biodiversity within the constraints set by the provision of products and services from the land. Much intensive agriculture is 'degraded' woodland... we should therefore improve these by encouraging more trees but this should obviously not mean significant reduction in agricultural productivity.

Some members consider this ambition poses WG with a dilemma: on the one hand WG espouses to support the forest industries while on the other hand this goal may well lead to the loss of large areas of planted coniferous forest. This would only add to the woes of the low planting rates currently observed. It is vital that forest managers are fully engaged in all plans which might affect these areas. In view of the current losses in coniferous plantation areas (e.g. deep peat areas / PAWS areas) there is a case for ring fencing existing plantations and concentrating environmental “improvements” on non-forest areas. In practical terms reclaiming ex forestry land is takes time and the biodiversity result is never the same.

Goal 2 To address key negative factors of biodiversity loss and increase connectivity significantly

The goal of increasing connectivity could affect woodlands, and again it will be vital to involve forest managers in any plans which affect their woodlands.

How will reversing the trend improve the ability of people to adapt to change?

This goal addresses... and the EUBS objective of ‘Reducing the impact of Invasive Alien Species on biodiversity’.

We welcome this if it effectively tackles the threats to our woodlands from grey squirrels, deer and tree diseases. However these often rely on connectivity to spread. Isolation of habitats can be an important protection from disease and non-natives. Reducing pollution is necessary but only some forms (water borne) move through networks. Others are airborne e.g. acidification and are more pervasive. Should the wording of the goal reflect its significance?

The Aichi target referenced in the goal includes ‘genetic diversity of wild and cultivated species’ – these are good points which need to be addressed in the nature recovery plan. There are many commitments to the use of ‘local provenance trees’ in planting schemes but of late the implementation of these appear to have been relaxed in favour of selecting non-local provenance and alterative species in the name of ‘climate change adaptation’. However, directing adaptation to model

predictions is perhaps counter to facilitating natural adaptation processes which suggests maintenance of the full range of genetic variation at local scales. There has been little work done to describe the range of climate tolerance inherent in local provenances and so there is little evidence for the assertion that they are unable to adapt and importation of non-local provenances is required.

Goal 3. To improve management of our highest quality environments

No comment

Goal 4. To achieve 'no net loss' of biodiversity

'No net loss' needs to be applied carefully – the habitat banking approach where a new woodland is created to replace native or ancient woodland lost to development is not appropriate. Mitigation schemes rarely replace that which has been lost with similar species or community assemblages. They may add some beneficial biodiversity, but developers' claims that they compensate for the losses incurred are rarely supportable.

Ensuring agriculture and forestry contribute to maintaining and enhancing biodiversity

We should be careful we do not close our minds to the possibility of improving on current practice. Foresters should not mimic those in the farming community who unequivocally espouse the view that they are "guardians of the countryside" when there are numerous examples of standard practices demonstrably harmful to biodiversity.

We are concerned that this goal could lead to further control/regulations affecting private forestry. There should be a presumption that woodlands managed to the UKFS/ UKWAS are maintaining and enhancing biodiversity and that additional regulations are unnecessary.

Goal 5. To put in place a framework of governance to support delivery, working together across sectors and strengthening our collective evidence base.

This will only be successful if there is the financial support and commitment across the board (Welsh Government and other public bodies and business) to achieve real improvements. It is not just costs of

action, but financial implications to not realising plans which would have a negative environmental impact. There is a reference to ‘refreshing local biodiversity action and the response of public authorities.’ Local authorities are central to this but are under significant financial pressure at present. Local biodiversity plans probably aren’t going to be their highest priority.

It is vital that private forestry is represented on the governance structure.

Careful thought is needed when talking of ‘governance’. Is this governance of the plan, actions or nature itself? In all cases CBD requires that plan should be participatory which means involving local people and stakeholders... but there are many levels at which this can take place c.f. Arnstein’s ladder of citizen participation. As can be seen below consultation as represented by the present exercise is only half way up the ladder. Partnership as suggested in the consultation document is a couple of steps up. Is WG prepared to go further and delegate powers or permit citizen control?

Citizen science is an important component of participation – there is already quite a lot of work on this through the Local Records Centres though traditionally this is very species focussed it has recently been expanded by the OPAL project. OPAL covers Wales and most materials are available in Welsh but there has been little uptake across Wales though it is early days yet. <http://www.opalexplorenature.org/> This is also true of many of the UK citizen science biodiversity records e.g. the RSPB Big Garden Bird Watch.

#### **Q4. Are the actions proposed right and adequate?**

The big question is whether there will be sufficient funding – for example evidence and research and surveillance and monitoring are necessary, but very costly.

The second barrier is getting buy-in across the board – from Government Departments (including economic development) to individual farmers and landowners. The document does not include any analysis of why we haven’t succeeded so far which is clearly crucial to turning things around. As noted above, there have been Biodiversity Action Plans in place for many years – why have we not yet seen significant benefits?

The proposal to 'review designated sites and species' actually refers to a commitment to 'review and strengthen the approach to site management plans..' Are current plans achieving necessary management, and if not, why not? Again, process is put before implementation.

'Providing better governance' lists a number of bullet points – the existing Wales Biodiversity Partnership is already charged with delivering the outputs listed in the second set of points so it isn't clear what the proposed review will do.

#### **Q5. What additional action would you wish to see?**

To follow on from the comment above, what are the barriers to reversing biodiversity loss? We have evidence from the State of Nature Report and other sources, including the Wales Biodiversity Partnership. Will the proposed area reports that NRW is tasked with producing be able to pinpoint effective measures? The whole Natural Resource Policy / Management process is being written into legislation before firm delivery plans have been developed. The reports could become a largely administrative process and will not have the ability to influence change. There is danger in relying on NRW's statutory plans to deliver improvement. One member cited his first-hand experience of such plans becoming administrative tools rather than templates for effective action.

We stress that setting priorities & goals isn't enough, there needs to be a feedback process to see why goals aren't reached and then to take further steps to address barriers. Priorities and goals are not in themselves outcomes. We feel that the document does not adequately address achieving desired outcomes. The focus is primarily on process.

The plans are all very top-down and barely mention engaging with local communities and their aspirations for their local environment and biodiversity in the formulation of the plans – rather than as receptors for 'communication and engagement'. Communities can achieve a lot in their local area if properly supported and allowed to develop their own action plans. Too much of the use of volunteers is geared around one-off or activities organised by third parties e.g. litter picks for scouts etc. This is valuable but there are other ways of involving communities a bit higher up Arnstein's ladder. An example might be getting a local gardening group to

promote remove potentially invasive garden plants e.g. Spanish bluebell, another might be for a community to take over management of a native woodland or waterway. When a community gets involved in management they often place biodiversity high on their list of priorities and seek to improve the habitat and enhance diversity (e.g. community woodland groups who manage conifer plantations all seek to diversify tree species and promote biodiversity). As recognised in the document - small amounts of funding to support small, local level actions can achieve a lot – but to be most effective the actions need to be initiated and owned by the communities (or groups of local actors) themselves.

### **Q6. How do we engage with business more effectively to deliver our ambition?**

Effective engagement with forest businesses will be crucial in implementing plans. Key bodies include CONFOR, Woodland Trust, Coed Cymru, CLA and WSAP

Effective engagement with social enterprises also has the potential to foster environmental improvements especially community energy schemes.

### **Q7. How can we strengthen the way we work together?**

By engaging effectively with major rural landowners, managers and users.

By exploring local aspirations for biodiversity and incorporating these into the plans. See reference to points above regarding governance and participation.

### **Q8. How can we share budgets and look at integrated outcomes?**

Who is expected to share budgets with whom? This sounds like WG talking to the local authorities/agencies.

The review of grant funding models could obviously affect woodland grants. The forestry sector needs to be closely involved in any discussions affecting woodlands.

The document has limited reference to funding, but the section on



'funding our partners' talks about the review of grant funding, but financial support for achieving a reduction in biodiversity decline will have to be much more fundamental.

What does "integrating nature outcomes" mean?

**Q9. What else should be done to avoid duplication and to deliver our goals?**

The paper makes no explicit reference to duplication of goals but this is clearly a serious risk given the multiplicity of agencies involved. Your goals need to be carefully reviewed following responses to this consultation.

**Q10. How can we best use the Information Hub to collate and disseminate data and evidence?**

We presume the hub referred to is the Wales Environment Research Hub <http://www.werh.org/> If this is correct we suggest that the board needs representation from the private sector and relevant NGOs and that the web site is brought up to date. If this is not the hub referred to what hub is it?

**Q11. How best should we communicate progress with delivery of our ambition, for example, by a three or five year work programme or an annual delivery plan?**

A five year work programme would fit with the 5 year Woodlands for Wales Action plan. Under this we advocate an annual operations plan. These must be in the public domain.

There is a need to build in reflection on processes and monitoring of impact but the long time lags in forestry means that results may take some time to become apparent.

**Q12 We have asked a number of specific questions. Please let us know if you think there are related issues which we have not specifically addressed, and provide further information.**

We wish to add the following points:

Page 17 para 4. NRW has already been established.... The Environment

Bill will also introduce a requirement for NRW to publish area statements,.... Decision-making will be informed by the overall resilience of an area and the multiple benefits and opportunities available by looking across policies and issues at a wider scale, and in a way that optimises social, economic and environmental benefits.

What does this mean in practice? How will this be done? These questions have been raised many times before but we seem no nearer to any answers.

Page 17 Para 5 The framework established by both the Environment Bill and the Well-being of Future Generations (Wales) Bill can help public bodies to seek opportunities to collaborate on increasing the resilience of our ecosystems for example by making the enhancement of nature a core element of local well-being plans.

What are local well- being plans? Will they affect local woodland management over and above existing controls?

Page 21 Monitoring and reviewing regulatory instruments

The Environment Bill will provide NRW with opportunities to take a more integrated approach to how they deliver their operational activities ....

Yet again the “integrated approach” What does this mean for the WGWE in practice?

In the light of experience with the new legislative framework and proposals for fresh EU legislation, such as that related to the control of Invasive Non-Native Species...

We welcome measures to control non-native species harmful to woodlands, particularly grey squirrels and tree diseases.

Page 21. Improving the Evidence base: Research, Monitoring and Surveillance

The Environment Bill places a requirement on Natural Resources Wales to produce a State of Natural Resources Report (SoNaRR). As part of developing the Report, NRW could, for example, review the need for different or additional monitoring of species, habitats and wider

ecosystem function in order to inform actions and track progress. This could also include testing and monitoring of fundamental aspects of ecosystem functioning such as soil condition which are not currently undertaken.

Members representing private woodland owners are concerned this could lead to further demands and increased expenditure in providing information on their woodlands. This must be avoided.

## **Ref. 0067 - Newport City Council**

### Consultation Questions

**1. Do you agree with the focus of the ambition on addressing the underlying resilience of our ecosystems and identifying and capturing benefits for society? If not, what else do we need to consider?**

Do not necessarily agree with the phrase “reverse the decline in biodiversity”. The main focus of the ambition should be to stop the decline in biodiversity then reverse it.

Agree that building resilience is an important element in preventing further biodiversity loss and that managing resources to allow them to without negative pressures is fundamental for society as well as the economy.

**2. Does the ambition statement capture this new approach fully? What might be added?**

Yes, see question 1.

**3. Are our goals the right ones? What might be added?**

Agree with the goals in principle however there are several points to make regarding each goal:

- Improving degraded habitats at scale-this could prove problematic as there are external elements to consider e.g. landowner issues, financial implications. These habitats are often fragmented therefore restoring at scale may not be realistic;

- Agree with improving connectivity. However the trend of fragmentation, degradation and habitat loss needs to stop before it can be reversed;
- Improving the management of highest quality environments-agree that these habitats need to be connected to surrounding habitats on a wider scale and the management needs to be consistent. Sometimes these highest quality habitats e.g. SACs/SPA's/RAMSAR/SSSI are viewed/managed in isolation to other priority habitats such as SINC's and those found in the Local Biodiversity Action plans. The role of the Local Biodiversity Partnerships does allow for collaboration between NRW and other organisations on specific projects/management;
- Agree that there should be a 'no net loss' in biodiversity and this should be a core message.

#### **4. Are the actions proposed right and adequate?**

Agree with the actions proposed in principle but have the following points to make:

- Facilitating Cross-Sector policy integration-agree that this is imperative to ensure that biodiversity duties under the NERC act are adhered to. This will need to infiltrate down from WG policies to LA's to ensure that the message is understood at all levels;
- Agree and support the use of Payments for Ecosystem services (PES) however cautious with regards to implementation and how this would translate at a local scale. More training would need to be provided to LA's with regards to this;
- Fully agree that evidence base, research, monitoring and surveillance are required in order to ascertain the current state of ecosystems. However uncertain as to how this will be achieved-who will undertake the work;
- Agree that refreshing the role of local biodiversity action and the responsibilities of public bodies in the context of implementing resource management is an important aspect in delivering the goals;
- Do not necessarily agree that 'society' should identify priority

species or habitats. These need to be decided based upon scientific fact and research. Local Biodiversity Partnerships consist of members of the public, experts, county recorders as well as statutory and non-statutory organisations. The lbap groups, along with the Ecology section within the various authorities monitor the Local Biodiversity Action Plan which identifies the priority habitats and species and records the actions that individuals/organisations are doing in order to manage species/habitats.

**5. What additional action would you wish to see?**

Greater financial support for Local Biodiversity Partnerships who will ultimately be delivering the actions.

**6. How do we engage with business more effectively to deliver our ambition?**

This could be implemented via the Local Biodiversity Partnerships. Specific 'flagship' projects are extremely important in raising awareness of particular issues however an ecological theme needs to run throughout businesses as well as organisations.

Financial rewards for 'Going Green' or recognisable awards e.g. Green Flag, need to be promoted and rewarded.

Also putting the onus on the consumer to choose a 'greener' business//organisation, for example rewarding those who purchase/work/support businesses who are working to build the resilience of our ecosystems.

**7. How can we strengthen the way we work together?**

Maintaining the Wales Biodiversity Partnership and ensuring that appropriate organisations are consulted with regards to certain projects and initiatives.

**8. How can we share budgets and look at integrated outcomes?**

Match funding on certain projects with staff time.

**9. What else should be done to avoid duplication and to deliver our goals?**

Ensure that appropriate organisations/individuals are consulted regarding projects and initiatives.

**10. How can we best use the Information Hub to collate and disseminate data and evidence?**

Compulsory training for organisations with regards to data searches and ensuring that there is an appropriate officer in post to provide advice/training regarding species and habitats. Also to interpret data results.

**11. How best should we communicate progress with delivery for our ambition, for example, by a three or five year work programme or an annual delivery plan?**

Dependent upon the type of individual project. Some projects may require a longer timescale to design, implement and monitor.

**Ref. 0068 - Wales Biodiversity Partnership's Lowland Grassland and Heathland Ecosystem Group**

Key Messages

- The plan does not explicitly address the State of Nature Report e.g. the decline in species and habitats.
- The document is not a plan but a high level strategy.
- There are no clear targets, outcomes or mechanisms within the plan.
- The ambition is reasonable but in places it is not as strong as the existing Wales Environment Strategy. Outcome 21.
- There is limited reference to agriculture, agricultural policy and agricultural support.
- The NRP needs to reference and recognise that many approaches have worked despite inadequate funding; for example protected sites series (e.g. SSSIs critical for grasslands), species recovery plans and large scale habitat restoration projects e.g. Anglesey Grazing Animals

Project (WREN Biodiversity Action Fund), HLF Landscape Partnerships e.g. Llyn partnership, HLF Tomorrows Heathland Heritage in Pembrokeshire and Gower, REF and ERD Fund projects.

- The NRP must address drivers of biodiversity loss across all sectors.
- The plan should recognise the links between the loss of biodiversity and the damage, disruption and loss of ecosystem function, hence services and the long-term impact this has on human wellbeing.

## **Consultation Questions**

### **1. Do you agree with the focus of the ambition on addressing the underlying resilience of our ecosystems and identifying and capturing benefits for society? If not, what else do we need to consider?**

The group is concerned that the document is too broad and lacks focussed targets, timescales and outcomes. The document reads as a broad strategy rather than a plan. The ambition is broadly acceptable but the document is less ambitious than the existing Environment Strategy in some targets e.g. Outcome 21. The ambition requires a time frame for delivery and targets to make it truly meaningful.

Whilst it is accepted that Natural Resource Management will address some of the issues impacting on Biodiversity it will not address all the complex pressures and processes of the natural world and it is therefore essential that targeted conservation action for habitats and species continues. The document fails to recognise the successful mechanisms which are currently delivering biodiversity conservation.

In addition to truly deliver for nature, there must be recognition of nature intrinsic value, not just societal value.

### **2. Does the ambition statement capture this new approach fully? What might be added?**

The ambition should be expanded to cover promoting the understanding of biodiversity, habitats, species and the ecosystem approach. The document fails to recognise that public support is essential to deliver the

Nature Recovery Plan and that without improved understanding and public engagement this will not happen.

The ambition statement should outline how it will draw up a plan (including targets) and establish a framework to enable recovery – this would provide a much stronger message.

### **3. Are our goals the right ones? What might be added?**

The goals are acceptable in principle but require strengthening through the inclusion of specific targets, milestones, and outcomes. Without these there is no clear mechanism through which organisations, partnerships and individuals can support and engage with the process.

The WBP structure provides a framework for engagement.

Additional goals should cover public understanding, engagement and participation; providing a pathway for enthusing and involving the public in the natural environment.

See below for specific comments on each goal:

- Goal 1 - To improve degraded habitats at scale

This Goal should address both short term plans such as the Strategic Plan 2020 as well as encompass the longer term goals.

To 'improve' needs to cover restoration, enhancement and maintenance, and should include both habitats and species populations.

The scale at which this goal is applied needs to be appropriate for the nature of Wales, to ensure it addresses the needs of the intimate mix and complex nature of our smaller scale landscapes. Some of our precious jewels occur at very small scale but are still an important part of the fabric of our natural environment and they need to be fully recognised in the plan. For example species-rich grasslands are now highly fragmented and sites are typically small and highly vulnerable to change. These sites are important for a range of plant species, some very rare and the pollinator communities they support. In relation to these highly fragmented habitats the plan needs to think in terms of the Lawton Report's call for a "bigger, better and more connected" approach.



Improving at scale therefore will need to include expansion of fragmented habitats and improving the underlying biodiversity value of the agriculturally improved landscape within which they sit in order to improve connectivity.

- Goal 2 - To address key negative factors of biodiversity loss and increase connectivity significantly

This goal should highlight that the value of nature needs to be recognised in all decision making, and applied across all sectors of local and national government. Strengthening the wording of the NERC duty would be beneficial to achieving this goal.

The NRP needs to recognise and quantify the impacts of key negative drivers and provide timescales for addressing these and reversing their impact on biodiversity.

There is very little reference to agriculture in the document although agricultural policies and in-effective elements of agri-environment schemes are a major cause of change in the terrestrial environment. The plan should identify mechanisms for addressing these drivers example, more targeted outcome based agri-environment schemes developed such as the very successful Burren Life Project in the Republic of Ireland.

To 'increase connectivity significantly' is welcomed, but although we have understanding of the principles of connectivity, there is little on the ground experience or mechanisms for implementation. Again targets, outcomes and processes for implementation need to be identified.

- Goal 3 - To improve management of our highest quality environments

We are pleased to see Welsh Government's recognition of ancient and complex environments.

