

Consultation on the Nature Recovery Plan in Wales

10 September 2014 - 3 December 2014

Consultation Responses 81 – 100

Ref. 0081 - Bridgend Biodiversity Partnership

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 support and welcome the overall focus and ambition, to reverse the decline in biodiversity, through building resilience of our ecosystems.

The report defines Resilience, when applied to ecosystems, as the ability of an ecosystem to withstand, or recover from disturbance and its capacity to survive and adapt so that its biological diversity, natural processes and provision of ecosystem services are maintained.

However, the underlying biodiversity must be a focus for action through protection and enhancement from which ecosystem services will be provided.

One of the aims of the plan is to fulfil Welsh Governments requirement to have in place a national biodiversity strategy and action plan by 2015. Whilst the plan provides a strategic approach it does less to fulfil the commitment to provide an Action Plan. We recognise that the Welsh Government may not be best placed to develop and action plan and welcome the recommendations of a framework of governance to support delivery, working together across sectors. The current system provides a basis of that and the Wales Biodiversity Partnership and associated ecosystem groups are best suited to advise area-based groups on developing action plans that represent this framework.

The Bridgend Biodiversity Partnership have taken a similar approach. Building on the importance role of designated sites for safeguarding biodiversity, the partnership acknowledge the importance of a catchment scale, ecosystem service approach needs to be undertaken to reverse the decline by linking up a currently fragmented network of designated sites. Ecosystems are a web of complex interactions of a number of factors including biodiversity, geology and human influence and the revised Local Biodiversity Action Plan (currently under revision) reflects the ecosystem services approach and commitment to nature conservation in Bridgend.

The LBAP recognises that the rich biodiversity of the County Borough of Bridgend supplies a wealth of different benefits to the environment, people and the economy

of the area. It provides recommendations for how biodiversity and the ecosystems in the Borough can be enhanced and also increase their value to society.

We think it is important to enhance the resilience of the existing ecosystems especially where there is complimentary benefits to society. However, the nature Recovery Plan ambition also includes focusing on effective natural resource management. The language used in the document surrounding natural resource management appears to put aside the intrinsic value of biodiversity to highlight the natural environment as a resource to exploit. We would like to caution that a purely exploitative approach will result in unsustainable land use and will decrease the resilience of existing ecosystems it is proposed to protect.

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

On P.13 reference is made to S42 of the NERC act. However, and of equal importance is S40 - Every public authority must, in exercising its functions, have regard, so far as is consistent with the proper exercise of those functions, to the purpose of conserving biodiversity.

In order to get effective cross -sector buy in e.g. health, social wellbeing, community and therefore effective benefits to society through effective ecosystem service delivery, a wish and need to work with other sectors needs to be one of the ambitions also. This should be carried through by the Future Generation bill.

As mentioned above, the ambition statement proposes focusing on effective natural resource management as a delivery mechanism for resilient ecosystems.

Natural Resource Management is defined as the application of an Integrated approach to sustainable management of natural resources by building the resilience of natural resources and the services they provide.

The plan does not define natural resources, but refers to definitions in the environment bill. On first reading of this consultation it is easy to mistake natural resources as a term to represent well understood concepts of nature, 'biodiversity' and ecosystems. In addition at the recent Wales Biodiversity partnership conference 2014, a representative of Welsh government indicated that the term integrated natural resource management was used to replace the term ecosystem approach as it is supposed to be more easily understood by lay persons. We suggest that care should be taken when using these terms as replacements for more established well known terms used in the scientific and professional communities.

Definition In the environment bill:

Natural resources, in relation to Wales, extends to the following matters relating to the sustainable management of natural resources:

- a) air, water and soil;
- b) geologic and landscapes;
- c) biomass and biological resources; and
- d) ecosystems”

Sustainable management means the collective actions (including non-action) required for managing the maintenance, enhancement and use of natural resources in a way, or at a rate, which will enable the people and communities of Wales to provide for their social, economic and environmental well-being, while maintaining the life-support systems of nature. In doing so, ensuring that the benefit of the use to the present generation does not diminish the potential to meet the needs and aspirations of future generations.

Sustainable management of natural resources is the output of the process of integrated natural resource management.

“Integrated natural resource management means a planning and priority setting process that coordinates the maintenance, enhancement and uses of natural resources so that the long term benefits are optimised for the people, environment and economy of Wales in the present and in the future.”

This is an ambitious integrated approach to land management in Wales and the Welsh Government should be congratulated on their boldness in attempting to tackle this approach. The proposed environment bill should therefore ensure that biodiversity and ecosystems are an essential part of the sustainable development implantation across all directorates and for all public bodies. The nature recovery plan is a part of this process however. Its role should be to promote the intrinsic value of biodiversity and champion its ecosystem benefits within the larger integrated natural resource management approach. Currently there is no reference of the plan in the Environment Bill. Therefore in order to meet the ambition, should reference to the plan be made in the environment bill and made an integral part of the decision making process?