However the term 'highest quality environments' is non-standard and requires defining to ensure its meaning is clearly understood. If in part the term refers to specific site designations such as the SSSI series or non-statutory Wildlife Sites this should be should be clearly stated.

Restoration of "high quality environments" should be in partnership with

enhancing our extensive more modified ecosystems in order to improve connectivity and take a truly landscape scale approach. For a range of ecosystem services the whole landscape must be enhanced not just the high quality areas of that landscape.

As covered in Goal 2 recognition should be given to those high quality sites that are isolated in highly modified land e.g. species-rich grasslands and ancient parklands.

- Goal 4 - To achieve 'no net loss' of biodiversity

The best way to achieve this goal is undoubtedly to maintain existing habitats and species populations' in-situ.

Much of our environment is complex and ancient and as such can not be replicated or translocated. The link of a priority habitat to its past cannot be re-created in the short or medium term and it is this link and its manifestation in the species it supports that make our existing habitats so valuable. Translocations should not be seen as a way to offset loss as it does not take into account the context and fabric of the environment and severs the ecological continuity of precious places. Habitat re-creation and translocation should be seen as the last resort and used with extreme care. Where habitat re-creation or translocation becomes necessary it should be on a like for like basis, not replacing one habitat with another. It should also be recognised that not all habitats can be re-created easily; particularly those which have complex hydrological or edaphic requirements and very ancient habitats, every effort should be made to protect these in-situ.

The target is rather unambitious; we need to see a 'net gain' of biodiversity. A fully resourced mechanism is needed to monitor and record loss of biodiversity.

- Goal 5 - To put in place a framework of governance to support delivery, working together across sectors and strengthening our collective evidence base.

This framework should be well resourced and incorporate other sectors such as agriculture, forestry, industry etc.

It is important to continue to support the Wales Biodiversity Partnership, its support team and the WBP Ecosystem and Species Groups as a good mechanism to deliver parts of the plan.

#### **4. Are the actions proposed right and adequate?**

In principle the actions are welcomed although they appear to exclude the need to continue to support successful existing conservation mechanisms. These actions will only be effective if targets, outcomes milestones and mechanisms are identified.

See below for specific comments on each action.

- Putting in place effective natural resource management

There is no reference to how this approach will deliver for species and habitats only an assumption that natural resource management will deliver for all aspects of the natural environment. Undoubtedly specific conservation action for species and habitats will still be required and should be included within these actions.

There needs to be a mechanism to ensure that natural resource plans do actively deliver for biodiversity, and that this is monitored and reported.

Protected sites such as the SSSI series are central to resource management as they provide reservoirs of rich biodiversity and are the building blocks of a healthy natural environment and should be recognised as such within the natural resource plans.

- Delivering a Welsh National Marine Plan

Not applicable to the group.

- Facilitating cross-sector policy integration

We see this as a critical, as it is the influence of decisions made in other sectors such as agriculture or industry that have the greatest impact on biodiversity.

Welsh Government should look at how they can deliver this approach across all of their remit and all sectors e.g. they should lead by example. A possible starting place would be a biodiversity audit across

departments and a strategy to enhance Welsh government owned land.

There is a need to strengthen the NERC duty wording to include enhancement and to ensure more consideration is given to S42 species and habitats.

Sustainable development policy needs to take into account the cumulative and wider impacts of development on biodiversity and take a more strategic approach. For example the push for hydroelectric schemes has not been coordinated and therefore a strategic approach to protecting key biodiversity has not been possible. If natural resource planning is to work for biodiversity it is essential that the impacts of major policy drivers are assessed strategically not on a case by case basis

- Funding our partners

Funding should be tied into specific targets and milestones related to meeting the 2020 targets and to the longer-term goals of the NRP.

Long-term funding is required to address issues in the State of Nature Report. NRP should look towards existing successful partnerships (e.g. Llyn Landscape partnership): support these and further use these as a blueprint for other partnerships. It is also important to draw on the strengths and lessons learnt from the Nature Fund and REF funding.

To make the most efficient use of funds such as the Nature Fund there needs to be coordination and integration. As a starting point each of the Wales Nature Recovery Zones needs dedicated staff to draw partners together, to seek project funding and secure long term sustainability of initiatives.

The REF (and formerly ERD) funding mechanism was a notable success with positive outcomes from projects such as the SE Wales Local Wildlife Sites Pilot Project, DNA Waxcap Project, NT Cotoneaster control on South Gower Coast, etc. but funding for short term projects is not ideal and give insufficient time to ensure sustainability of the projects. There is a need to recognise the successes of these projects and support their continuation and potential expansion; for example the outcomes of the SE Wales LWS Pilot highlight the value of developing the system across Wales but funding, Wales-wide co-ordination and implementation is

required.

- Identifying financial instruments

There is a need for a more coordinated approach to European Funding LIFE, Interreg etc. Wales could draw-down far more European money if capacity was available to develop better-informed strategic bids.

The RDP offers a mechanism for better funding of biodiversity initiatives in the rural environment e.g. targeted habitat restoration schemes.

- Reviewing designated sites and species

This action requires definition on what is meant by a review. It may be welcomed if it leads, for example, to the designation of more vulnerable grassland sites, increased connectivity, systematic monitoring or better funding for management on designated sites. However if the SSSIs series and their protection mechanism is diluted as a result of this review this action would contradict the goal of 'no net loss of biodiversity and would undoubtedly lead to a continuing decline in biodiversity. SSSI designation remains essential for grassland conservation despite agri-environment and EIA regulations. Work carried out by the former Countryside Council for Wales showed clear significant loss and damage to non-designated grasslands compared to minor changes to SSSI grasslands over the same period.

The NRP needs to provide a clear message that the SSSI series is recognised as a huge reservoir of biodiversity and that nature conservation remains at the core of their designation.

The focus solely on N2K sites would result in missing the huge wealth of wider biodiversity protected within the SSSI series. The "bigger better and more connected" approach to designated sites focuses on enhancing the condition of designated sites as the core of the biodiversity resource whilst improving buffering and connectivity within the wider countryside. The approach will allow the complex ecological systems within SSSIs to be the key mechanisms for delivering supporting services whilst enhancing the ability of the wider landscape to deliver other ecosystem services.

- Monitoring and review regulatory instruments

There is a need to review which regulatory instruments have the greatest impact on biodiversity. The review should also look at lessening the impact of other regulation on biodiversity and incorporating the enhancement of biodiversity into other regulations.

WG needs to address how all regulatory instruments incorporate a duty to further sustainability (including the enhancement of biodiversity).

- Improving the evidence base: research, monitoring and surveillance

Ideally this action should result in the development of an Evidence Strategy by Welsh Government, NRW and the NGOs who collect much of the data.

Local Record Centres could and should play a key role in this process. The NRP needs to recognise and support well established and populated sources such as Local Record Centres and BARS.

There needs to be support and a steer for citizen science projects should be provide to make them relevant and verifiable

NRW needs a 're-invigorated' strategy and platform for monitoring all SSSIs as well as N2K sites with their partners.

Partners should be supported to enable them to play a key role in the delivery of monitoring and the reports and results need to be made accessible to all including landowners and land managers.

It is important to also recognise and resource the wider countryside such as long-term monitoring programmes e.g. Pwllpeiran plots, Countryside Survey.

The WBP Evidence Gaps Project has developed strong links with the academic community and needs to be supported. Mechanisms need to found to encourage and support the Universities to deliver the appropriate research to fill the gaps in our knowledge which have been identified through the project.

- Encouraging effective communication and engagement

Encouraging effective communication and engagement is welcomed, but it must be clear what is being communicated, and to whom. This action should also include enthusing the public about the natural environment as this is key to promoting action for the environment

NGOs and Local Biodiversity Partnerships (LBAPS) already provide an effective means of communicating and engaging with the wider public and need to be supported to continue this essential work.

WG and NRW need to ensure that they communicate more effectively about biodiversity issues internally and externally.

- Providing better governance to benefit nature

There should be recognition that the Wales Biodiversity Partnership and the associated LBAPs although not perfect and inadequately funded, are the strongest partnerships of their kind in the UK and need continued support.

The all-Wales groups such as the Ecosystem Groups have provided a welcome focus for discussion, training and action. There is no other mechanism for net working and the provision of expert knowledge in Wales and as such this must be continued and refreshed in the revised structure.

The proposed four main elements are welcomed and would provide a sound basis for the future of ecosystem groups but they need resourcing to be effective.

The proposal to identify priority species or habitat that society wishes specifically to see benefit from improvements to our ecosystems should be based on scientific evidence as well as societal choices. Societal choice needs to be linked to improving public understanding of complex issue such as flooding amelioration, coastal retreat etc.

## **5. What additional action would you wish to see?**

There needs to be an action for focused conservation intervention on the most vulnerable, rare and fragmented habitats and species-populations.

## **6. How do we engage with business more effectively to deliver our**

## **ambition?**

More engagement with business strategically through cross-sector development plans.

WG need to recognise that most businesses in Wales are small to medium sized and effort must be focused on these as well as on the larger and multi-national companies. Many smaller companies in Wales rely on the environment for their business e.g. outdoor providers, agricultural niche markets such as products from conservation land.

There needs to be better WG advice to businesses on environmental issues and incentives to work with NGOs and better recognition of best practice.

## **7. How can we strengthen the way we work together?**

WG should increase support for and engagement with LBAP and other existing successful partnerships e.g. Llyn Partnership.

It is important to provide continued support for an effective WBP, strengthening the Ecosystem and Species Groups to provide effective networking, a Wales-wide steer and a catalyst for implementing the Nature Recovery Plan.

WG/NRW needs to provide resources for coordinators to lead and steer the Nature Zone Areas to provide an integrated approach.

## **8. How can we share budgets and look at integrated outcomes?**

Sharing budgets could be effective through strong partnership but will require coordination and a steer from WG/NRW. At present there is limited capacity to coordinate and integrate projects except where there is a funded partnership with a lead officer e.g. Llŷn partnership. WG or NRW need to look at funding coordinators on an area basis possibly linked initially to the Nature Action Zones.

The competitive bidding approach trialled within NRW and WG is less helpful for integrated delivery as it tends to encourage organisations to work separately on their own agendas rather than working in partnership.

## **9. What else should be done to avoid duplication and to deliver our**



## **goals?**

Assess and invest in a clear and dynamic reporting system, including supporting well established and populated sources such as Local Record Centres and BARS.

WG needs to develop a Plan with realistic targets, outcomes and actions with “buy-in” across sectors so that everyone knows their roles and responsibilities. We need clear accountability for failure to implement the Plan e.g. Welsh Government and NRW.

Better use of LRCs to coordinate aspects of the plan.

## **10. How can we best use the Information Hub to collate and disseminate data and evidence?**

Whilst an information hub is welcomed in principal we need to build on the existing LRCs and NBN for managing biodiversity data. The hub should simply be a mechanism for accessing data from various sources. LRCs should remain the focus for collecting, storing and managing data.

We need to ensure we are targeting resources at the key evidence gaps and continue to support WBP evidence Gaps project which is working with academics from across Wales.

## **11. How best should we communicate progress with delivery of our ambition, for example, by a three or five year work programme or an annual delivery plan?**

- We need proper actions and clear targets and milestones for each goal.
- We need short term (5 year) and long term plans with annual delivery and work programmes.
- Effective recording to highlight successes towards ambitions and goals and also to record failures so we can learn from these.
- Data should be compiled in a format that can be fed into Wales and UK reporting e.g. SoNaRR, Article 17, State of Nature.
- Resourcing communications plans for different audiences e.g.

public, policy makers and scientific community.

**12. We have asked a number of specific questions. Please let us know if you think there are related issues which we have not specifically addressed, and provide further information.**

The NRP does not make the explicit links from biodiversity to ecosystem function to provision of ecosystem services to human wellbeing (including poverty). Without this it is difficult to communicate the need for biodiversity conservation across WG remit and to the wider public.

Welsh Government needs to state clearly that the conservation of biodiversity is fundamental to future human wellbeing and is an integral part of sustainability.

**Ref. 0070 - Sustainable Places Research Institute, Cardiff University**

Consultation Questions

**1. Do you agree with the focus of the ambition on addressing the underlying resilience of our ecosystems and identifying and capturing benefits for society? If not, what else do we need to consider?**

Yes in broad terms, but the international context is lacking here and any goals must be set in line with these – eg the Aichi Targets, and defining exactly what is meant with statements such as ‘no net loss’: this needs more rigour and above all it needs to be measurable.

The National Assembly for Wales Sustainability Committee Report from their Inquiry into the missed 2010 biodiversity targets contains a number of recommendations, and the Welsh Government response are both worth revisiting in light of this consultation and the questions asked.

**2. Does the ambition statement capture this new approach fully? What might be added?**

A clear statement of how this will ambition be monitored and measured must be added, along with the international context.

### **3. Are our goals the right ones? What might be added?**

Again – reference to the current international targets for biodiversity conservation by 2020 (Aichi) must be added.

### **4. Are the actions proposed right and adequate?**

It is difficult to assess when proposed in such general terms – laudable words, but it is lacking the detail at this stage.

### **5. What additional action would you wish to see?**

There is no mention of genetic diversity (Aichi Target 13) Species and ecosystems are measured but we also need to manage our genetic resources and nothing is mentioned about this.

### **6. How do we engage with business more effectively to deliver our ambition?**

No comment

### **7. How can we strengthen the way we work together?**

By resourcing and placing more responsibility with the Wales Biodiversity Partnership and the Wales Environment Hub.

### **8. How can we share budgets and look at integrated outcomes?**

The WBP Evidence Gaps project proposes to use student projects to help with the evidence gaps. This kind of approach will need to be spread if we are to resolve the many issues to do with a lack of evidence confronting us.

### **9. What else should be done to avoid duplication and to deliver our goals?**

See above (WBP and WEH) – we need a clearing-house mechanism.

Support for the WBP Evidence Gaps project as a cost effective mechanism to address key questions in our knowledge, including:

- Addressing biodiversity and ecosystem approach evidence gaps
- Engaging the research community in Wales, and beyond;

- Looking for new approaches and integrating with existing mechanisms,
- Ensuring good provision of evidence and advice to Government, the environment sector and others.

**10. How can we best use the Information Hub to collate and disseminate data and evidence?**

Maintain and develop the website as a portal to access information, along with the WBP website.

**11. How best should we communicate progress with delivery of our ambition, for example, by a three or five year work programme or an annual delivery plan?**

Progress on the ambition should include a commitment to report to the National Assembly for Wales annually, allowing the Assembly to hold the Welsh Government to account in an open and transparent way.

**12. We have asked a number of specific questions. Please let us know if you think there are related issues which we have not specifically addressed, and provide further information.**

Some suggested references on ecological restoration and ecosystem services :

- Baker, S. C. and Eckerberg, K. 2013. A policy analysis perspective on ecological restoration. Ecology and Society 18(2), article number: 17. (10.5751/ES-05476-180217)  
<http://www.ecologyandsociety.org/vol18/iss2/art17/>
- Hails, R S. Hails and Ormerod S J 2013. Ecological science for ecosystem services and the stewardship of Natural Capital.  
<http://onlinelibrary.wiley.com/doi/10.1111/1365-2664.12127/pdf>

**Ref. 0071 - Rhondda Cynon Taf Countryside Section**

**1. Do you agree with the focus of the ambition on addressing the underlying resilience of our ecosystems and identifying and**

## **capturing benefits for society? If not, what else do we need to consider?**

The ambition should consider the intrinsic value of nature, not just the ecosystem service or natural resource uses. The ambition should align with the NERC duty and CBD 2020 targets and include reversing declines and enhancing biodiversity.

The title should reflect the fact that this document is Wales' Biodiversity Strategy (suggest Nature Recovery Plan: the biodiversity strategy for Wales). Clear, understandable and consistently applied definitions are required for the technical terms used in the consultation. This applies specifically to ecosystems, ecosystems resilience, natural resources and natural resource management as well as biodiversity. Communicating scientific information to a lay audience requires greater clarity than in the current consultation.

## **2. Does the ambition statement capture this new approach fully? What might be added?**

It is not clear what the new approach is. The statement is theoretical, describing the ecological principles previously outlined in 'Sustaining a Living Wales'. It talks about 'building resilience' and 'natural resource management' but it is not clear what this will entail. The State of Nature report (2013) clearly articulated the causes of biodiversity decline relevant to various broad habitat types and identifies practical examples to reverse this. It would be useful to include a summary of the Wales Biodiversity Strategy Board's analysis of the drivers of biodiversity loss in Wales and some examples to illustrate how building resilience and natural resource management would address these.

Again clarity of language is required, for example definitions for functional units, ecosystem extent etc. It is not true that diversity of an ecosystem will allow it to adapt to 'whatever disturbance is applied'. If it is bulldozed, diversity is of no assistance to adaptation. Similarly, it is not clear that diversity is especially important for rare species, many of which are rare because they rely on very specific habitat features and species associations.

The plan should support and strengthen designated sites. These sites

are of vital importance as the core reserves and strongholds of biodiversity which the broader habitat networks and ecosystems may be reliant upon. These areas are the only sites that are afforded legal protection from inappropriate use, damage or destruction. Without such protection sites will be lost, together with biodiversity reserves necessary for recovery. However, SSSIs only include representative examples of our important biodiversity resources; they therefore do not protect all of the equally important habitats, species and ecosystems. It is likely that additional site protection will be required if biodiversity loss is to be reversed.

### **3. Are our goals the right ones? What might be added?**

Goal -Restore degraded habitats at scale –

Alternative: To improve the condition of degraded habitats and ecosystems at appropriate scales.

This goal will need to be followed up with quantifiable targets.

In parallel with this goal, it is also important to ensure continuing good management practice for habitats in favourable condition.

Again clarity of language is required. Habitat condition, rather than habitat diversity is the key indicator of status. Identification of the location and extent of degraded habitats is the first requirement. The policy levers to address habitat degradation and habitat restoration will then be required. The scale will be dependent on the implementation mechanisms. Also, note the inconsistency in language should be addressed. Page ii says “restore” and page 14 says “improve”, these are very different.

Lessons should be learnt from parts of Wales where there are extensive areas of habitat in good condition, such as the South Wales Valleys. These areas provide a biodiversity resource for degraded habitats and examples of the mechanisms that have been successfully used by to maintain and improve habitats. Local authorities and Local Biodiversity Action Plan (LBAP) partnerships work with landowners and through the Planning system to protect sites, and improve habitats through practical on-the ground works, mitigation, enhancement and compensation, and

through the provision of local sites such as Local Nature Reserves, Sites of Importance for Nature Conservation (SINCs) and Wildlife Sites.

Landscape scale projects are to be welcomed, in particular where they can provide a long term vision for appropriate habitats or species and inspire collective action by various partners. Implementation will remain dependant on funding, incentives, regulatory regimes, development planning, landowner interest etc.. Individual small sites will continue to be an important component of nature recovery.

Goal - Address key negative factors of biodiversity loss and increase connectivity significantly – We would recommend that this goal is split into two.

Alternative:

To address the key causes of biodiversity loss and

To maintain and significantly increase ecological connectivity.

This should be followed up with quantifiable targets.

With regard to biodiversity loss, this should be the primary goal. The analysis of the drivers of biodiversity loss by the Wales Biodiversity Strategy Board is key. Policy levers to address these drivers need to be identified and implementation mechanisms developed. If the Welsh Government is serious about reversing biodiversity decline, at a minimum, the Welsh Government should not fund activities that cause biodiversity loss. Welsh government does not always recognise the biodiversity implications of their actions. The current priorities for tree planting, often claimed as a biodiversity enhancement, can be a significant threat to other habitats of conservation concern.

The narrative to this goal is disjointed and implies that the key negative factors are eutrophication, other pollutant emissions and invasive species. There is no mention of losses to development, farming practices, marine navigation and forestry which are likely to be more significant drivers of biodiversity loss and can be affected by Welsh Government policy.

Local Authority ecologists play a vital role in ensuring that development

throughout Wales avoids adverse impacts and loss of biodiversity through the planning system. This role is supported by Natural Resources Wales (NRW) for protected sites and species, but only the LA ecologist considers the full range of biodiversity issues and delivers in relation to the S42 list. Planning decisions require the LPA to assess the benefits and impacts of a development. Without LA ecologists to advise on biodiversity matters and negotiate with developers, biodiversity loss would be even more significant. Support for LA ecologists is essential, as they are the last line of defence for the biodiversity resource of Wales.

The Planning Bill was not mentioned in the 'Developing Welsh Policy' section (p13). This is an important omission. Strengthening the commitment to biodiversity in the planning system is one of the policy levers available to Welsh Government to address biodiversity loss.

The commentary refers to Aichi targets, of particular note the 'no net loss' target is missing from those listed in this section.

With regard to ecological connectivity, this goal should follow the degraded habitats goal. Existing connectivity should be recognised and strongly protected, in addition to increasing connectivity where it is lacking. Specialist knowledge should inform the assessment of connectivity as the ecological requirements will vary for different habitats and species. For example, in the past the rhos pasture habitat of the marsh fritillary butterfly has been threatened by proposals to increase woodland connectivity.

Goal – Improve management of our highest quality environments –

Alternative: To maintain and, where necessary, improve the management of our designated sites and increase connectivity to broader habitat networks.

If this goal relates to designated sites, the requirements already set out in existing legislation and targets under previous plans should be fully enforced and resourced.

The commentary discusses connecting high quality areas to improve ecological and wider environmental resilience; this is not reflected in the goal itself. Whilst it is agreed that connecting designated sites would be



beneficial to biodiversity it is not clear how this is to be achieved. Connecting sites will require actions by a number land-uses and landowners. What policy levers could be used to create incentives or regulate activity? How are the priority areas, mentioned on p.15, defined and how does this relate to the connectivity goal above?

Goal – Achieve ‘no net loss’ of biodiversity –

This is a worthy goal and an international policy commitment but it is not likely to be achieved without a step change in the way Welsh Government prioritises biodiversity. Targets and appropriate monitoring systems will be required to track performance against this goal. No net loss of S42 habitats and species (both numbers and extent) would be a very challenging target.

As suggested above, as a minimum, Welsh Government should not fund activities that lead to biodiversity loss. The drivers of biodiversity loss must be specified, the policy levers to address them identified and implementation mechanisms developed. The planning system, environmental regulation, agricultural support etc. are among the available tools.

The target was widely missed in 2010 and it is unclear how deregulation, the loss of skills in NRW and Local authorities and a lack of enforcement of existing duties will achieve improved performance. The NERC duty was established to integrate biodiversity into decision-making within the public sector, but has had limited impact.

On a professional sector level, biodiversity is still seen as a ‘nice to do’ thing that is an add-on to other sectors that are considered more important; especially economic development. There are few comebacks for non-delivery or non-compliance. Biodiversity considerations are still routinely addressed at a late stage of project development and delay is an inevitable consequence. Biodiversity is still seen as a hindrance rather than an asset. At a local level, LA ecologists have been working hard to redress this, but a culture change needs to take place to main-stream biodiversity and this must start with Welsh Government. This goal should be brought in line with the current EU consultation on the EU no net loss initiative.

LBAPs and Local Authorities are already contributing towards this goal. LA ecologists aim for 'no net loss' as part of their advice for planning applications. The final decision may not reflect this due to the weight expected to be given to economic development. It is clear that without LA ecologists the loss of biodiversity to development would be more widespread. LA ecologists are also continually engaging with other sectors; they provide training, provide ecological advice for projects such as infrastructure and regeneration, they prepare protocols for LA staff to follow during operations and they develop new and innovative ways of working to deliver biodiversity gains. In addition, LBAPs and LAs are also delivering enhancement and improvement projects throughout Wales that are realising a gain in biodiversity.

The commentary talks about increasing societal awareness. LBAPs and LAs lead the way in engaging and raising awareness of biodiversity with the wider public; through the provision of events, leaflets, interpretation, improvements of access to sites etc.. Many people in society are aware of nature/biodiversity and do appreciate it and many do try and do something on a local scale to support it; as demonstrated by the LBAPs, wildlife charity membership, turn out for wildlife events, and viewership of nature television programmes. However, awareness of something does not necessarily translate into the scale of targeted action needed to reverse declines. In addition, the significant decline in environmental education in schools (especially outdoor learning) means that few children have the first hand experience of nature that was common twenty years ago. The next generation will have even less knowledge of and less empathy with the natural world. It is suggested that an additional goal is added to address this issue

#### Additional Goal

To raise awareness of biodiversity, its intrinsic value and its value to the people of Wales

Actions under this goal could build on the biodiversity work undertaken by Futerra for the Welsh Government (Branding Biodiversity), and identify interventions across all sectors, including sectors with significant impact on biodiversity (such as housing developers, politicians or farmers) as well as society at large.

Cross-sector policy integration should be addressed under the 'governance' goal below.

Goal – To put in place a framework of governance to support delivery, working together across sectors and strengthening our collective evidence base –

Alternative goals:

To create a governance framework to support delivery and embed biodiversity in all the decisions and actions of all public bodies. And

To appropriately resource the biodiversity sector (finance and staff) And.

To strengthen our collective evidence base

With regard to resources, the biodiversity sector is poorly resourced in comparison to other sectors. The National Museum and Natural Resources Wales have lost valuable expertise, Local Authorities have very few ecological staff and this is reducing due to austerity cuts. The voluntary sector is largely dependent upon external funding for staff and again this is being reduced. Delivery of on the ground action to reverse the trend of biodiversity decline will be reliant upon these bodies. We would suggest that any real change or delivery of large scale conservation action, cannot be achieved without support and resources from Welsh Government.

With regard to the evidence base, LBAPs and LAs have a wealth of locally collected data that would be able to contribute towards the evidence base. The value of field expertise (both professional and amateur) for the collection and verification of the evidence base must be recognised and supported.

#### **4. Are the actions proposed right and adequate?**

Focus for Action – there is no mention of practical delivery of any work on the ground to achieve the recovery of nature or the identified goals. The listed actions are incomplete, the focus for action should also include practical on the ground delivery and specific measures to ensure resources are available to deliver.

As a general principle, actions should relate to the implementation of the goals. This relationship is not clear in the current consultation.

In reference to the Action focussed on monitoring and surveillance c) priority species or habitats that society wishes specifically to see benefit from improvement .. etc. National action to meet international commitments should be based on science rather than societal choice. Local Biodiversity Action Plans provide existing opportunities to identify locally important species and habitats of particular value to local people. At a national level, additional species and habitats, chosen by society, may have merit for awareness raising, encouraging societal action and for promotional purposes. Again actions must be based on sound science and the well founded principles of nature conservation.

Additional detail and clarification is required for the actions, as those currently listed are vague and it is not clear who is expected to deliver what.

Action – Putting in place effective natural resource management – this action appears to be largely dependent upon the National Natural Resource Policy so until the consultation on this is forthcoming it is difficult to comment in detail.

Participation in the Rhondda pilot exercise for natural resource management has provided some pointers with regard to this action.

It is clear that new procedures are required to facilitate joint working between the legacy bodies. It is also clear that each of the legacy bodies (and the different specialists within each of the legacy bodies) have specific knowledge and skills to bring to the process. With regard to integrated natural resource management, it is very important that all of this specialist knowledge is applied and is available to partners. It may be inconvenient if different specialists hold different views about a specific location or action, and NRW may need to take a decision which is not supported by all specialists but it is critically important that all the evidence is provided and the basis for any decision clearly articulated. A parallel can be drawn with the statutory planning system, where all the evidence, including the views of consultees, is presented and this is assessed against policy and other material considerations to establish a

recommendation. This encourages an 'evidence' based approach, transparent procedures and allows all participants to understand and learn from advice and decisions.

The local authority and the LBAP partnership can provide information, knowledge and expertise to inform effective natural resource management. Local authority landholdings can compliment NRW /WG landholdings in the implementation of the pilot projects.

Sufficient time is required to develop and implement projects. The financial year (and late approval of projects) presents particular challenges for the choice of viable projects. It tends to favour tried and tested projects (rather than innovative schemes), schemes suitable for implementation during the winter months and projects with no 'lead in' requirements. Longer funding time frames are required if the pilots are to maximise impact and associated learning.

The relationship between natural resource management and the local development plan is likely to be critical to successful implementation. The development of a Technical Advice Note (TAN) on Green Infrastructure would provide an opportunity to set out how the ecosystem services concept can be integrated into the land use planning system.

Clarity of language is also required in this section. It is not true that the environment is treated 'as an inexhaustible source of raw materials', current policy successfully manages some of these demands. This should be recognised, as it may provide models for action elsewhere. The consultation suggests that decision making with regard to natural resource management will be informed by a number of criteria ('overall resilience', 'multiple benefits available' across policies and 'issues at a wider scale'); it is not clear what this means.

Area Natural Resource Management should be informed by the Nature Recovery Plan/Wales Biodiversity Strategy rather than the other way around. Proposals for targets, monitoring, a risk-based approach to conservation management (?) and a more pro-active approach to conservation management (?) should be set out here. The Area Natural Resource Management Plans can then identify the spatial dimensions and integrate these issues with other natural resource considerations. If

it is to be a requirement for public bodies to implement the Nature Recovery Plan, this must be clearly stated, in the Environment Bill, the Well-being of Future Generations Bill and the Planning Bill/ Planning Policy Wales, and adequately resourced. The statement 'making the enhancement of nature a core element in local well-being plans' does not provide the necessary clarity. Public sector budget cuts combined with the low priority and non statutory nature of much of this work will preclude delivery without this.

Welsh Government and NRW must demonstrate best practice in implementing effective natural resource management on their own estates. The ambiguous and non-committal wording currently used sets a very poor example.

Action – Delivering a Welsh National Marine Plan – No comments

Action – Facilitating Cross-sector policy integration –

Local development plans (LDP) provide specific opportunities to prevent biodiversity loss and promote locally appropriate biodiversity gains and management for biodiversity through the planning system. Welsh Government can support and encourage this or can undermine this by changes to the Planning system. The current proposals (National Plan, strategic plans and LDPs) and the focus on centrally produced natural resource management plans, seem likely to provide less opportunity for local planning authorities to promote nature recovery through the planning system.

It is agreed that the biodiversity duty requires strengthening. The duty also requires enforcement. The current duty has been in place since 2006, it is widely ignored (including examples of welsh government officers claiming that it doesn't apply to them) and no enforcement action has been taken in Wales. This demonstrates a lack of commitment. Again this section requires clarity in the language so that exactly what is proposed is set out unambiguously.

Actions to improve management of public sector land for nature are to be welcomed. However we do not support the planting of wildflowers or trees as a substitute for appropriate management of native flora in Rhondda Cynon Taf. Planting, often in inappropriate locations, displaces

existing biodiversity, damages local genetic adaptation and potentially introduces disease and invasive cultivars. It is also a waste of resources. The antipathy of funding bodies to 'management' or 'maintenance' works is a serious issue for nature recovery.

Policy integration is a laudible objective, but it is not clear how this will be achieved. There are systemic problems which appear difficult to tackle. For example Welsh Government currently funds a huge variety of projects (often across a single financial year) which impact on biodiversity. Because biodiversity is not the purpose of the project and the recipients are not familiar with biodiversity issues, biodiversity is not addressed in the project design and there is pressure for special treatment, to ignore the issues, to shortcut the procedures etc. resulting in biodiversity loss, missed opportunities and an increased antipathy to biodiversity conservation. This could be avoided if all projects were funded to explore the biodiversity issues and address them at the outset as a condition of the funding. Flexibility with timing would also help with seasonal survey or mitigation requirements.

Action – Funding our partners –

Funding streams must be fit for purpose. Procedures should be transparent, provide confidence and accountability but must be simple and cheap to administer (for both the funder and the recipient). Current procedures waste scarce resources and often mean that funding is concentrated in locations, organisations and projects where there is a fund raising resource, rather than where there is a need. Timescales are also important and funding restricted to one financial year (or less) is inefficient, limits the type of work that can be undertaken and prohibits long term and large scale planning (including project development). The former CCW partnership funding to Local Authorities did provide some consistent ring fenced funding to Local Authorities and LBAPs for biodiversity work, but the ambition for a three year rolling programme was never achieved. If funding to Local Authorities for nature recovery is not ring-fenced it could not be protected in the current austerity regime. The sector generally, is grossly under resourced and match-funding may be difficult to find.

It is also not clear who the 'nature organisations' are. Glastir and Local

Authority Partnership Funding streams are not included under this action but play a crucial role.

In relation to RDP funding, the current definition of rural wards omits most of the rural areas of the south Wales valleys due to the configuration of the wards (in excess of 70% of the land is rural but wards tend to run from watershed to watershed with a small densely developed area on the valley floor of each). RDP funding should be available in all rural areas, as Glastir is. Clarification of the 'nature outcomes' anticipated from the RDP would be helpful.

The ambition for the Nature Fund to support collaborative action is welcomed but the actual administration of the fund exemplifies all the problems listed above. Learning from this experience is essential.

#### Action – Identifying financial instruments –

Clarity of wording is required in this section. Action to strengthen the resilience of ecosystems is not likely to be attractive to most investors. Some investors, such as water companies or hydropower developers may have a financial interest in some ecosystem services. The Green Growth proposals are not about investing in ecosystem services, rather they focus on the exploitation of natural resources as a mechanism for attracting growth to Wales. The recent report on the pilot Payment for Ecosystem Services projects suggests these schemes are not straight forward.

Biodiversity offsetting as proposed / applied in England is an inadequate substitute for a properly resourced planning obligations/ Community Infrastructure levy (CIL) alternative which could operate successfully in Wales. Many LPAs have planning policy and supplementary planning guidance which seeks no net loss of biodiversity and where appropriate biodiversity gain and or management for biodiversity through S 106 agreements. This approach can be very successful and could be undermined by a national offsetting scheme. Any new approach must recognise the importance of local biodiversity to local communities as well as national or strategic conservation priorities. It is appreciated that Welsh Government has no direct control of CIL regulations and biodiversity offsetting scheme may be a way to circumvent this.



Action – Review designated sites and species –

Alternative wording: Support designated sites and species.

The statement that designated sites are ‘the jewels in the crown’ is supported and the alternative wording of the action reflects this. As described above, these site and species as very important for nature recovery. Proper investment is needed both in terms of funding and staff resources to ensure that these sites are appropriately protected and are in favourable condition. Review should focus on management planning, including resilience and their role in wider ecosystem function. In addition, existing legislation must be implemented and sites protected and appropriately managed. The review should also consider adding further designated sites to protect the key strongholds for biodiversity upon which nature recovery is reliant.

Action – Monitoring and reviewing regulatory instruments –

The paragraphs do not contain any reference to monitoring, so it is unclear what is intended in this respect.

The review of regulatory instruments may help to stem biodiversity loss but could also contribute to additional biodiversity loss. It is not clear from this action what exactly is proposed. It is suggested that the objective of the review should be explicitly stated and include halting biodiversity loss. We are aware of current regulatory procedures e.g. spreading of sewage sludge on agricultural land, which do not address the impact on biodiversity and potentially breaches EIA regs for uncultivated land. A recent review of landfill regulations has led to reduced liaison with Local Planning Authorities to the detriment of biodiversity.

Action – Improving the Evidence base –

There are no targets or quantifiable goals in this plan, without which it is difficult to comment on programmes of monitoring. The narrative suggests that NRW could take on additional monitoring functions to assess ecosystems. If this is taken forward, it will require additional resources. The narrative fails to mention the Local Records Centres (LRC) which cover the whole of Wales. They hold significant data relevant for research and monitoring. The Centres are independently

funded and it would be prudent for WG to consider how their future can assured.

Information about soil and soil condition would be most helpful, as would Planning Policy (and technical advice) to protect soil function.

It is difficult to comment on the value of using the Nature Fund projects as they have been approved so late in the financial year and the contractual details are still not clear.

Ecological monitoring undertaken for the planning system is currently limited, typically to that required for the LDP. Additional resources and national standards would be required to generate robust national data for example on habitat loss. If this is proposed it should be implemented through the planning monitoring system to ensure consistency across Wales. This data could not substitute for site based data for planning applications regardless of their size. This paragraph suggests a lack of understanding of the European protected species legislation as well as the NERC duty.

It would be helpful if the data provided by planning applicants was routinely supplied to the Local Record Centre and therefore available for future use. This information is technically available for public inspection, unless there are protected species issues that necessitate confidentiality, but there are apparently copyright and intellectual property rights which restrict the LPA's ability to routinely pass this information to the Local Record Centre. If Welsh Government were able to address this issue, this would be most helpful. The adopted RCT Nature Conservation SPG includes a statement that data should be made available by the applicant to the LRC.

This section demonstrates the lack of understanding of the availability of resources, support and information available to LA ecologists to advise the planning system at a local level.

Action – Encouraging effective communication and engagement –

It is disappointing that the work currently undertaken by LBAPS, LAs and the voluntary sector in this regard is not acknowledged. With fewer resources available, this is an area of work that is suffering at a local

level. In the recent round of cuts, the Council's environmental and outdoor education services have been discontinued.

Developing understanding is as important as enthusiasm, together with practical opportunities for experiencing nature, activities to undertake and participate in. Targeting the message to the audience is critical, as is understanding the science behind proposed actions. The current unfortunate vogue for wild flower planting (see above) is a case in point.

Clarification should be provided as to what the information hub is and how it can be accessed. LA's are not aware of, or feeding information to, the hub so there is likely to be a great deal of information missing.

As stated above, the Nature Recovery Plan: a biodiversity strategy for Wales should set out the Welsh Government's position on biodiversity and this should inform both the State of Natural Resources Report and the Future Generations Report, not the other way around.

Action – Providing better Governance to benefit nature –

The narrative discusses the refreshing of the BAP system in Wales. It specifically states that it will 'refresh' the role of local biodiversity action and the responsibilities of public authorities in the context of implementing natural resource management legislation. It does not state what the 'refresh' is aiming to achieve.

There appears to be a lack of understanding of the extent of biodiversity work currently undertaken by local authorities and by LBAP partnerships. If the 'refresh' improves communication this is likely to be beneficial for nature recovery. If Welsh Government is proposing to abolish LBAP's this is unlikely to be well received. It would undermine the partnership working, which supports significant 'on the ground' practical biodiversity work, to the detriment of nature recovery. The LBAP groups are mostly made up of local people who participate voluntarily. This is a resource to support Welsh Government to implement nature recovery actions if funding can be targeted to assist them.

## **5. What additional action would you wish to see?**

Recognition by Welsh Government of the value of the LBAP system for

delivering 'on the ground' practical biodiversity work that is benefitting nature recovery. The varied approaches reflect local conditions, allow for innovation and engage local communities, businesses and local expertise. Joint working and regional groups allow for sharing of best practice and liaison with ecosystem groups, in particular with regard to informing and implementing national priorities. An action would be to strengthen WBP from the bottom ensuring that support (Local Biodiversity Officers) are in place and that the work of the Local Biodiversity Forums/Partnerships is acknowledged and appreciated.