We welcome the ambitious approach and require strong leadership from Welsh Government to realise the ambition. However, the ambition should also recognise a bottom up approach to ecosystem service delivery. Local on the ground actions will be an important part of the process. Furthermore, as budgets become tighter, communities are being asked to be more involved and take ownership of community facilities, green open spaces, etc. while many environmental delivery groups who support initiatives such as this are being lost. This does not come across in the explanation of the ambition.

Biodiversity underpins ecosystem goods and services, and the nature recovery plan

provides an opportunity to address the underlying causes of biodiversity loss by mainstreaming biodiversity across all sectors of government and society through sustainable natural resource management.

The integrated natural resource management approach as defined in the environment bill seeks to ensure the long term benefits are optimised for the people, environment and economy. Whilst there are many schemes that will maximise social, economic and environmental benefits there will be conflicts too.

The nature recovery plan is dependent on evidence gathering, to understand ecosystems and the services they provide and how they can be made more resilient. This is extremely important where conflict arises and decisions have to be made against economic and social outcomes. Will the resources be provided to build this evidence base? Where effect of decisions is unknown will a precautionary approach be taken acknowledging the importance of a healthy functioning ecosystem in all decisions taken, including major economic and nationally important projects through the integrated natural resource management approach?

Are our goals right ones? What might be added?

The goals proposed reflect much more what is expected in a biodiversity strategy/ nature recovery plan. It is important that these goals are not lost in the integrated natural resource management approach.

One goal seeks to improve our highest quality habitats. Whilst they may be covered by the goal to improve degraded habitats at scale, lower tier sites e.g. local nature reserves, country parks, wildlife sites/SINCs also have a role in terms of acting as wildlife hubs albeit maybe at local and regional level and provide informal recreation opportunities. Therefore, their value in terms of ecosystem service delivery shouldn't be underestimated.

We agree with the goal to achieve 'no net loss' of biodiversity however this is a generic statement. There is already the overall ambition to reverse the decline in biodiversity to make resilient ecosystems. This goal is more ambitious than the ambition? Also specific measures and targets for the final agreed goals are to be produced, therefore the goals should be measurable. Biodiversity is the word we use to describe the whole variety of life that exists on earth. It includes all animals, insects, plants, fungi and bacteria and the complex habitats and ecosystems which they form. It also includes the genetic diversity of all these organisms.

Final goal To put in place a framework... needs to recognise the input of local communities into assisting with delivery

The integrated natural resource management approach works well at large catchment scale. From a local authority perspective much of the opportunities for biodiversity benefit which is often overlooked in decision making processes is within

the urban areas. This is also true of opportunities to engage with local communities and increase societal awareness. There are many small scale opportunities such as local parks, Sustainable Drainage Systems etc. which can be implemented immediately with the correct policy support and as drivers for grant funding. In Bridgend CBC we have identified the importance of the natural environment to health and wellbeing, community cohesion, economic regeneration as well as enhancing biodiversity and making the urban ecosystem more resilient and are championing a green infrastructure approach.

We recommend a more explicit goal e.g. To integrate biodiversity into all levels of decision-making e.g. through ensuring sustainable management of natural resources. Or To integrate and mainstream green infrastructure into all decision-making. This goal should link with the existing biodiversity duty S40 - Every public authority must, in exercising its functions, have regard, so far as is consistent with the proper exercise of those functions, to the purpose of conserving biodiversity.

Are the actions proposed right and adequate?

Need to emphasise cross -sector working more as per above point relating to the ambition statement. This is fundamental to effective ecosystem service delivery and is lost in this section a little.

Elaborate on community engagement Focus for Action as you have for the other actions.

Actions should be deliverable and targeted and reflect the INRM approach, no mention of it with the focus for action? For example in the Focus for Action section a) an important part of the evidence gathering will be to identify ecosystem service provision as well as the ecosystems. But we welcome the approach to focus action based on evidence and research.

c) There appears to be a caveat that only priority species and habitat that society wishes specifically to see benefit from improvements to our ecosystems will be maintained? We are not sure how this would be measured, ecosystems are complex and largely unknown entities, a lot of evidence gathering and research would be required to identify and exclusively protect these species and habitat to the detriment of others which may not be so well understood. Where habitats and species are not proven to provide societal gain this caveat suggests that the plan moves away from recognising the intrinsic value of biodiversity.

Under the strategic actions –

Funding our partners – will the RDP funding be based on integrated Natural Resource Management Approach and evidence and research gathered as part of this process?