An action to support LAs to deliver their biodiversity duty would be helpful. LA ecologists are the frontline defence against continued biodiversity loss to development and public sector land management, and they deliver biodiversity enhancement and gains through involvement in public sector projects. They also provide the main mechanism for engagement of other sectors at a local level. It is therefore key that they are provided support to continue these roles and to develop them further in the context of the Well-being of Future Generations Bill.

Practical on the ground action. The Plan must acknowledge that nature recovery is dependent on practical action. This can include awareness raising, site protection, research and monitoring but it must also include land management. Managing land for biodiversity is fundamental to nature recovery. Resourcing land management is a particular challenge that needs to be addressed by the plan.

Too many initiatives are based on a poor understanding of the science of nature conservation. The role of specialists, in particular field ecologists, is important but there is also a need for good communicators who can explain the science without 'dumbing down'. It is often assumed that the public cannot grasp habitat and species issues, but this is rarely true. More often poor communication and a poor understanding of the science by policy makers is the issue.

## **6. How do we engage with business more effectively to deliver our ambition?**

Engage better with other WG departments. It has been suggested several times that other WG departments attend the WBP Conference

and that workshops are held to discuss with such people (e.g. transport, healthcare, business) what their barriers are with ecologists. Actually discussing with them what they can do and what they think is unreasonable would be the best approach.

Maintain efficient and effective regulation of activities that cause biodiversity loss. There is concern that the implications of deregulation for biodiversity are not being adequately considered.

Business rarely acts from altruism, an incentive or sanction is usually necessary. BREEAM was supposed to deliver positive outcomes for biodiversity but it has been unsuccessful in halting biodiversity loss and the mitigation proposals are often more damaging than beneficial to biodiversity. Plug planting  $x$  plus one species (where  $x$  is the number of species destroyed) is purely a box ticking exercise. Strong planning policy, with a S106 or CIL system that can be enforced (and not watered down by viability assessment) to ensure appropriate management of land for biodiversity is a much more effective tool.

Grants for infrastructure, regeneration projects and businesses etc. should include biodiversity requirements. As suggested above, Welsh Government grants for all sectors should take into account biodiversity requirements (as per NERC) and ensure that applicants are not penalised due to seasonality requirements. A small grant scheme for businesses to manage their land holdings for biodiversity is another option.

## **7. How can we strengthen the way we work together?**

Acknowledge the contribution of the LBAP system to practical action, partnership working and information exchange between the local and the national. Acknowledge the role of LA officers in promoting biodiversity in the planning system, in public land management, in raising awareness and in promoting the NERC biodiversity duty. This role should be strengthened with regard to the duties on public bodies proposed in the under Wellbeing of Future Generations Bill.

Ensure that Natural Resources Wales and Welsh Government work with Local Authorities, including ecologists, when developing area natural resource management plans and statements under the provisions of the

Environment Bill.

Support regional groups such as GlamBAG/GGBAG and cross border/regional working. Make sure that high level organisations, NRW/WG, engage fully with the system and lead by example. Re-instate Wales-wide advisory bodies such as PONT, which provide invaluable assistance to many local grazing schemes in Wales.

As indicated above, the planning system is a key tool for halting biodiversity loss and promoting nature recovery. Local Planning Authorities (LPA) are charged with the role of preparing Local Development Plans and determining planning applications. NRW is a statutory consultee and it is important that all the information relevant to a plan proposal or planning application is provided to the planning authority. NRW is not the decision making authority and should provide advice across the whole of their statutory consultation remit and not pre-judge which issues should be prioritised by the LPA. The NERC duty requires that biodiversity issues be properly addressed in these statutory consultations. If the role of NRW as a statutory consultee is to change, this should be clearly stated and consulted upon.

### **8. How can we share budgets and look at integrated outcomes?**

Work with other WG departments first and lead by example. Avoid funding projects which cause biodiversity loss. Integrate biodiversity conservation delivery into other sector funding e.g. for regeneration or infrastructure projects. Grants for infrastructure, regeneration projects, voluntary sector and businesses should include biodiversity requirements (as per NERC) and ensure that applicants are not penalised due to seasonality requirements.

Restore to the system of disseminated targets (e.g. the former Wales Biodiversity targets). If it is done properly, essential works can be disseminated to the local level and the funding distributed accordingly.

Develop a funding system that is ring-fenced, long-term, transparent and accountable but simple and cheap to administer, for both the funder and the recipient. This will minimise the resources currently wasted across the sector on grant applications.

Support regional groups such as GlamBAG/GGBAG and resource cross border/regional projects.

### **9. What else should be done to avoid duplication and to deliver our goals?**

Invest in a better reporting system and ensure NRW use it.

Support the existing LBAP mechanisms that co-ordinate local knowledge, expertise and action' on the ground'. Develop the links between LBAPs and regional groupings, the ecosystem groups and the Wales Biodiversity Strategy Board to share information and promote action.

Appropriately resource the sector. If WG do believe that biodiversity underpins all other sectors then why is the sector so poorly funded? For example the total all Wales nature fund monies would be nothing for a local engineering infrastructure project. Avoid repeating the fiasco of the £6m Nature Fund.

### **10. How can we best use the Information Hub to collate and disseminate data and evidence?**

We haven't had any experience of giving or receiving data from the Hub so we are unable to comment. See

<http://www.conservationevidence.com/> for an excellent model. Are there plans to integrate the local records centres into the hub?

Resources also need to be targeted to collect appropriate data. The value of field expertise (both professional and amateur) for the collection and verification of the evidence base must be recognised and supported.

### **11. How best should we communicate progress with delivery of our ambition, for example, by a three or five year work programme or an annual delivery plan?**

Long-term work programmes and funding streams – short-term reporting time frames.

### **12. We have asked a number of specific questions. Please let us know if you think there are related issues which we have not specifically addressed and provide further information.**

Clarity of language and the definition to terms have been raised as issues throughout this response. The Plan must be clearly written for the target audience. The status of the Nature Recovery Plan as the Biodiversity Strategy for Wales should be acknowledged.

The lack of clarity across the consultation means that it is unclear what exactly is proposed and how it is to be achieved. Biodiversity decline is continuing and the resources to address the decline are also diminishing. Much progress had been made in Wales addressing biodiversity through nature conservation measures. It is accepted that despite this biodiversity loss has continued. We accept that nature conservation measures are not sufficient to halt biodiversity loss but they are essential and successful mechanisms should not be abandoned.

We had hoped that this consultation would set out how Welsh Government proposed to 'step up' the approach to biodiversity conservation by tackling the broader concept of ecosystem services. If biodiversity loss is to be halted, it will require changes to the activities that cause biodiversity loss. The ideas promoted in Sustaining a Living Wales suggested that raising the profile of ecosystem services would provide a mechanism to engage other sectors responsible for biodiversity loss. Unfortunately this consultation has not taken this proposal forward to any practical extent.

The lack of recognition of delivery mechanisms (in particular LBAPS, Local Authorities and the Planning System) has been highlighted throughout this response. The failure to acknowledge mechanisms which are successfully contributing to the maintenance of biodiversity and which are currently under threat, does not bode well for future nature recovery.

Man made ecosystems can play a role in conserving biodiversity and in creating artificial ecosystem services. For example, green/brown roofs/walls have multiple benefits and should be a design requirement on appropriate buildings, implemented through the planning system.

**Ref. 0072 - Dawn Thomas**

I had to write a grant proposal the other day and looked at how the



proposal would meet both the outcomes in response to the Biodiversity Action plans and goals in a similar proposal in 2009 and the how this can be related to the ones today and I found it very difficult to fit the proposed outcomes with the wishy-washy goals on your webpages.

This is also a clear problem with the Nature recovery plan draft. Whilst we all love a bit of poetry and creative writing in Wales, our government needs to keep it to the speeches. Stop expecting us to venture into our imaginations when clear action and leadership is required. Without action plans you're spending tax payers money on vague meetings and launching booklets. This is time wasted when we need to be getting down to the act of recovering nature and encouraging Wales, strongly, to take this on board. This needs to be done on every street, park, beach, pond, nature reserve and railway track.

You have a choice - you can repeat similar mistakes and continue in this vague and listless manner or you can choose to look at the bigger picture, the further future and start to build a clear legacy. We will continue to work hard to help our natural world, it's now up to you to decide if you're going to make that so much more difficult for us and, ultimately for Wales.

I hope you make the correct decision.

Be brave

## **Ref. 0073 - Vincent Wildlife Trust**

**1: Do you agree with the focus of the ambition on addressing the underlying resilience of our ecosystems and identifying and capturing benefits for society? If not, what else do we need to consider?**

VWT welcomes the ambition for halting and reducing the decline of biodiversity in Wales. The plan needs to provide further details on exactly how this is to be implemented, ie timeframe, and by whom.

The plan places much reliance on the improved management and enhancement of biodiversity within protected areas, but does not address

the issue of declining biodiversity within the wider countryside – stating that “The wider countryside, in contrast, is under pressure to deliver particular services as efficiently as possible, and as such, cannot necessarily maintain this underlying diversity”. Protecting biodiversity within protected sites may well slow the loss of species diversity, but will mask the continued decline of the abundance of those species. Specific objectives for the wider countryside should be addressed, with the RDP and Future Generations Bill as potential vehicles for incentives/agri-environment schemes. Simple measures such as replacing stock fence with hedgerows, introducing a minimum field margin size, and bringing woodlands into active management can have an impact.

The ambition statement is positive, but overemphasises the economic and societal value of biodiversity. The plan should explicitly acknowledge the potential of the undiscovered value within biodiversity, the intrinsic, existence value of species, as well as their value to human wellbeing.

## **2. Does the ambition statement capture this new approach fully? What might be added?**

Benchmarks and criteria to measure change must be made explicit if we are to try and reverse the decline in biodiversity. There is a wealth of information on species records existing in local records centres and NGOs which should be collated and used to produce a ‘State of Nature’ style report (Burns, Eaton & Gregory et al 2013), specifically for Wales, which can act as guidance and provide a baseline to work from – it might also be used to create a ‘watch list’ for vulnerable species, indicating when and what action should be initiated in the event of a negative change in the species distribution/population size/emerging threat. This method is currently successfully employed by the VWT, and forms the basis of our targeted species specific approach.

The statement should acknowledge society’s commitment as environmental stewards, and recognise the intrinsic value of biodiversity, not just focus on societal benefits derived from the economics of biodiversity.

Reversing the decline in biodiversity is paramount, but it should be recognised that many species and habitats have already disappeared.

Restoration of these absent species and habitats would contribute towards diversifying Welsh ecosystems and instilling resilience into the environment. For example, the VWT is currently planning a UK first - the translocation of pine martens from Scotland to Wales to prevent the complete extinction of the Welsh pine marten population. The pine marten has been absent from the great majority of its former Welsh range for decades, arguably allowing the increased abundance of the grey squirrel, an invasive pest species, which impacts other native species through direct and indirect competition and predation. This proactive example of reinstating rare and absent native species should be adopted, and support should be provided to projects which attempt this, providing there is robust justification and majority public support. Many of the natural processes within our ecosystems are currently propped up by people at great expense, whereas native fauna would have historically carried out the same tasks for free and in perpetuity – the pine marten is an excellent example.

The plan does not address the decline in biodiversity in the wider countryside. We feel one method that can significantly address this is diversification and improved connectivity within state forestry, adopting continuous cover approaches over traditional clear fell cycles. This will lead not only to greater resilience through a net increase in available habitat and quality of resources for woodland species, but also deliver societal and economic benefits through increased recreation and tourism opportunities. It is worth noting that the remaining red squirrel populations in Wales persist in state and private forestry, not protected areas.

Most importantly, diversifying the structure and composition of commercial plantations will help buffer the forestry industry against the uncertainties of a changing climate – an Aichi target. Applying this will also contribute to the “Quality of Condition” and “Adaptability” of woodlands. Buffering zones should be introduced around forestry – currently, in many forests, the spruce wood ends and sheep pasture begins, denying the opportunity of edge and transitional habitat to many species. Priority species such as black grouse would benefit from this.

### **3: Are our goals the right ones? What might be added?**

The goals indicate movement in the right direction, but the plan needs

much more detail on timescales, responsibilities, prioritisation of threats to biodiversity, measurement criteria, resource availability and detail of the nature and prioritisation of these resources. We support the goal to open up funding for NGOs and facilitate collaboration.

The plan recognises that integrated approaches are required. As an organisation that works to conserve rare and endangered mammals, VWT welcomes this. Our current pine marten work serves a good example of where this could be implemented. The Pumlumon Project, delivered by Montgomeryshire Wildlife Trust, seeks to restore natural habitat such as Fridd and gorge woodland to the upper reaches of the Pumlumon catchment, ultimately seeking to mitigate flooding in the Severn basin. Currently, grey squirrels significantly hamper efforts to grow broadleaf woodland. At the species level scale, our pine marten restoration work could ultimately contribute to the ecosystem restoration scale approach implemented by MWT. The same principle was discussed at the Nature Fund consultation in Rhayader between the VWT and the Wye and Usk Foundation – the will and understanding is there. A streamlined licencing and permission process should be developed as a tool for facilitating integrated projects and partnerships that demonstrate a clear benefit to biodiversity conservation.

#### **4: Are the actions proposed right and adequate?**

The themes are encouraging, but the omission of the wider countryside as a target for conservation management measures greatly increases the risk that the plan will be inadequate to achieve the goal of reversing the decline of biodiversity.

Animal species do not respect designated boundaries. Highly mobile species such as bats, birds and predatory mammals, with large home ranges, could suffer disproportionately if the focus of conservation effort is predominantly targeted at protected sites. VWT welcomes the recognition of the crucial value that connectivity and corridors contribute to conservation.

Greater public engagement and education is welcomed, though it should be achieved by developing the excellent work already conducted by NGOs. The plan provides an opportunity to facilitate the delivery of an

enlightened, factual message about our predator species, a subject close to the heart of VWT work. Traditional negative attitudes towards predators still prevail, often in the same remote, rural enclaves in which those predators persist. They are seen more often as pests and threats rather than integral components of ecosystems. A growing body of evidence is highlighting the regulatory role of predators, promoting biodiversity and maintaining balance. The plan represents an opportunity to present predators in their true light – as valued, vital constituents of our ecosystems.

We welcome the commitment to monitoring, which will set the baselines for measuring change. This represents another opportunity to provide funding and support in kind to organisations that conduct specialist monitoring.

#### **5: What additional action would you wish to see?**

We would like to see a commitment to the application of measures (mentioned in relation to Q2) to diversify state forestry to benefit biodiversity. We would also like to see more woodland come into active management – there is much potential, currently under-appreciated, in small scale privately owned woodland.

We would also like to see the pervading paradigm of negative attitudes towards predators addressed and ameliorated in rural areas through education and awareness work. On this vein, we would be wary of letting society dictate “priority species or habitats that society wishes specifically to see benefit from improvements to our ecosystems.” These decisions should be led primarily by informed conservation groups, with public consultation and wider awareness work addressed as part of the feasibility and implementary process.

#### **6: How do we engage with business more effectively to deliver our ambition?**

Encourage businesses to recognise the cultural value of native wildlife, and take a stronger stance on enforcing best practice guidance for environmental businesses. Look to Scotland – wildlife tourism is one of Scotland’s most sustainable industries, worth approx. £1.4 billion to the Scottish economy. White tailed eagles bring in £2 million a year to the island of Mull, whilst

bottlenose dolphins contribute

£4 million a year to the east coast.

### **7: How can we strengthen the way we work together?**

Development of a streamlined application process for licences and permission.

Pro-active facilitation of linking funding sources to external projects by NRW. Much time and effort is expended by small organisations searching for sources of funding for worthy projects. It would be very useful if NRW could proactively facilitate the coming together of funders and project implementers, so that better use of resources is optimised in Wales.

Clarification of the chain of command and responsibilities of staff within NRW - we recognise that this will come with time as the organisation beds in, but it is currently unclear who has responsibility/remit for what at a detailed implementation level. As such meetings still have representatives of all three legacy bodies in attendance rather than a joined up perspective from NRW. This makes it difficult for external organisations to be confident about NRW direction and intentions, making planning ahead more risky.

### **8: How can we share budgets and look at integrated outcomes?**

By working with facilitation organisations such as Wales Environment Link who can represent a wide variety of nature focused organisations.

The Nature Fund should be developed into a long term programme of work with a clear strategy and criteria attached to its activities. It should have external representatives on a Fund Committee to help decide where the best impact for Wales can be gained.

### **9: What else should be done to avoid duplication and to deliver our goals?**

The BAP partnership process worked well in getting all nature representatives around the table working to a common plan. Lessons should be learnt from this and a Nature Recovery Plan developed in conjunction with externally elected representatives that can feed into

various other forums.

**10: How can we best use the Information Hub to collate and disseminate data and evidence?**

We don't know what this is – and when we Google it, only a Life Sciences Hub is listed – is this what you mean? It clearly needs to be promoted more!

If it is the Welsh Government website, there should be a section on Nature Recovery which is easy to search for with uploaded documents, blogs, links to other websites etc

**11: How best should we communicate progress with delivery of our ambition, for example, by a three or five year work programme or an annual delivery plan?**

Via the Website/blogs and e-newsletters which can easily be circulated by email. An Annual update workshop or seminar would also be useful.

**12: We have asked a number of specific questions. Please let us know if you think there are related issues which we have not specifically addressed, and provide further information.**

The main drivers of biodiversity decline have not been explicitly identified, which hampers the plan's ability to address and set out mitigation priorities to combat biodiversity loss, most notably for the wider countryside, and farming practices in particular. The plan needs to be bold in identifying these drivers, showing a strong commitment by facing the problems and setting the precedent for NGOs to follow.

**Ref. 0074 - Biodiversity Information Service for Powys & Brecon Beacons National Park**

**1. Do you agree with the focus of the ambition on addressing the underlying resilience of our ecosystems and identifying and capturing benefits for society? If not, what else do we need to consider?**

Yes broadly but because it is so vague and can be interpreted indifferent

ways it is difficult to assess whether the actual needs of biodiversity loss will be sufficiently addressed.

I think 'underlying the resilience of our ecosystems' is a difficult concept for the public to understand. An ecosystem needs to be allowed to be resilient and society put restraints on that. The need to respect our environment for ourselves and biodiversity should be a government priority instead of appearing to be very low in political importance and commercial considerations coming first.

## **2. Does the ambition statement capture this new approach fully? What might be added?**

No because of the use of the term 'net biodiversity'. There could be a net increase in biodiversity with the increase of common species, new species migrating in or, species difficult to identify newly recorded. However we may have lost current or historical priority, rare or locally important spp in that mix. That is why National and Local Biodiversity Action Plans are important to define priorities and look at historical data.

Should have the ambition to restore lost specific spp and habitats where appropriate. Need to refer to maintaining, improving and extending current species and habitats. It should not be acceptable to replace ancient habitats with new created habitats elsewhere.

## **3. Are our goals the right ones? What might be added?**

Again 'no net loss' is misleading.

## **4. Are the actions proposed right and adequate?**

I would like to see the skills and work of the present network of conservation bodies and individuals fully acknowledged and supported. This includes Local Records Centres (LRCs), LBAPs, Wildlife Trusts, Schemes and Societies and the volunteer recording community. At the moment funding is so reduced to these bodies and Local Authorities, with the loss of LBAP officers, ecologists, taxonomists and other skilled workers' that biodiversity is not being taken fully into account because there is not the expertise or resources to do this. It has become standard practice to only consider Priority and Protected species for planning



applications or development, ignoring the rare and locally important species that might also be lost. Building an adequate evidence base is essential but is of no use if it is not considered or adequately interpreted. We should aim to build-on and develop the biodiversity structure in place so that the ambitions of the Welsh Government for Nature Recovery can be met fully.

## **5. What additional action would you wish to see?**

Maintaining, increasing and supporting taxonomic skills. Recent trends have been to cut down on these experts within national organisations. Building the species evidence base is heavily dependent on these specialist recorders. With promotion of 'citizen science' and on-line recording there is increased mobilisation of data with an enormous pressure on a decreasing number of specialists to carry out verification work voluntarily. Understanding and identification of many taxonomic groups such as lower plants or invertebrates take a lifetime's work and dedication. It is equally important that there is still a career path for specialist taxonomists either in academia or within the conservation agencies. In no other profession is there such reliance on volunteers for such expertise and collection of evidence.

## **7. How can we strengthen the way we work together?**

I feel there has been a close working relationship within LBAP partnerships but these are disintegrating because of the loss of LBAP officers and biodiversity being seen as a low priority because of funding cuts. As stated in 4 the biodiversity infrastructure should be maintained and built-on rather than losing skills and then have to start all over again. Partnerships always work better with leadership. I feel there is a strong will to do this at local level if allowed to. LRCs also provide strong leadership working with local and national partners plus supporting the local recording community.

## **8. How can we share budgets and look at integrated outcomes?**

Local Record Centres Wales provides an excellent example of individual companies working as a network and sharing skills, knowledge and workload. The LRCs are small, independent businesses that are flexible and adaptable. They work on a relatively small budget and are innovative

in their technical development utilising 'free source' software when appropriate. Between them they have ecological, taxonomic, business management and IT staff skills. Individual managers take the lead for negotiation with national partners on behalf of the 4 LRCS and so have increased their national funding partners. Through standardisation of data and sharing IT skills they have developed the capability to combine their species information into an all-Wales dataset. This opens up considerable opportunities for providing national products, analysis and web services.

Sharing of national datasets such as OS, soils, climate would allow more local interpretation of the data for local biodiversity.

### **9. What else should be done to avoid duplication and to deliver our goals?**

The whole process of having to bid for funding or fit to certain targets can cause duplication. Instead of applying for funding for projects that people know are needed for local biodiversity needs, organisations have to adapt their funding bids to inappropriate targets or time constraints, in order to get funding for what they really need. Alternatively several organisations jump on a particular bandwagon to get funding for a similar project. This is particularly seen in capturing data on hand-held devices and websites or monitoring invasive species.

Consistent core funding to wildlife organisations will allow them to plan ahead, retain staff skills and provide long term management of habitats and species. This should be balanced with additional funding pots for particular objectives which are carefully scrutinised for duplication and local need. We therefore need easy accessible information as to all funded biodiversity projects in Wales including UK funding, to see where we can collaborate and not duplicate effort.

### **10. How can we best use the Information Hub to collate and disseminate data and evidence?**

At present it is not clear what the 'Information Hub' is or how and who will use it. Over the last 13 years past Welsh Government ministers have promoted the development of a network of 4 Local Record Centres in Wales and now most conservation bodies and individuals would

recognise the LRCs as the main source of readily accessible biodiversity data. At the moment it is not clear where the LRCs fit into the information hub. The LRCS should be central to the Information Hub. Over the past 13 years they have developed relationships with local recorders to exchange data. At the moment they hold approx. 7 million records between them. 800,000 of which are Priority species. They have developed sophisticated systems for reporting on planning and development schemes, plus a suite of products and services for funding partners, including an on-line data access tool. LRCs should be seen to not only collate and report on species and habitat data but be able to extend the type of data they hold and provide statistical, analytical and predictive modelling services on that data.

Although this huge amount of biodiversity information has been mobilised and is readily available, some Local Authorities and the WG are still not utilising it to ensure biodiversity is taken into account in the decision-making process. It is important that in the future such species data is used in the best possible way by all departments whose actions may have an impact on biodiversity.

The evidence base would be greatly improved by ensuring all nature conservation bodies share their data with Local Record Centres and data gathered through agri-environmental schemes and planning applications is also available for full use through LRCs. The Wales Environmental information Forum was set up to facilitate this. However after initial enthusiasm it was left to former CCW reps and LRC managers to carry on the work. Despite intensive discussions there is still a lot of data that is not being made freely available to the LRCs and to the general biological recording community. Some may be held by Local Authorities, by national organisations including NRW and WG, and some by commercial environmental consultancies. Scotland has been able to develop this work with the aid of a project manager to facilitate data exchange and data flow.

## **11. How best should we communicate progress with delivery of our ambition, for example, by a three or five year work programme or an annual delivery plan?**

An annual delivery plan

BARS can be used to communicate progress

## **Ref. 0075 - National Trust Wales**

National Trust Wales welcomes Welsh Government's intent to consult on and create a Nature Recovery Plan for Wales. As an organisation we are aware that biodiversity is under threat in Wales and that this loss of biodiversity can lead to the damage, disruption and loss of ecosystem services and function on which we all rely.

We are convinced that a Nature Recovery Plan could create an integrated approach in order to reverse the decline of biodiversity and meet our international commitments under the Convention on Biological Diversity. However, we feel the Nature Recovery Plan is more of a high level strategy document than a plan and that careful consideration should be given to the following at the next stage.

### **1. The need for a targeted approach**

We feel that the plan needs to set ambitious, clear and measurable targets. Targets are essential to maintain accountability of those aiming to deliver the plan. They are also important in allowing prioritisation of action within Welsh Government. Such targets also give a clear steer to partners such as ourselves and allow us to align our delivery plans with the ambitions of Welsh Government.

### **2. Mechanisms for delivery**

We also note that while there is a stated ambition to establish an Ambition > Goal > Action hierarchy that the mechanisms for delivery of the plans goals and ambitions are sometimes unclear. We would like to see clarity on what the actions are and whether Welsh Government expects to deliver alone or through partnership.

The plan should recognise the already existing approaches to halting biodiversity decline which are already in place in Wales. Methods such as protected sites, species recovery plans and large scale habitat restoration projects are already in place and serious consideration should be given to how these can better be supported to achieve the ambitions set out in the

Nature Recovery Plan. Similarly it should be considered how existing Wales Biodiversity Partnerships can be used to create appropriate local partnerships to lead the nature zone areas for the long term.

### **3. The need for a holistic approach**

National Trust Wales feels that a holistic approach needs to be taken to biodiversity loss and that the Nature Recovery Plan does not cast the net wide enough. Experience has shown us that drivers of biodiversity loss are diverse. Areas such as agricultural and forestry policy have and continue to be key drivers of biodiversity change in the terrestrial environments of Wales. Only by making a plan which addresses cross-sectorial issues will we succeed in achieving healthy ecosystems and reversing the trend of biodiversity loss.

### **4. Addressing change**

We would like to emphasise that conservation is not simply preserving or enhancing the status quo, conservation is the careful management of change. We are starting to see the impacts of climate change in incremental changes to our climate, increasingly extreme weather events and sea level rise. The plan needs to recognise that we are operating in a changing environment and so encompass how we can adapt to and mitigate for the effects of climate change on ecosystems and biodiversity.

The Trust plans to demonstrate this approach ourselves at Freshwater West SSSI where we are working with the land to allow sea level rise to occur naturally and instate new salt-marsh in the area.

### **5. The need for engagement**

National Trust Wales agrees that there is a need for effective communication and engagement around biodiversity in the Nature Recovery Plan. In order for people to look after places and the biodiversity they support in the future we need to work together to engage and inspire them now.

### **6. The need for sound scientific evidence**

The Welsh Government must aim to oversee the gathering of sound scientific data around biodiversity whether through government agencies

or partnership with educational institutions and the third sector. Without a sound baseline of data we are unable to monitor the impacts of the nature recovery plan and other external factors on biodiversity. Wales has an opportunity to lead the way in terms of monitoring and surveying, promoting use of new technology such as geolocators on migratory birds or drones for surveying inhospitable terrain.

We believe the next steps for Welsh Government should be, to identify goals and actions needed to reach them, to outline how these actions will be resourced, and to put in place a process for monitoring and reviewing the success of those actions. Once this has been done we would appreciate being consulted again as a key delivery partner for the plan.

### **Consultation Questions**

**1. Do you agree with the focus of the ambition on addressing the underlying resilience of our ecosystems and identifying and capturing benefits for society? If not, what else do we need to consider?**

In broad terms we do support the focus of the ambition stated in the Nature Recovery Plan.

We do wish to note however that taking a broad view with a focus on ecosystem resilience does not negate the need for focus on particular species and habitats in many cases. In many cases the provision of public goods is a balancing act and taking an ecosystems approach might often hide biodiversity impacts. For example, retention of *Molinia* dominated modified bog can provide clean water from a peat dominated catchment but the value to wildlife will be limited. A focus on Natural Resource Management won't always address all the complex pressures in the natural world, and especially if the focus is halting the decline of biodiversity.

If we are to truly deliver strong outcomes for biodiversity there needs to be a focus on species and the intrinsic value of those species not merely their function in retaining ecosystem function.

**2. Does the ambition statement capture this new approach fully? What might be added?**

We feel that the stated ambition of the Nature Recovery Plan should be expanded to cover promoting the understanding of biodiversity, habitats species and the ecosystems approach. If the Nature Recovery Plan wishes it's work to be sustained in the long term it should have an enduring focus on engaging and teaching people. Only by doing so will momentum be retained and any positive change delivered through the Nature Recover Plan be sustained.

We feel that the ambition statement should outline a clear path from ambition to outcomes. To show a clear method of progressing from an ambition, to a framework to enable delivery would add enormous value to the statement.

### **3. Are our goals the right ones? What might be added?**

We appreciate the formulation of goals, but again feel that the addition of targets and milestones are needed for each goal. Without such targets, as an organisation we can take no direction from the goals in our partnership or independent work.

Goal 1 – To improve degraded habitats at scale

This should address short term plans like the Strategic Plan 2020 and also encompass the longer term goals. The goal needs to cover restoration, enhancement and maintenance and should state specific habitats and species. The scale at which this goal is applied needs to be appropriate for the nature of Wales, to ensure it addresses the needs of the intimate mix and complex nature of our smaller scale habitats. Some of our precious jewels occur at a very small scale but are still important part of fabric of our natural environment and they need to be fully recognised in the delivery plan e.g. flower rich meadows.

The Trust is already reaping the rewards of working beyond the boundaries of a habitat in order to properly protect it. Flower rich meadows are one of our rarest and most precious habitats and often sit in isolation in a sea of farmland. We have worked with our tenants and on our land to try and ensure good management of our meadows and develop new areas of meadows at Dinefwr Home Farm and sites in North Pembrokeshire. With support from NRW we have taken a similar approach in the land adjacent to our gardens at Bodnant and Plas

Newydd.

Goal 2 – To address key negative factors of biodiversity loss and increase connectivity significantly

We would agree with this goal, but highlight that there needs to be a commitment from decision-makers across local and national government in order to take the joined up approach needed to address negative factors for biodiversity loss and increase connectivity.

As already stated we feel that agricultural practice and policy can be a negative factor for biodiversity in some cases. Biodiversity needs to be taken into account in all agricultural policy not only the design of agri-environment schemes so that the direction of travel for agriculture in Wales is not damaging for our biodiversity. In fact we would suggest that agri-environment programmes are the perfect vehicle for delivering connectivity in particular through trialling approaches such as used in the very successful Burren Life project.

Goal 3 – To improve management of our highest quality environments

We fully support this goal and are glad to see separate and specific recognition of our ancient and complex environments.

We would recommend that some time is spent establishing what is meant by 'highest quality' in this context. We should also note that some high quality places are in the sea or part of a highly modified land, for example our extensive parklands.

Furthermore we suggest that the restoration of high quality environments has to be done hand-in-hand with enhancing the more extensive more modified ecosystems that surrounds them. We have learnt that ecosystems and environments do not function independently of each other and if we are to help nature recovery we will need to care for our high quality environments as part of a landscape-scale approach. For a range of ecosystem services the whole landscape needs to be enhanced not just the high quality parts of that landscape.

We also recognise that some of our highest quality environments for nature have been entirely shaped by human actions, such as the



designed landscape of Dinefwr Park. In order to manage these places successfully understanding is needed from local landowners and planning authorities about the impact of practices of others on high quality environments- a good example being emissions of Nitric Oxide on rare parkland lichens.

#### Goal 4 – To achieve ‘no net loss’ of biodiversity

While we agree that no net loss of biodiversity is desirable we would emphasise that no loss of biodiversity is more desirable. While we understand and support offsetting and translocation in certain situations the approach of caring for what we have, where we have it should be prioritised.

The best way to achieve this goal is undoubtedly to maintain habitats insitu. As recognised by goal 3 the environment is complex and ancient and much of it can never be replicated or trans-located. This is especially true of habitats with complex hydrology and habitats such as parkland. It is not just the recreation of the physical environment which is the problem; the link of a nature rich place to its past cannot be re-created in the short or medium-term and it's this link and its manifestation in the species it supports that makes our existing habitats so valuable.

This is not to say that we do not recognise that change can occur and that as a consequence of this change we may come to have slightly different but equally important communities where the idea of ‘no net loss’ applies.

Finally, in relation to this goal we note the importance of a fully resourced mechanism to monitor and record loss of biodiversity. If we do not know what we have in terms of biodiversity we will be unable to monitor change to populations, which is the only indicator of progress in relation to this Plan.

#### Goal 5 – To put in place a framework of governance to support delivery, working together across sectors and strengthening our collective evidence base

We agree that a framework is needed across sectors including agriculture and forestry. In order to achieve tangible results the actions

within the framework must be well resourced.

Additional Goal for inclusion;

- Public understanding, engagement and participation- There is nothing in the above goals that sets out a pathway for enthusing, educating and involving the public in the natural environment. Actions encompassed by this goal range from early years engagement to higher education funding. At graduate and post graduate level there could be strengthening of the research and monitoring role in the environment that is already taking place.

#### **4. Are the actions proposed right and adequate? What additional action would you wish to see?**

In principle the actions are welcomed but they can only be effective if tied down to targets and milestones

Action 1 – Putting in place effective natural resource management

National Trust Wales has wholeheartedly supported the concept of natural resource management. However more details are needed as to how this approach will balance provision of ecosystem services to ensure it delivers for our species and habitats.

We would expect effective natural resource management to protect precious and designated sites, recognising them as reservoirs of rich biodiversity and the building blocks of healthy natural resources. We would also expect that once in place the impacts of natural resource management on biodiversity is monitored and reported.

Action 2 – Delivering a Welsh National Marine Plan (WNMP)

We agree that delivery of a Welsh National Marine Plan is hugely important and we will be participating in the consultation process. We would like to see a holistic approach and one that prepared Wales for the changes we are seeing on our coastline. We support Marine Conservation Zones but would also like to see a joined up approach to land and sea, with active ambition and targets for coastal adaptation.

Action 3 – Facilitating cross-sector policy integration

As already stated we see policy-integration as a key action for the Nature Recovery Plan. The ability to influence decisions made in other sectors notably but not solely agriculture is hugely important for biodiversity.

Welsh Government could lead on consideration of biodiversity by using their approach to their own landholdings as an exemplar for others.

We believe another pathway for enhancing integration is through the strengthening of the

NERC duty. Where this has been done in Scotland, to include enhancement and more consideration for S42 species and habitats, greater weight is being given to biodiversity cross-sectorally.

#### Action 4 – Funding our partners

We are in complete agreement that working with and funding of partners is crucial to achieving the ambitions of the plan.

In order to make a partnership approach work there will need to be investment in the structure which supports formation of such partnerships. As a starting point each of the Welsh Nature Recovery zones needs dedicated staff to draw partners together and to seek funding and secure long term sustainability of initiatives.

The new structure should make a concerted effort not to reinvent the wheel, as there are existing structures which work very well. Successful partnerships such as the HLF Llyn Landscape Partnership already bring together key stakeholders, and lessons should be learnt from the successful set-ups in place.

Another consideration will be how to work with partners who already have funding for projects from other sources including the Nature Fund. Some Nature Fund projects are being run by successful existing partnerships as mentioned, while in other areas there are several projects covering the same area with limited or no coordination between projects– e.g. Conwy. It should be a priority to address the issue of how such projects can be linked or coordinated to get the best value from money that has already been invested in partner organisations. Without a strong steer and resourced coordination it is difficult to see how individual projects can

deliver strategic priorities for the Nature Recovery Plan.

#### Action 5 – Reviewing designated sites and species

We do not believe that the role of designated sites and species is in need of a fundamental review. We would however support a review that looks into how designated sites and species can be integrated into the natural resource management approach.

We believe that designated sites should remain focused on conservation of the important habitats and species which they protect. Designated sites are a huge reservoir of biodiversity and while in some cases they could be better managed we do not feel that their role needs to be reviewed.

Rather, we should be recognising them as gems within the landscape and exploring how through creation of buffers and enhanced connectivity we can make the wider landscape and ecosystems make the work undertaken in them produce benefits beyond their boundaries.

#### Action 6 – Monitoring and reviewing regulatory instruments

We believe that all regulatory instruments should have a duty to further sustainability including the enhancement of biodiversity.

#### Action 7 – Improving the Evidence base: Research, Monitoring and Surveillance

Ideally, the plan should result in the development of a partnership between NRW, WG and data collecting NGOs with a commitment to contribute to the formation of a strong evidence base to support research, monitoring and surveillance into conservation in Wales. This evidence base should be available to all land owners and land managers so they can access the condition and direction of travel of their own land.

While we would support a national evidence base, the priority for this work should be for NRW to develop a 're-invigorated' strategy and platform for monitoring all SSSIs as well as Natur 2000 sites with their partners.

#### Action 8 – Encouraging effective Communication and Engagement

The action is welcomed. We feel strongly that in order to communicate

the importance of biodiversity and the urgency with which it's decline must be halted Welsh Government and Natural Resources Wales need to ensure that it leads the way in communication and engagement and considers impacts on biodiversity and nature across all areas of work.

#### Action 9 – Providing better Governance to benefit nature

We strongly support this action. We would highlight the need to refrain from re-inventing the wheel where existing structures are functioning. For example, we should recognise that the Wales Biodiversity Partnership, though not perfect, is probably the strongest partnership of its kind in the UK and it needs continued support. The all Wales groups such as the Ecosystem Groups have provided a welcome focus for discussion, training and action and we feel this function is important and must be considered in the revised structure.

We support the proposed refresh of the 4 elements and we feel they will provide a sound basis for the future, provided that any new structure is resourced effectively.

The National Trust is concerned about the proposal to 'identify priority species or habitat that society wishes specifically to see benefit from improvements to our ecosystems'. The approach should be based on scientific evidence as well as societal choices and these needs to be linked to increasing understanding of the challenges we face.

#### **5. How do we engage with business more effectively to deliver our ambition?**

We need recognition that most businesses are small to medium size and effort needs to be focussed here as well as with big business.

There needs to be better advice to business on environmental issues, incentives to work with NGOs and better recognition of best practice

We believe that if a good level for communication and engagement were provided around the ambition of the Nature Recovery Plan that the momentum built would incentivise more businesses to engage.

#### **7. How can we strengthen the way we work together?**

As already mentioned we would like to see support and resourcing for the Wales Biodiversity Partnership and Wales groups to allow them to perform at their best. The resource needed is often in the form of passionate and properly skilled people and we would urge Welsh Government to consider the importance of staffing.