The nature fund identified an appetite for cross-sector collaborative working. The historical partnership grants provided by NRW are essential in providing the local authority with the ability to undertake work/projects which benefit nature conservation and the objectives of NRW and WG. These grants are proven examples of successful collaborative delivery as the local authority often uses the grant to support local biodiversity partnership members to undertake projects in the Borough. Without this grant funding existing partnerships developed over many years may be at threat.

Local Biodiversity Partnerships are often led by local authorities, funding provided to the local authority to ensure collaborative action through these groups would be an important step to delivering action on the ground. In addition the WBP ecosystems groups are also good conduits for disseminating funding.

Identifying financial instruments – this is an important strategic action for investment and for the sustainable management for ecosystem services. We welcome the investment in Green infrastructure. However, NRW and WG do not provide a definition of green infrastructure. There are many opportunities for management of water and carbon particularly in upland areas. However, enhancement of some ecosystem services could be in conflict with current land management and cultural practices. Schemes based on simple principles such as planting trees for carbon sequestration must seek local advice to ensure that the scheme does not conflict with current habitat management and is the most appropriate habitat to maximise ecosystem service provision in that area. National funding schemes should consult with local practitioners who have an intimate knowledge of the landscape, local biodiversity partnerships should be consulted on these schemes.

Payments for Ecosystem Services should only be considered where they enhance a habitat/ ecosystem and provide a net gain and should not be considered as part of a Biodiversity offsetting scheme which is a completely different approach and would work against the principles of the integrated natural resources management approach.

Bridgend CBC welcome the chance for investing in the landscape to provide social, economic and environmental benefits that also stimulate green growth.

Review designated sites and species – It is stated that the Welsh Government will set clear objectives for the designated Natura 2000 network in the statutory National Natural Resource Policy. The actions in this plan provide an opportunity to guide these objectives and should highlight the biodiversity interest of these sites when applying the integrated natural resources management approach. The plan should also emphasise that any changes in the legal framework to remove conflicting objectives will always seek to ensure the favourable conservation status of the key habitats and species. For example, ecosystem services should be maximised on Kenfig Nature reserve. However, planting the dune system with trees to offset

carbon production of the nearby steel works would not be appropriate for the features of that site.

Improving the evidence base – Bridgend CBC have in partnership with NRW identified ecosystem service provision for the whole of the county borough. This evidence base should provide the basis for all works in Bridgend County Borough by Welsh government through the integrated natural resources management approach. The evidence base forms the backbone of the reviewed local biodiversity action plan to ensure that nature conservation actions in Bridgend are designed to enhance connectivity of habitats and ecosystems whilst maximising their ecosystem service provision. The LBAP is structured to follow the landscape character areas to ensure biodiversity and habitat creation is sensitive to the cultural landscape.

Since this information is currently available following the integrated natural resources management approach we would expect this information to be included in area based plans and to influence the delivery of Welsh Government schemes such as Glastir and the future management of the woodland estate ensuring maximum benefit for the residents of Bridgend.

Bridgend CBC welcome resources from Welsh Government to continue this approach for continued research and evidence gathering to maximise sustainable natural resources management of Bridgend County.

What additional action would you wish to see?

Promoting and disseminating good practice and delivery. Utilising the existing ecosystem groups to comment on and ensure ecosystem service delivery. This would need to have some form of budget attached to administer and assist with delivery. This could be linked to the funding opportunities identified.

There is an action for communication and engagement at the local level with members of the public. Most members of the public, local authority members, officers etc. work and focus much of their time within the settlement boundaries. It is considered that people will feel removed from the landscape scale natural resource management approach being recommended in this plan and as a result will be difficult to engage with these people.

The green infrastructure within urban areas is incredibly important for local people, wildlife and 'getting the message across' with respect to ecosystem services. WG is responsible to the tax payer and it is difficult to make the connection how works can benefit individual members of the public when it is undertaken outside of people's communities.

It is the small pockets of green space within the settlement boundary that can have immediate impact on people's lives, though the provision of multifunctional accessible natural green space. These green spaces can also assist in alleviating

flooding and have benefits to health, reducing pollution, biodiversity enhancement, community cohesion and as a means of boosting the economy. Bridgend CBC has made a start by developing a Green Infrastructure Approach, encouraging developers to maximise green assets and biodiversity on their site through multifunctional solutions.

This may be addressed within the action providing better governance to benefit nature strategic action. However, a lack of funding to produce action on the ground has resulted in many environmental groups such as Groundwork Bridgend and Neath Port Talbot falling into administration.

How do we engage with business more effectively to deliver ambition?

Advocacy on the part of WG to work with organisations such as the CBI to promote ecosystem service delivery. This point can be extended to other sectors, such as Heath, Social Services.