If strengthened the WBP Ecosystem Groups they could function to provide effective networking, steer and catalyst for implementing the Nature Recovery Plan.

We would also highlight the importance of coordination at the nature zone areas. These should be led by NRW with a focus on bringing together all relevant partners and agreeing set of actions to best achieve the stated aims of the zone.

#### **8. How can we share budgets and look at integrated outcomes?**

To share budgets and have integrated outcomes strong partnership is essential. As discussed above however creation of these partnerships needs to be coordinated in order to create action. This needs a steer and funded coordination from WG/NRW to set up. Once these partnership have formed then these structures may become self-sustaining as we have seen with the Llyn Landscape Partnership, initially funded by HLF all partners have remained engaged following the initial partnership project.

We feel that the competitive bidding approach is problematic for integrated delivery between organisations. Bidding to undertake projects in already formed partnerships as in the Nature Fund process is more likely to result in integrated outcomes.

#### **9. How can we best use the Information Hub to collate and disseminate data and evidence?**

We welcome the idea of an information hub to collate and disseminate data and evidence. The hub should build on the work of Local Record Centres and the National Biodiversity Network.

#### **10. How best should we communicate progress with delivery of our ambition, for example, by a three or five year work programme or an annual delivery plan?**

In order to be able to communicate progress we need to be able to assess progress and for this we need to establish clear targets and milestones for each goal. This needs to then be worked up into short term, 5 year, and longer term plans with annual delivery and work programmes.

Progress on these goals should be reported regularly with both success and failure being reported so that lessons can be learnt for when future delivery plans are made.

## **Ref. 0076 - Anonymous**

### Consultation Questions

**1. Do you agree with the focus of the ambition on addressing the underlying resilience of our ecosystems and identifying and capturing benefits for society? If not, what else do we need to consider?**

Whilst supporting the restoration of ecosystems, it should be solely on the basis of their intrinsic value and the principles of sustainability, not “Capturing benefits for society” which gives the impression of selfish exploitation – Man is not the only species whose well-being depends upon planet Earth.

Changing from “traditional approaches” to an ecosystem approach will in itself make negligible difference. Over fifty years I have seen the introduction of numerous “fresh approaches”, but still biodiversity targets are always missed and decline continues. Ecosystems are complex, and without sufficient resources being made available no new approach will succeed in reversing the trend of decline.

**2. Does the ambition statement capture this new approach fully? What might be added?**

See 1.

**3. Are our goals the right ones? What might be added?**

Although called the “Nature Recovery PLAN”, there is confusion between

strategy and plan. A plan requires actions to implement it, and the document is almost totally devoid of practical actions that will start the reversal of biodiversity decline: passing laws or introducing new approaches do not of themselves change anything without accompanying actions.

#### **4. Are the actions proposed right and adequate?**

What actions? There are a number of largely unquantified goals and targets, but no actual actions to achieve the goals or monitor their effectiveness.

#### **5. What additional action would you wish to see?**

The main omission in the plan is any strategy to provide funding and resources to make the goals achievable. The only relevant sentence in the whole document is under “funding our partners; and identifying and using other financial instruments“, where target 20 includes “By 2020, at the latest, the mobilization of financial resources for effectively implementing the Strategic Plan for Biodiversity 2011-2020 from all sources” but no strategy or actions to actually generate the necessary funding and resources, without which the Plan remains simply a wish list.

#### **6. How do we engage with business more effectively to deliver our ambition?**

Some businesses already engage with and support wildlife conservation organisations both by grants and in kind. The Government needs to publicise the best examples and reward them (even if only with good publicity). They should also facilitate opportunities for business and conservation organisations to meet – an obvious example would be to encourage business representation on Biodiversity (LBAP) Partnerships. But above all, the Government needs to set a good example, and the way it has recently handled the M4 Relief road and the Circuit of Wales issues are classic examples of how to generate conflict rather than cooperation.

#### **7. How can we strengthen the way we work together?**

Following on from 6, support Local Biodiversity Partnerships as fora for



cooperation. Two main changes are needed :

(a) Fund them separately from local authorities. Recent cutbacks in local authority funding have been passed on disproportionately and seriously weakened many Partnerships

(b) Since the formation of NRW it has become increasingly difficult to get ex-CCW/Environment Agency/Forestry Commission staff to attend meetings. Build attendance into their work programmes.

## **8. How can we share budgets and look at integrated outcomes?**

Most biodiversity organisations are heavily dependent on volunteers to operate. As a volunteer, all I have to offer is my time and expertise, in return for which I expect to see how my efforts make a difference to wildlife. “Sharing budgets” should not be a euphemism for passing responsibility on to charities and other voluntary organisations to save costs, as this will simply have the effect of driving volunteers away.

## **9. What else should be done to avoid duplication and to deliver our goals?**

The Government needs to practice what it preaches about integrated outcomes. There are still far too many examples of the right hand not knowing what the left hand is doing. A classic example is the way Glastir is not integrated with biodiversity policy: as an example Welsh Government's Glastir agreement with Ogmere Commoners' Association a year or so ago requires most of the Old Castle Down SSSI to be subject to cutting twice a year with the aim of ELIMINATING bracken over the 5 year agreement. Bracken is a key component of habitat for the High Brown Fritillary butterfly, a Section 42 species whose survival in Wales is threatened by this Glastir agreement.

## **10. How can we best use the Information Hub to collate and disseminate data and evidence?**

Make better use of the opportunities offered by the four Welsh local environmental records centres, which form a natural system for an Information Hub which can cope either with local or all-Wales data. Use of the centres' facilities has been very patchy by Government bodies and

Local Authorities and service-level agreements with them have suffered badly as a result of funding cutbacks. As a result, I have no doubt that some decisions are now being taken based on very poor evidence.

The lercs are dependent on skilled volunteers to submit many of the records on which their work is based, and unless resources are made available to support a two-way flow which allows recorders to see how their input achieves results there is a grave danger the supply of reliable records will dry up.

**11. How best should we communicate progress with delivery of our ambition, for example, by a three or five year work programme or an annual delivery plan?**

No comment.

**12. We have asked a number of specific questions. Please let us know if you think there are related issues which we have not specifically addressed, and provide further information.**

At some stage, perhaps include a section on the role of volunteers in the Nature Recovery Plan?

**Ref. 0078 - Confederation of Forest Industries**

**Do you agree with the focus of the ambition on addressing the underlying resilience of our ecosystems and identifying and capturing benefits for society? If not, what else do we need to consider?**

1, (a) broadly, but there should also be a greater focus within the ambition on Green Growth and the economic benefits of sustainable development from natural resource management. The United Nations World Commission on Environment and Development (WCED) in its 1987 report "Our Common Future" defines sustainable development as: "Development that meets the needs of the present without compromising the ability of future generations to meet their own needs."

The ambition needs to address the needs of the present as well as the

future and ecosystems will only survive if they contribute to both.

The reference to “Reverse the decline in biodiversity” in the ambition should be in conjunction with sustainable economic development not at the expense of it.

1, (b) There should also be a recognition that individual sectors have been historically managing their natural resources to internationally agreed standards which seek to achieve a similar ambition, notably forest management to the United Kingdom Forestry Standard (UKFS), and often in addition, to international certification requirements. The ambition should surely seek to bring everyone up to an acceptable standard before imposing extra burdens on a sector that already achieves benefits above and beyond other land uses.

The consultation refers to both the “Wildlife Economy Wales: An Economic Evaluation Scoping Study” and “The UK NEA in 2011”, and as illustrated by these reports, “the many benefits that we enjoy from biodiversity represent a significant financial and natural resource asset to Wales”. The recovery plan should enable these assets to be used sustainably for the benefit of the people of Wales now and in the future.

Does the ambition statement capture this new approach fully? What might be added?

The ambition statement should be;

To reverse the decline in biodiversity and ensure lasting social, economic and environmental benefits to society by sustainable natural resource management

Are our goals the right ones? What might be added?

To improve degraded habitats at scale;

The consultation states; “We have a large extent of degraded or less diverse habitats”.

We do not agree with this statement, we are fortunate in Wales to have a vibrant commercial forestry sector that manages the Welsh forest to produce environmental and economic outputs. Forest management to

UKFS demands compromises which inevitably means choices between competing forest uses, these choices means individual forests and therefore habitats are managed differently which will lead to a range of differing habitats. The statement of “less diverse” is therefore subjective; an individual habitat may be hugely important for a specific purpose but less diverse when compared to a forest managed for a different reason.

We should recognise that productive conifer forests do indeed provide a diverse habitat but that may be a different, and no less important, habitat to that of broadleaved forests. Compared to other land uses, like intensive agriculture or deep peat, conifer forests provide a much greater biodiversity opportunity.

A point made in many published reports including “Plantation forests and biodiversity: oxymoron or opportunity?”

Eckehard G. Brockerhoff · Hervé Jactel · John A. Parrotta · Christopher P. Quine · Jeffrey Sayer. 9 April 2008 © Springer Science+Business Media B.V. 2008.

Which states;

“While a plantation stand will usually support fewer native species than a native forest at the same site, plantations are increasingly replacing other human-modified ecosystems (e.g., degraded pasture) and will almost always support a greater diversity of native species. As such, plantations can play an important role in sustaining native biodiversity in production landscapes—and indeed be an opportunity for biodiversity. As well as providing habitat in their own right, plantations play particularly important roles in buffering native forest remnants and in enhancing connectivity between areas of native ecosystems, including patches of primary forests, riparian strips, and amenity plantings

The role of plantations in biodiversity conservation can be enhanced if plantations are managed in a manner in which they can contribute to biodiversity conservation across the whole landscape, rather than focusing only on the values within the plantations themselves”.

To address key negative factors of biodiversity loss and increase connectivity significantly

Increasing the forest cover in Wales will increase connectivity and help to reduce biodiversity losses however it should be recognised that forest and habitats may be used just for the connectivity purpose and may not need to be the ideal habitat. The function of providing connectivity may be as important as providing the ideal habitat.

Addressing negative factors must include action on the control of grey squirrels and deer populations; these two pests have a huge detrimental impact on broadleaved woodland and prevent any hope of managing native woodlands for a commercial crop. Controlling grey squirrel is a specific aspiration in Woodlands for Wales and the grey squirrel is one of 5 listed species of significance mentioned in the new EU Alien invasive species directive.

To improve management of our highest quality environments. Agreed, and productive conifer forests can play a vital role in linking together these highest quality environments and provide a renewable resource at the same time, true multipurpose forestry.

To achieve 'no net loss' of biodiversity.

This concept is flawed, the history of evolution shows that the reason we have a diverse range of species is precisely because some have become extinct and others have evolved to capitalise on the space left behind.

The United Nations Convention on Biological Diversity Principle 9 states: "Management must recognize the change is inevitable" so an insistence on "no net loss of biodiversity" may be an unobtainable goal.

Biodiversity is itself a wide concept so there will inevitably need to be choices made at an individual species level. The goals should acknowledge that there will be winners and losers, that a diverse range should be the ambition without the need to micro manage habitats to try and achieve an unsustainable outcome.

Habitats within forests should be managed at a landscape scale not at an individual coupe or woodland scale. This concept requires an acceptance that, at certain times in the long term management of a forest, some areas may not provide the perfect habitat but somewhere else in the forest that perfect habitat will exist and species are free to move and

exploit it. There should be a presumption that woodlands managed to the UKFS are maintaining and enhancing biodiversity and that additional regulations are unnecessary.

To put in place a framework of governance to support delivery, working together across sectors and strengthening our collective evidence base.

Commercial forestry must be involved in the governance, many jobs and livelihoods depend on the resource productive forests provides.

Confor is well placed to help WG by facilitating the flow of information between the public and private sector to maximise the evidence base which will be used to support actions and outcomes.

WG needs to put the necessary resources in place to support delivery.

#### **4. Are the actions proposed right and adequate? The consultation proposes;**

“Putting in place effective natural resource management.

Achieving our ambition requires a fundamental shift in the legal and policy framework within which biodiversity and ecosystems are considered”

Forest management in the UK is already subject to stringent international standards, UKFS and in some cases independent third party certification. We see no justification for the need for a “fundamental shift in the legal and policy framework.” Our industry is already operating to good environmental standards and the Nature Recovery plan should acknowledge this.

The framework established by both the Environment Bill and the Well-being of Future Generations (Wales) Bill should recognise adherence to UKFS is effective natural resource management.

#### **5. What additional action would you wish to see?**

UKFS should be embedded in the National Natural Resource Policy.

A recognition that sometimes a desired outcome will have unintended consequences and that to achieve some aims difficult choices will need

to be made.

A case in point is that of pest control, the lack of effective control on grey squirrel numbers is impeding the recovery of red squirrels and anecdotally competition for the same food source is possibly reducing dormouse numbers.

Legislation to protect one species may lead to complicated and excessive demands and results in a lack of management and the subsequent loss of a different species.

## **6. How do we engage with business more effectively to deliver our ambition?**

The private forestry sector stands ready to work alongside WG and does so in many areas already both as individual owners, managers and as a sector.

Better communication of the 2014-20 RDP aims, aspirations, targets and expectations.

The commercial forest industry needs a renewable resource and they should be consulted and listened to, there should be no loss of the productive forest resource which is vital to jobs and inward investment in Wales. This is a specific outcome aspired to in Woodlands for Wales, “ensure that we maintain the volume of timber from woodland estate in the short to medium term to support sustainable development”.

## **7. How can we strengthen the way we work together?**

By improving communications between all sectors and by valuing each other's contribution.

## **8. How can we share budgets and look at integrated outcomes?**

The private forestry sector, by managing under UKFS, is already providing many of the outcomes that are desirable under the nature recovery plan consultation, including increasing biodiversity. Both UK National Ecosystem Assessment, (2011) and the State of Nature report (2013) cited in the consultation document refer to many instances where biodiversity is increasing and decreasing in equal measure.

The work of the Welsh forestry sector is often a contributory factor in these recoveries and we contest the assumption that everything is on a downward decline, in fact the glass is half full not totally empty.

The commercial forestry sector can and does make a profit and will continue to provide many of the benefits WG and society aspires to like biodiversity, recreation, water management, green growth and carbon sequestration. It cannot however operate at a loss and WG needs to ensure that, if it is making even more demands of the forest sector, sufficient funds are available to help cover the increased costs forestry will incur. Modest assistance to the commercial forestry sector will yield greater results when it combines with income from their commercial activities.

### **9. What else should be done to avoid duplication and to deliver our goals?**

Many of the functions of monitoring could be outsourced to the private sector who may already be doing something similar in their standard forest management plans.

The private forestry sector is working to UKFS, it is already under scrutiny and much of the information needed to monitor the outcomes required under the nature recovery plan may already be collected for other purposes, WG needs to make sure it asks for this information.

### **10. How can we best use the Information Hub to collate and disseminate data and evidence?**

### **11. How best should we communicate progress with delivery of our ambition, for example, by a three or five year work programme or an annual delivery plan?**

Forestry operates on a much longer timescale, typically 40 years+, many of the outcomes will only be apparent in the longer timescales. Whilst WG needs to monitor and measure progress in the short term, long term management plans will need time to bed in before the benefits become apparent.

The United Nations Convention on Biological Diversity Principle 8:



“Recognizing the varying temporal scales and lag-effects that characterize ecosystem processes, objectives for ecosystem management should be set for the long term.

Ecosystem processes are characterized by varying temporal scales and lag-effects. This inherently conflicts with the tendency of humans to favour short-term gains and immediate benefits over future ones”.

**12. We have asked a number of specific questions. Please let us know if you think there are related issues which we have not specifically addressed, and provide further information.**

Jobs, Jobs, Jobs.

**Ref. 0079 - Wales Biodiversity Partnership’s Upland Ecosystem Group**

**1. Do you agree with the focus of the ambition on addressing the underlying resilience of our ecosystems and identifying and capturing benefits for our society? If not, what else do we need to consider?**

The Wales Biodiversity Partnership Upland Ecosystem Group has serious concerns with the document and the approaches it outlines. It is the group’s opinion that these will not deliver an integrated approach to biodiversity restoration and enhancement with associated benefits to society within Wales. In short, the Nature Recovery Plan for Wales as identified is not a plan but a strategy and in its current form the Upland Ecosystem Group is unable to support the approach.

If taken forward then this current Nature Recovery Plan would need to be supported by a detailed and resourced action plan. Any ambition needs to include restoration and should also seek to engage people and encourage all sectors of society including politicians to act.

In addition before embarking on a ‘plan’ for the ‘recovery’ of nature Welsh Government / Natural Resources Wales should first and as an absolute priority be doing their utmost to prevent and halt on-going loss. For example only this year pSSSIs have been destroyed and applications

received under EIA Regs from farmers wanting to plough up the last few scraps of species-rich grassland. Sadly talk about 'planning' for 'nature recovery', while such losses continue, will not prevent continued on going loss in the meantime.

In summary the plan should set a clear direction with habitats and species being the core of our environment though a Wales wide commitment to their ongoing enhancement so that future generations will still be able to enjoy them. Within the plan there should be identified specific actions with a focus on habitats, species and networks (corridors), with an associated dedicated resource that builds upon existing success, and uses existing partnerships. The actions must be regularly monitored via training new recorders, supporting existing county recorders and the support of volunteers, and professionals from NGO's. Using existing set ups e.g. LRC's BARS there should be a monitoring and review process to enable the sharing of good practice. However it should always be borne in mind that the more concise the planning, then the more resource could go into delivery.

## **2. Does the ambition statement capture this approach fully? What might be added?**

The ambition statement does not capture a specific, realistic, timetabled or detailed approach. It is highly dependent on Natural resource Management to deliver Nature Recovery Plan, however it gives no detail on how this will be achieved. It also provides little detail on other tools and mechanisms that will be required to successfully reverse the loss of biodiversity and help nature recovery.

## **3. Are our goals the right ones? What might be added?**

Goal 1 should be reworded to 'Restore and enhance Section 42 species and habitats across Wales, so that 2020 international and national targets are successfully achieved, by working at appropriate scales in the marine, freshwater and terrestrial environments.'

Goal 2 should be reworded to 'Use Natural Resources Wales, National Parks and local authorities to combat habitat and species loss at a local and national level whilst increasing biodiversity connectivity across Wales.'

Goal 3 should be reworded to ‘Build upon existing high quality management practice of individuals and organisations across Wales to deliver resilient and biodiverse ecosystems that contribute towards the achievement of the 2020 biodiversity targets.’

Goal 4 should be reworded to ‘At a minimum, to achieve no net loss of biodiversity plus the resilience of the natural ecosystems between now and 2030.’

Goal 5 should be reworded to ‘Using the existing successful coordinated framework of the Wales Biodiversity Partnership and its Ecosystem Groups and species expert groups, improve the governance of biodiversity delivery and biodiversity evidence gathering and support. This is so that the Wales Biodiversity Partnership and their associated groups are enabled and resourced sufficiently to facilitate and support the delivery of targeted action in a coordinated fashion from the partners, based upon an evidence based approach that that will benefit section 42 species and habitats and their increased connectivity across Wales.’

New Goal – Goal 6 - Integrate the WBP evidence gaps project and ensure the Wales Environmental Research Hub is enabled to coordinate research into evidence gaps and is resourced to be the focal point where research results can be made available to on the ground practitioners across Wales.

New Goal – Goal 7 - To address, develop and implement approaches that reverse historical and current causes of biodiversity loss within Wales.

#### **4. Are the actions proposed right and adequate?**

As strategic actions the general areas covered are sufficient, but each action needs associated roles, responsibilities and accountabilities. In addition, each action should have an action plan with milestones and resources identified.

Further more, the plan should identify those actions that would need further investigation and development, and conversely those actions which, using existing knowledge within the Ecosystem Groups, could be the quick wins and deliver concrete positive outcomes for biodiversity

within a short timescale.

## **5. What additional action would you wish to see?**

- A clear agreed definition of Integrated Natural Resource Management.
- A clear acknowledgement that Integrated Natural Resource Management can deliver positively for Section 42 species and habitats, but that other tools will be equally, if not more, important to deliver concrete progress toward the achievement of national and international biodiversity targets.
- Clear objectives, outcomes and outputs identified within the plan.
- A clear ambition identified and agreed.
- A recognition that the current document is too process led without clear objectives, outcomes and outputs and that this should change.
- Goals, objectives, outcomes and outputs should be clearly linked to Section 42 species and habitat improvement.
- The Nature Recovery Plan should clearly reflect the outcomes required by the Wales Environment Strategy, BAP targets and Section 42 species and habitat improvement requirements.
- The plan should reflect SMART principles i.e. with outputs that are Specific, Measureable, Achievable, Relevant and Timetabled.
- A strong recognition that agriculture has caused a significant decline in biodiversity and ecosystem resilience in the last 50 years and that agricultural change will be integral to achievement of positive change to Section 42 species and habitats. This needs to be done in a way that preserves the culture of rural Wales and land managers will need to be convinced of its value. This will require breaking down the barriers and developing trust for which the lead organisations with the Nature Fund action zones could be empowered to do via the development of regional “upland partnerships” similar to the existing coastal partnerships and fora that bring all stakeholders together (e.g. <http://www.pembrokeshirecoastalforum.org.uk/>).

- A resourced and timetabled commitment to bring all European special sites into a favourable conservation status by 2020.
- A review of, and the subsequent implementation of the Upland Framework to help deliver the Integrated Natural Resource Management approach

## **6. How do we engage with business more effectively to deliver our ambition?**

- Additional funding from the economic sector needs to be identified to support work with the business community, as we should not divert currently over stretched and scant resources into this area until significant concrete progress has been made toward outcomes that will support 2020 international and national targets.
- Ensure the planning process is streamlined with the Ecosystem Approach so that the consequences of decisions on the environment are understood earlier in the process allowing negative impacts can be avoided or minimised. This will be beneficial both to business and biodiversity and will reduce the conflict between the sectors.
- Better provision of information to business on best practice for biodiversity.
- Develop mechanisms and incentives for encouraging businesses to engage with the NGO community to develop partnerships, which deliver for nature conservation.
- If business can be engaged more effectively and through that additional resources can be made available through this, then there would need to be structured input from the Upland Ecosystem Group into the development of any developing schemes for the uplands. This should ensure that schemes implemented are sensible, predicted benefits realised, monitored and finally that schemes are designed from their start to benefit Section 42 species and habitats.
- There must be innovative funding for Integrated Natural Resource Management in the Welsh uplands, via levies on businesses that utilise

the upland ecosystem for water provision, tourism and agriculture, unless the business is actively proven to deliver positive action for upland ecosystems. This could be based upon a similar mechanism to that used in Holland for sand dunes.

## **7. How can we strengthen the ways we work together?**

- There is already strong existing partnership working between NGOs and statutory bodies, through partnerships like the State of Nature Partnership and the Wales Biodiversity Partnership. These partnerships need to be maintained and resourced effectively.
- There should also be effective cross border working where Section 42 species and habitat restoration, and connectivity improvement, requires cross border work.
- The existing NERC duty should be reworded and strengthened.
- Each Nature Recovery Zone needs a funded officer to coordinate and integrate projects and avoid duplication – the Nature Fund tried to do this but there was insufficient time or staff resources to effectively coordinate action in any area. This person in NRW led areas could be from NRW but in areas where NGO's are currently leading engagement, project development and delivery NGO's should be fully supported to deliver this function.

## **8. How can we share budgets and look at integrated outcomes?**

- Partnerships should come together where their individual and organisational outcomes can deliver more as part of collaborative approach. However budget sharing should not be used to replace or cover a lack of funding coming from the Welsh Government to support Section 42 species and habitats delivery. Welsh Government needs to resource effective Section 42 species and habitat delivery through the proposed Integrated Natural Resource Management approach.
- Welsh Government must, through its devolved tax regime, maintain existing opportunities to fund biodiversity delivery through Landfill Tax and through the use of targeted annual and 3-5 year funding streams similar to the successful Resilient Ecosystem Fund, as well as increasing

funding availability for Section 42 species and habitat improvement. All funding streams must include provision for integrating monitoring.

### **9. What else should be done to avoid duplication and to deliver our goals?**

- Current initiatives such as LRCs, LBAPs, Wales Environment Research Hub, Local BAPS, Wales Biodiversity Partnership , Countryside Management System CMSi, use of the Biodiversity Action reporting System (BARS) and other collaborative organisations/initiatives need clarity on their future and secure resources. In Wales we can add value and work efficiently if we build on these successes and enable them to support future delivery for habitats, species and wider natural resource management.
- There should be quantification of a current baseline of existing resource, as the State of Nature report identified many gaps in our knowledge of both species and habitats.
- Also required is more detailed information on the European Annex 1 habitats particularly in the uplands where rare and threatened rock, cliff and scree habitats are poorly recorded.
- Following on from that, there should be clear measures to measure loss.

### **10. How can we best use the Information Hub to collate and disseminate data and evidence?**

- It should work with the existing network of Local Record Centres in Wales to minimise duplication and maximise delivery of a sound evidence base for action.
- The Wales Environment Research Hub, which already exists, to synthesise research and build capacity deliver evidence based policy in the environment sector should be maintained and its role enhanced. The Upland Ecosystem Group supports the development of the new WG Information Hub which will be a web based portal that aims to allow better access to environmental data held from NRW and Welsh Government.

### **11. How best should we communicate progress with delivery of our**

## **ambition?**

- Better use and support for the WBP website, Wales Biodiversity Week and continuation of the WBP Conference would be a good starting point.
- On a wider level the development of a communication plan tailored to different section of society e.g. academic community, policy makers and general public would help.

## **12. Related issues that have not specifically been addressed.**

- Profit forgone system should be replaced and a positive payment for benefits delivered system should be implemented.
- Wales should learn from examples such as the Burren Integrated Scheme.
- Everyone should be able to understand the importance of the uplands in supporting biodiversity, water and carbon storage, and be involved in the restoration of biodiversity, maintenance of good water quality and enhancing carbon storage within the Welsh Uplands.
- There should be a plan for the future of the uplands based upon the CCW Upland Framework.
- We should learn from past success and keep doing things that work. Not everything has to be new and innovative.
- Welsh Government must show commitment to the biodiversity duty and the conservation for Section 42 species and habitats on their own estate and consider strengthening the Biodiversity Duty and improving accountability within the Environment Bill.
- Welsh Government should create links with universities & NGOs to encourage demonstration farms in the uplands that should be centres of excellence, robustly testing the impact of alternative management options at different time-scales. Such facilities enable policy makers, land managers, practitioners and the public to see good results on the ground and develop their understanding of the key processes involved in achieving these. .



- Recognise technical experience and maximise the use of Ecosystem Groups and their inbuilt experience to identify and prioritise projects and programmes.
- Make better use of European instruments and structural fund programme to embed biodiversity into other work across Welsh Government's sphere of influence.
- Clarity on what is to be done between now and 2020 to reverse biodiversity loss and support nature recovery.
- Recognition that biodiversity is a key building block of the natural environment and action should be agreed in an apolitical timeframe.
- Welsh Government and its individual departments should have individual targets set for them to deliver and these should be audited regularly to measure progress and drive improvement. Biodiversity targets should be included as specific targets for staff performance.
- The Integrated Natural Resource Management approach in Wales should be based upon robust scientific evidence.
- The Wales Upland Forum and the Wales Biodiversity Partnership Upland Ecosystem Group should be merged to be the sole group giving advice and guidance on the Welsh uplands to the Minister, taking the lead on coordinating upland ecosystem resilience across Wales. This role should include maximising benefits to ecosystems across the uplands, through coordination of projects and programmes that affect upland ecosystems. The role should seek to balance benefits for local communities, local jobs, Section 42 species and habitats, carbon sequestration and sustainable food production as part of an Integrated Natural Resource Management Approach. If this is not possible or practical due to different remits then biodiversity and ecosystems expertise from the Wales Biodiversity Partnership Upland Ecosystem Group should be represented on the Wales Upland Forum.



**Dear Sir / Madam**

**NATURE RECOVERY PLAN for WALES:**

I object to the Nature Recovery Plan for Wales. The document is almost unreadable, and grammatically incoherent with vogue jargon and vague phrases which cannot be defined in concrete actions. It is not a plan.

Please see the detailed responses to your consultation questions below:

*1. Do you agree with the focus of the ambition on addressing the underlying resilience of our ecosystems and identifying and capturing benefits for society? If not, what else do we need to consider?*

No. The Plan fails to say why or even if the Wales Environment Strategy has failed or whether it is now abandoned. There is no objective analysis of the failure of existing legislation or strategic policy. I suggest that this maybe because of a failure in implementation, resourcing and enforcement and because non-environmental sectors (and Ministries) have not been required to engage in delivery. The focus on resilience is fine rhetoric, but difficult to define in practice and can only be demonstrated (or not) far into the future. It may be better to consider the restoration of structure and function to ecosystems (as enshrined in European legislation) which may be defined in regard to each ecosystem (see JNCC's Common Standards Monitoring).

*2. Does the ambition statement capture this new approach fully? What might be added?*

No. While a Strategy may be "high level" and aspirational; a "plan" should state clearly what is "planned" to be done. This document does not do that. Indeed, the Wales Environment Strategy has clearer aims and ambitions with time limited outputs to achieve.

*3. Are our goals the right ones? What might be added?*

Your ambition is "to reverse the decline in Biodiversity", but your target it "No Net Loss of Biodiversity". Stopping is not the same a reversing. Your goals are inconsistent and confused.

Your stated goal is "To restore degraded habitat at scale". This is grammatical nonsense. What scale? Large Scale? Small scale? No scale at all? I object to such a goal on logical grounds.

A Nature Recovery Plan should also embrace Geo-diversity. The equating of "Biodiversity" with "Nature" reflects a simplistic analysis of the issues. Geo-diversity and functional geo-systems such as coasts and rivers are often the underlying drivers of healthy ecosystems.

*4. Are the actions proposed right and adequate?*

It is far from clear what actions are proposed. There is certainly nothing that is measurable to a timetable. Given the failure to achieve the 2010 Biodiversity target the cynical would say that this is clearly a wise move! The only measurable actions are those quoted, in an Appendix, from the CBD Aichi Conference. It is not clear that WG is adopting these as its plan.

*5. What additional action would you wish to see?*

The plan should, as a basic minimum, adopt the Aichi goals and targets. There is no clear statement to that effect.

The plan should set clear targets for the control of Invasive non-native species in Wales, including Welsh seas. While existing legislation (if enacted) could address most of the other requirements for ecosystem recovery, new legislation may be required in this field, along with adequate long term resourcing.

*6. How do we engage with business more effectively to deliver our ambition?*

Regulation 30 of the Conservation Regulations (2010) requires Government to address the functional migration and movement features of the landscape; linear features and stepping stones. Implementation of this requirement through statutory development agreements (including S106 Planning agreements) with business, or through the creation of national habitat networks (as in much of Europe) would do much to address the ecological requirement for functional connectivity of habitats.

*7. How can we strengthen the way we work together?*

You should use the expertise embodied in the Wales Biodiversity Partnership. The deliberate sidelining of the work of the WBP in defining Biodiversity priorities by the Wales Nature Fund is scandalous. A year has been wasted in confusing navel gazing, thereby forcing unreasonable delivery targets on the recipients of a capricious decision making process. Money will be wasted as a result of the dash to deliver to impossible deadlines and opportunities have been lost to deliver acknowledged conservation priorities.

*8. How can we share budgets and look at integrated outcomes?*

One-year funding is of very limited value and leads to capricious actions, wastage, lack of monitoring and poor learning. Nature does not comply with the Government's financial year. Nature has been here for 4 billion years and has precedence; government should acknowledge that. A 5-year (or longer) planning and funding cycle is a reasonable period in which to deliver results.

*9. What else should be done to avoid duplication and to deliver our goals?*

Use the evidence and advice already available, such as the Wales Biodiversity Partnership, Local Record Centres, etc..

*10. How can we best use the Information Hub to collate and disseminate data and evidence?*

More recognition- and resourcing - should be given to Local Records Centres (LRCs) as the guardians of information. Consideration should be given to whether the charges for this data discourage its acquisition and application in decision making.

*11. How best should we communicate progress with delivery of our ambition, for example, by a three or five year work programme or an annual delivery plan?*

Reports should be presented on an annual basis against a 5-year plan, with clear measurable targets.

*12. We have asked a number of specific questions. Please let us know if you think there are related issues which we have not specifically addressed, and provide further information.*

You should explain why the Wales Nature Fund has taken 15 months and valuable environment sector energy in discussion of priorities when the Welsh Government' Wales Biodiversity Partnership has already advised on these matters and why, as a result, lucky recipients have only a few months to spend a windfall with no indication of future support.

Finally, Much could be achieved by the use of Plain English (and Welsh).

I trust these comments are helpful in guiding the Welsh Government's policy in this important area.

Yours faithfully.

Dr H C Wilson BSc., MSc., MA., PhD., MCPS.

2014-12-02

## Response Form

Your name: Colin R Cheesman

Organisation (if applicable): Plantlife Cymru (on behalf of Plantlife International)

email - [colin.cheesman@plantlife.org.uk](mailto:colin.cheesman@plantlife.org.uk)

telephone number: 02920 376193

Your address: 13 St. Andrews Crescent, Cardiff, CF10 3DB

## Preamble

Plantlife Cymru is part of Plantlife International, a charity established in 1989 to protect wild plants and fungi and to keep the colour in our countryside. Wild plants play a vital role in everyone's lives, cleaning our air and water and feeding and sheltering insects, birds and animals. Plantlife Cymru manages reserves, influences policy and legislation and works with others to promote, conserve and celebrate our wild plant heritage. We are the only international conservation charity working to conserve wild plants and fungi.

## Consultation Preface

### Key Messages

Plantlife welcomes the ambition of the Welsh Government to conserve and restore our wildlife heritage through the production of a Nature Recovery Plan and the actions disseminating from it. However we have a number of concerns about the current Nature Recovery Plan.

Firstly, we are disappointed that the Plan does not have those characteristics that we would have expected to have been present in a Plan, notably specific actions and changes that are allocated to a lead body so it is clear who is driving forward the Plan. There are no time frames for any of the existing actions contained in the Plan many of which are driven by process rather than action on the ground or through developing and integrating policy and legislation. The Plan also fails to identify what resources are required, primarily because it is Strategy rather than a Plan and whilst it recognises the need for communication and engagement, which we support, it is unclear about audiences, the tools and method of engagement and the messages required. We would encourage you to move forward with producing an Action Plan as the next priority rather than Communication and Evidence Plans.

We are not convinced that Natural Resource Management will deliver within the timescales required in order to not only meet the Aichi Targets, but, for many of our threatened species, to prevent catastrophic loss and extinction. Whilst we recognise the value of integrated natural resource management and its development, there still needs to be a programme of species and habitat conservation and management underpinned by monitoring, strong scientific evidence and research. With increasingly limited resources across all sectors in the environment we need to focus our efforts where they will

generate the best outcomes for wildlife and for people. Getting bogged down in a new process that has no track record of success is as dangerous for our reputations as it is for our wildlife.

The obligations at international, national and local level that the Wales Government and local authorities are signed up to are made in order to conserve our biodiversity. That they may appear onerous is due to our failure to act in the past to work effectively in partnership and to consistently resource action to conserve species and habitats. The Nature Recovery Plan should be a vehicle for action now and in the immediate future if we are to meet the Aichi Biodiversity Targets by the deadline of 2020. We are concerned that the Plan lacks actions that are SMART and which will deliver for biodiversity within that timescale.

### **Other general observations**

The need for a Nature Recovery Plan was exemplified by the production of the State of Nature Report in 2013 and indeed it needed to meet the challenges outlined in that Report. For wild plants there was sufficient data at that time to indicate that one in six plants in Wales is under threat.

The Wales Government has international commitments under the Convention on Biological Diversity which is detailed as an annex to the Plan and, following the sixth Conference of the Parties in 2001, to the Global Strategy for Plant Conservation (GSPC) which we were disappointed to find was not referenced in the document.

The need for protection of our species and habitats is important for our wildlife. We view with concern any action that would seek to diminish this protection either through legislation or review. But protection alone will not be enough and the ambition of resourcing proper conservation management on designated sites and for species and habitat restoration in the wider environment has not been met by the Plan.

We are also concerned at the lack of reference of the importance of agriculture, which occupies 84% of the land mass of Wales, in delivering for biodiversity and ecosystems and the need for Glastir to deliver on this front. Surveys indicate that 95% of the threatened wild plants in Wales occur on farmed land so it is essential that agriculture plays its part. The Glastir agri-environment scheme will not deliver for our wild plants as outlined in our report, 'And on that Farm', published in 2014.<sup>1</sup> The Nature Recovery Plan must act to amend Glastir in order for it to deliver.

We remain concerned about the level of integration between the various Bills in development and the Nature Recovery Plan. The Well Being of Future Generations (Wales) Bill, the Environment Bill and the Planning (Wales) Bill need to reflect the aspirations of the Nature Recovery Plan and have species and habitat conservations as one of the core drivers.

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<sup>1</sup> [http://www.plantlife.org.uk/publications/and\\_on\\_that\\_farm\\_he\\_had\\_wales\\_farmland\\_report](http://www.plantlife.org.uk/publications/and_on_that_farm_he_had_wales_farmland_report) (2014) Plantlife

## Consultation Questions

1. Do you agree with the focus of the ambition on addressing the underlying resilience of our ecosystems and identifying and capturing benefits for society? If not, what else do we need to consider?

No.

The aspiration of the Welsh Government to focus on ecosystem resilience through the development of natural resource management as the principal mechanism by which to carry out nature conservation is of concern. This would entail a significant and substantial cultural shift in environmental management and thinking in the medium term. We will need a range of options available if we are to play our part in achieving our international, national and local obligations. Mechanisms such as site management and protection, species conservation measures and proper monitoring will also need to be used for species and habitats that have been identified as rare and threatened. Nature needs to be integrated into current legislation and spatial planning in a similar way that we integrate the needs for people, transport, housing and employment.

We also disagree that the focus of nature conservation effort should be directly linked to benefits to society. Where benefits do occur then these are to be welcomed and encouraged but they must not be the *prima facie* case for conservation action. For many, the idea of valuing nature in return for the services it provides is both unfamiliar and anthropocentric. It risks alienating important voices and activists in the vital role of conserving and recording our natural heritage and diverting effort into explaining and 'selling' the concept of ecosystems services and natural resource management. For many there is no value than can be placed on the beauty of a Lesser Butterfly Orchid or wild Chamomile for example. Indeed it is a much deeper sense of guardianship and the need to conserve our wild plants so that future generations may enjoy and be inspired them that motivates many conservationists rather than the ecosystem services that derive from their conservation.

Linking biodiversity with benefits to society can also result in artificial commodification of species/habitats dependent on the needs of society. Furthermore, that perception of need may vary between parts of our society and communities resulting in a confused and incomplete picture. This will also place a financial value on wildlife and/or natural processes which, whilst it may be a useful way of presenting arguments and engaging business and government in looking at particular schemes, the methods for doing this are not yet clear cut, widely understood or applied. The more difficult inherent and cultural values associated with wildlife and landscapes will have more resonance with people.

The Nature Recovery Plan must remain focused on protecting and restoring our biodiversity for its own intrinsic sake whilst recognising the benefits that nature and its many processes and functions make to our prosperity and well being.



## 2. Does the ambition statement capture this new approach fully? What might be added?

We would like to see the ambition statement reflect the existing ambitions enshrined in the Aichi Biodiversity Targets *“to halt and reverse the loss of biodiversity and the degradation of ecosystem services by 2020, and that by 2050, biodiversity is valued, conserved, restored and wisely used, maintaining ecosystem services, sustaining a healthy planet and delivering benefits for all people.”* Building resilience and using natural resource management are just two of a number of tools that could, if proved effective, work towards the ambition.

## 3. Are our goals the right ones? What might be added?

The goals set out in the Plan need to be more focussed, clearer, measurable and time-defined.

We would point out that not all habitats in Wales exist ‘at scale’ and therefore the challenge is to conserve the existing resource and seek opportunities for expansion and re-creation where there are suitable opportunities. For example the document misleadingly refers to ‘a complex mosaic of species-rich meadows’ on page 6, but 97% of these meadows have been lost in the last 60 years and only 1,700 hectares of these meadows exists<sup>2</sup> often in isolated locations. Other habitats such as upland and lowland calcareous grassland, lowland raised bog, limestone pavement and coastal vegetated shingle also only survive in fragmented and small units<sup>3</sup>. We would suggest that the ‘scale’ must be to create mosaics of habitat that encompass small and threatened habitat types.

The Plan needs more specific goals that relate to the restoration, protection, enhancement of wildlife habitats and the consolidation and expansion in both range and population of species. At a landscape scale there needs to be goals of mosaics of habitats and species and connectivity in order to deliver resilience. Much useful work has already been done by CCW/NRW in identifying connectivity e.g. Ecological Connectivity and Biodiversity Prioritisation in the Terrestrial Environment of Wales<sup>4</sup> and Towards a Woodland Habitat Network for Wales<sup>5</sup>.

There must be goals that address the negatives causing biodiversity loss. These are detailed in Annex 1 but we would point out that many relate to the farmed landscape. Other factors include habitat fragmentation and loss of connectivity, habitat loss, invasive species and pollution.

There should be a goal to give NRW responsibility for measuring the losses and gains of biodiversity. As the State of Nature report amply illustrated there are many areas where there is insufficient empirical data to assert the loss or gain in Wales. There needs to be support for long term monitoring of biodiversity including the use of citizen science. In

<sup>2</sup> Jones PS, Stevens DP, Blackstock TH, Burrows CR & Howe EA (2003) Priority Habitats of Wales, CCW.

<sup>3</sup> Jones PS, Stevens DP, Blackstock TH, Burrows CR & Howe EA (2003) Priority Habitats of Wales, CCW.

<sup>4</sup> Latham J, Sherry J & Rothwell J (2013) Ecological Connectivity and Biodiversity Prioritisation in the Terrestrial Environment of Wales, CCW

<sup>5</sup> Watts K, Griffiths M, Quine C, Ray D & Humphrey J (2005) Towards a Woodland Habitat Network for Wales, CCW

partnership with BSBI and CEH we will be establishing the National Plant Monitoring Scheme in Wales in 2015 in order to identify trends in plant populations.

We are uncertain what 'highest quality environments' means and would suggest that whilst some terrestrial and marine areas have conservation designations that might qualify them as highest quality, there is a need to manage all land and marine areas for biodiversity especially if the ambition is to provide greater resilience in the environment. Operating at a landscape scale helps meet Target 6 of the GSPC and Target 7 of Aichi.

There needs to be recognition that the management and recovery of species does not directly follow habitat management. For each habitat there will be a number of dependent species each of which will require specific conservation management. For example Three-lobed Water Crowfoot, *Ranunculus tripartitus*, (s42 species) is found on wet heaths but needs disturbance through grazing animals or vehicles in order to survive. Such specific species requirements may not be addressed by a more landscape scale approach to habitat conservation.

The Plan needs to say what the relationship is between Natural Resource Management and the existing Local Biodiversity Action Plans. There will be a need to integrate the Local Biodiversity Partnership network within the Natural Resource Management Area Plans process with the proviso that inherited biodiversity actions are SMART and are costed.

In providing a strong evidence base, supporting Wales Government, NRW and local government in meeting their NERC biodiversity duties, in support eNGO's and individual recorders and in promoting biological recording in Wales there needs to be a goal of sustaining the national coverage of Local Environment Record Centres and encouraging great collaboration.

In determining no net loss it will be important to address the issue raised earlier of measurement through Natural Resources Wales.

The framework of governance does not go far enough. Delivery of the Nature Recovery Plan will involve a wide range of public, third sector and business partners working in partnership. The current arrangements are cumbersome, inefficient and dominated by the Wales Government. There needs to be a merger of sub groups under the Wales Biodiversity Partnership (WBP), the Wales Environment Partnership and the Pollinators Taskforce. There needs to be more targeted work plans for the new groups with definite outcomes that meet the aspirations in the revised Nature Recovery Plan. The Wales Biodiversity Strategy Board needs to be more inclusive and open, for example by publishing its agenda, papers and minutes on the WBP website.

We note that the intention to put in place specific measures and targets for the final agreed goals, however this reinforces our view that this draft Nature Recovery Plan is not a Plan but a document setting out the principles for nature recovery.

#### **4. Are the actions proposed right and adequate?**

The actions proposed are not SMART, they need to reflect the comments above on the goals from which they are derived (Section 3); they need to recognise the need to

conserve species and habitats as a fundamental part of ecosystems and need to be more focussed on delivery against the Aichi Biodiversity Targets.

### **5. What additional action would you wish to see?**

Targets and actions for species conservation, habitat conservation and restoration and site management should be at all levels, not simply confined to SAC/Natura 2000 sites.

The purpose in the review of designated sites made transparent. Our view is that all designations reflect the best examples of habitats and protection for species internationally, nationally and locally. If anything NRW and its predecessor organisation CCW were slow to designate SSSI's e.g. Coity Mountain, Blaenavon & Coed Garth Gell, near Dolgellau.

That targets are set for the SSSI network to be in favourable or recovering condition and that an analysis of resources required to achieve this is undertaken. In England the RSPB and the Wildlife Trusts have suggested 80% of SSSI's in favourable condition by 2040.<sup>6</sup> Wales should match that ambition.

Funding should be stable and long term, not stop start like the Nature Fund and the Resilient Ecosystem Fund (REF). We would like to see any future funding mirror the system and methodology of the REF and, indeed, its excellent administration by CCW/NRW.

### **6. How do we engage with business more effectively to deliver our ambition?**

For many businesses, the environment is a key part of their business. The 2007 report into the Wildlife Economy of Wales indicated that it contributed nearly £2m to the Welsh economy and employed over 30,000 people<sup>7</sup>. To engage further with businesses there needs to be clearer messages of the value of biodiverse environments to employers and employees and for industry to play its part through corporate social responsibility.

### **7. How can we strengthen the way we work together?**

Wales Government needs to put more value and effort into building partnerships. The eNGO sector in Wales is only too willing to enter meaningful partnerships to deliver for species and habitat conservation. It is only through effective collaboration that progress will be made. In doing so Wales Government needs to recognise the value of being inclusive in order to capture the enthusiasm and knowledge of a wide range of organisations and not be afraid of 'critical friends' who share the same ambitions.

### **8. How can we share budgets and look at integrated outcomes?**

Budgets are already 'shared' between eNGO's and NRW through Partnership Agreements and the Competitive Fund. If Wales Government wishes to share resources then there will be a need for greater transparency over what resources it has to spend in areas that are relevant to the Nature Recovery Plan and how it will engage fairly with partners in adding value to those resources.

<sup>6</sup> Benwell R, Burfield P, Hardiman A, McCarthy D, Marsh S, Middleton J, Morling P, Wilkinson P and Wynde R (2014) A Nature and Well Being Act Briefing, RSPB & The Wildlife Trusts

<sup>7</sup> National Trust Wales on behalf of Valuing Our Environment Partnership (2007) 'Wildlife Economy Wales': An Economic Evaluation Scoping Study

**9. What else should be done to avoid duplication and to deliver our goals?**

By sharing our ambitions, work plans and working more closely. By making sure that we work effectively and not duplicating resources - see 10. below.

**10. How can we best use the Information Hub to collate and disseminate data and evidence?**

The role of the Information Hub is not clear and we would welcome clarification. What role does it serve that is not already being undertaken or could be undertaken by the Wales Biodiversity Partnership? If it is simply a gateway to knowledge, resources and funding then we believe that more support should be given to WBP to achieve this rather than establishing another body with all the duplication of resources that requires and the confusion that would entail.

**11. How best should we communicate progress with delivery of our ambition, for example, by a three or five year work programme or an annual delivery plan?**

You should set out a five year work programme that shows progress towards the Aichi targets and then report annually on progress.

**12. We have asked a number of specific questions. Please let us know if you think there are related issues which we have not specifically addressed, and provide further information.**

The Plan needs to recognise the importance of species as the very building block of ecosystems and the services that they can provide. This is reflected in Target 12 of the Aichi Biodiversity Targets. We are disappointed that this is not understood within the Plan.

Responses to consultations are likely to be made public, on the internet or in a report. If you would prefer your response to remain anonymous, please tick here:



**Welsh Ornithological Society**  
**Cymdeithas Adaryddol Cymru**  
[www.birdsinwales.org.uk](http://www.birdsinwales.org.uk)

Secretary  
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Phone: 01352 750118  
2 December 2014  
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Biodiversity and Nature Conservation Branch  
Rhodfa Padarn  
Llanbadarn Fawr  
Aberystwyth  
Ceredigion  
SY23 3UR

Dear Sir

### **Nature Recovery Plan for Wales**

#### **A response from the Welsh Ornithological Society**

The Welsh Ornithological Society (WOS) is a membership organisation that promotes the conservation of birds and their habitats across Wales. The Society encourages the study of wild birds and a high standard of bird recording in Wales through its publications, annual conference and grant scheme.

WOS welcomes the opportunity to comment on this important document. Research carried out by our members and affiliates, and published in our Journal (Birds in Wales), shows a continuing decline in many species across the whole range of Welsh habitats. This is reinforced by the findings of the recent BTO Atlas and the State of Nature report. The Welsh Government has an international commitment to halt this decline by 2020 – this is only 5 years away and WOS is concerned that it will be very difficult to meet this target, never mind see the start of population recoveries.

WOS is very disappointed by the consultation document. It is written in a form that is difficult to follow and does not seem to understand basic ecological concepts. We are concerned there is no 'plan' just a vague aspiration to use 'Natural Resource Management' to achieve vague aims. The language seems to emphasise resource use rather than nature recovery.

WOS endorses the points raised by RSPB Cymru. Namely:

- We need a fully funded plan of action that meets nature's needs. Welsh Government thinks our wildlife will recover because a new approach called "Natural Resource Management" will integrate policies and plans to change the way people work across the environment in Wales. This process may go some way to help, but on its own it is not enough, and the consultation provides no evidence that this approach will work. We are concerned that for some species, extirpation from Wales may come before it will be possible to assess the delivery of Natural Resource Management.
- Improving our network of special places and most threatened and precious wildlife is essential. We need Welsh Government to invest in restoring our special sites and priority species and habitats. Our sites must

**President: Iolo Williams**

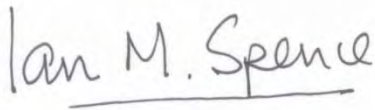
be bigger, better and more connected and our threatened and precious wildlife restored. Commitment to improving these crucial nature conservation tools in the Nature Recovery Plan is essential.

- Investment in scientific evidence is essential. We need to be able to see what's working and what's not – monitoring the condition of sites and trends for a full range of species and habitats is essential. This helps us see nature's needs and ensures we're using the right tools for the job. We can't restore the nature we've lost if we can't see what we're doing.
- Welsh Government must show strong leadership and ambition by making it law to achieve nature's recovery. We need the Environment (Wales) Bill to enshrine in law long-term legally binding targets that promise to reverse declines in nature. We need the law to also declare it a duty of all public bodies "to further the conservation and enhancement of biodiversity" in their activities. This will give nature recovery the power it needs to succeed.

WOS considers that this last point is very important – there must be legally binding targets where the Government can be held to account if they do not deliver. If they are not prepared to do this it shows very little commitment to Nature.

WOS is happy to work with Welsh Government to deliver a real plan for recovery of Welsh Nature and would be happy to meet with you to discuss this.

Yours faithfully

  
Ian M. Spence

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## Consultation on the Nature Recovery Plan for Wales

### Response from The Crown Estate

November, 2014

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#### 1. General Comments

The Crown Estate welcomes the opportunity to respond to this consultation on the Nature Recovery Plan. We are broadly supportive of the approach to integrate a number of different policy mechanisms in order to ensure sustainable natural resource management.

We previously contributed to the development of the Welsh Government White Paper "*Towards the Sustainable Management of Wales' Natural Resources*" and as part of this requested consideration of a broader definition of natural resources. The White Paper referenced natural resources as "air, water and soil"; whilst the second part highlighted "geologic" resources. We made two comments that would wish to be considered here;

- The reference to soil being changed to sediment/ minerals to more accurately reflect the range of natural resources to be considered as part of the proposal;
- To further consider "air" and "water" in terms of their use as natural resources. Both "air" and "water" can be considered as a resource for energy as they could be utilised as wind, tides or waves, as well the use of water more broadly through energy production/processes.
- These natural resources are of great value to industries and other users, therefore when we describe the use of natural resources below, we do so in the context of the broader definition.

We will continue to work with the Welsh Government and Natural Resources Wales in seeking to ensure sustainable resource management in the context of the land we have responsibility for.

#### 2. Introduction

The Crown Estate welcomes the opportunity to respond to this consultation on the Nature Recovery Plan for Wales. This response is informed by The Crown Estate's experience of managing activities within the marine environment and, within its core remit, of balancing economic activity with stewardship of natural resources for future generations to use and enjoy. The Crown Estate can bring to bear a high level of knowledge and expertise on issues relating to the management of the foreshore, the territorial seabed and continental shelf, and we are committed to working with the UK and Devolved Governments and all stakeholders on issues that affect these areas.

Our Welsh portfolio is diverse, including our rural estate; substantial areas of common land, agricultural holdings and a range of mineral interests. Our marine portfolio takes in around half of the foreshore and the seabed out to 12 nautical miles, where we work with a number of industries such as; the marine aggregates industry, telecommunications and offshore developers to realise the potential for renewable energy. In managing our Welsh portfolio we aim to work in partnership with government and local communities for mutual benefit. We



have built good working relationships with the Welsh Government and the National Assembly for Wales, local councils, communities and our own customers and welcome the opportunity to contribute data, information and expertise into the strategic management of natural resources that the Welsh Government is leading on.

Having reviewed the plan, we have included some specific comments against the questions set out in the consultation. In some instances we have grouped the questions where the answer is applicable to more than one:-

### **3. Consultation questions**

Question one: Do you agree with the focus of the ambition on addressing the underlying resilience of our ecosystems and identifying and capturing benefits for society? If not, what else do we need to consider?

Question two: Does the ambition statement capture this new approach fully? What might be added?

- The Crown Estate supports the ambition to build resilient ecosystems through effective natural resource management. We welcome the pragmatic approach to managing natural resources sustainably through ensuring an integrated approach.
- We are encouraged by the reference to mechanisms by which integrated natural resource management will be achieved; in particular the Marine Strategy Framework Directive (MSFD) and the Welsh National Marine Plan. Whilst we recognise that the latter will be one of the strategic actions for delivery of natural resource management, we are keen to understand how the integration of the mechanisms will take place in practise in due course.

Question three: Are our goals the right ones? What might be added?

Question four: Are the actions proposed right and adequate?

Question five: What additional action would you wish to see?

- The Nature Recovery Plan, along with the Marine Transition Programme, is recognised as the policy instrument that will enable sustainable resource management. It may be helpful to set out in the plan how these will interlink with the statutory instruments, such as the developing Environment Bill and State of Natural Resource Report and eventually the National Nature Recovery Policy (NNRP) including their timelines for development and how they will interplay.
- We are supportive of the goals and actions set out in the Plan but note that it would be helpful to include the consideration of the resilience of biodiversity with respect to the need to adapt to climate change as this specifically seems to be absent.
- We support the approach to taking action through evidence, research, monitoring and surveillance and wish to emphasise that baseline data will be essential in order to determine the impacts of specific pressures on biodiversity. We believe that how this baseline data will be gathered and the assessment of pressure would be a useful inclusion.
- We are continuing to work with Natural Resources Wales and others on the sustainable management of the rural land in which we have responsibility for and we welcome the approach on working with partners in utilising the Rural Development Programme for integrating “nature on the ground”.



- The review of designated sites and species is referenced in the consultation as is the fact that the Welsh Government will set clear objectives for the European designated Natura 2000 network in the NNRP. Whilst the Marine Transition Programme is mentioned, it is not clear how the review of designations offshore will link in to the NNRP review activities and what the framework would look like. It would be helpful to see how they align in order for stakeholders to understand which mechanisms are best to provide data and contribute to the process.

Question six: How do we engage with business more effectively to deliver our ambition?

Question seven: How can we strengthen the way we work together?

- Given the number of initiatives and activities businesses are involved with, it will be really helpful to set out as early as possible a clear and transparent stakeholder engagement process highlighting opportunities for stakeholders to be involved in the process;
- It will be important to ensure thorough representation across all relevant industries that use natural resources. Industry representative organisations can provide central points of contact for a number of specific businesses;
- Providing clear mechanisms for engagement and sight of which organisations are engaging with both the Welsh Government and Natural Resources Wales will help industries to coordinate their contributions to plan development and should strengthen the way in which all stakeholders can work together to reach an optimal position;
- We would also encourage the use of existing established forums (such as Wales Marine Strategic Advisory Group) to feed into the development of the plan.

Question eight: How can we share budgets and look at integrated outcomes?

- We have no comment on budgets but support the fact that integrated outcomes (deriving multiple benefits that meet objectives for a number of organisations/interests) should encourage partnership contributions to action delivery.

Question nine: What else should be done to avoid duplication and to deliver our goals?

- We would suggest that the Welsh Government and Natural Resources Wales should continue to have strategic oversight of all the goals and strategic actions linked to natural resource management, both on land and marine, in order to drive efficiencies and avoid duplication where possible.

Question ten: How can we best use the Information Hub to collate and disseminate data and evidence?

- In launching any new information hub it would be useful to clarify how it will link to other information sources such as Welsh Government's marine planning portal as well as other existing sources of data that could add value.

Question eleven: How best should we communicate the progress with delivery of our ambition, for example, by a three or five year work programme or an annual delivery plan?

- No comment.

Question twelve: We have asked a number of specific questions. Please let us know if you think there are related issues which we have not specifically addressed, and provide further information.

- No further comments.

#### **4. Conclusion**

We trust that you will find these comments constructive. We would be very willing to provide additional information on any of the points we have raised above and be very pleased to discuss these matters with you further. We are ready to engage in further discussions on these and other points relevant to our ownership or which our expertise may be brought to bear. All of this response may be put into the public domain and there is no part of it that should be treated as confidential.

#### **5. Contact:**

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