Promotion of ecosystem service delivery through conferences aimed at businesses.

Investment and promotion of projects that are shown to be cost saving for business e.g. Pontbren.

Section 106 agreements could include an element relating to ecosystem delivery.

The establishment of Sustainable Urban Drainage System Approval Bodies as identified under the Flood and Water Management Act 2010 will also provide an effective means of ecosystem service delivery and provide a means of interaction with the development industry. This duty will also need to be supported by resources and guidance to ensure there is no conflict with the planning and development process.

Welsh Government must provide strong leadership in this area. Delivery of the integrated natural resource management approach should be consistently applied throughout all the Government departments and policies. This will provide a consistency that businesses will respond accordingly to effectively deliver the ambition.

How can we strengthen the way we work together?

Funding will always be an issue, but need to consider what else is available to deliver ecosystem services e.g. firming up advice and statutory instruments such as in relation to wildlife crime, invasive species control. In relation to the latter, this is an increasing issue with prospective house sellers and buyers and could be an effective way of promoting effective ecosystem service delivery.

As has been stated throughout, evidence is crucial to effective ecosystem service delivery. Therefore, promotion of the role of local record centres and the services

they offer should be promoted.

Also, there is a need for the LRCs to be more public facing and user friendly, but they are very worthwhile and can be a good conduit between developer, community, public bodies.

Local providers require strong leadership and resources from WG.

How can we share budgets and look at integrated outcomes?

Budgets should be aimed at ensuring projects are self-sustaining in the long term. Therefore, projects will need multiple partner organisations/ individual input. This suggests that training may and will be required in terms of management, species identification, management planning, etc..

WG may not be best placed to review grant applications and allocate budgets. NRW and WBP ecosystem groups are best placed to identify and integrate outcomes at the landscape level. At a local level, local biodiversity partnerships, local authorities and NRW regional teams would be able to ensure integrated outcomes.

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

Public sector bodies have a significant part to play in the delivery of ecosystem services and its socio-economic and environmental benefits. However, are other public sector bodies e.g. Health boards fully aware of what ecosystem service benefits can be achieved?

Bridgend CBC is developing a green infrastructure approach and in the first instance has developed supplementary planning guidance in order to deliver ecosystem service delivery through the planning process.

The aim is to work with other directorates to promote the ecosystem services concept and its benefits on a service by service basis. A website is also being developed aimed at communities, developers and householders to give a public facing side to ecosystem service delivery at the local level.

Consultation with local biodiversity partnerships of WG projects will help to avoid duplication identify collaborative working and reduce the likelihood of conflicting projects.

How can we best use information Hub to collate and disseminate data and evidence?

What is the information hub?

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

Consider different means of promoting ambition through different media points and the tone of which information is being put over.

Promote through national campaigns.

The BBC Springwatch/Autumnwatch programmes have shown there is a great interest and wish to be involved in the countryside and this hasn't been exploited in Wales. Wales Biodiversity week runs during the time Springwatch is being shown. Wales Biodiversity Week operates a range of events throughout Wales and attendance could be better, despite the efforts that WBP put into promoting and resourcing the week. Therefore, such programmes need to be exploited to further the cause of Welsh wildlife and thereby Ecosystem Services.

Who are you communicating the progress of the delivery of your ambition too? E.g. the general public would be interested in specific projects, local authorities in work plans or projects occurring in their area over a longer period.

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.

Natural systems don't operate on given boundaries or to political timetables. Therefore, there should be a long term approach to effective ecosystem service delivery and a legacy that successive administrations/ministers should sign up to from the beginning.

Those of us working in the ecology/ nature conservation profession would argue that we have been implementing effective ecosystem service delivery albeit under the names of sustainable development, Local Agenda 21, etc. and this appears to be forgotten.

We agree with the need to understand our natural resources and to ensure their provision. However, wording of future policy, management plans and any environmental legislation may also need to use a precautionary approach to ensure that where natural resources or the impact on them are not completely understood they can still be protected. Species and habitats should also be protected due to their intrinsic value as well as their economic or social value and it is the role of this document to ensure this.

If all else fails, the conservation of species and habitats should be underpinned by a policing mechanism used as a final deterrent and adequately resourced.

Ref. 0082 - Joint Nature Conservation Committee

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?

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The green infrastructure within urban areas is incredibly important for local people, wildlife and 'getting the message across' with respect to ecosystem services. WG is responsible to the tax payer and it is difficult to make the connection how works can benefit individual members of the public when it is undertaken outside of people's communities.

It is the small pockets of green space within the settlement boundary that can have immediate impact on people's lives, though the provision of multifunctional accessible natural green space. These green spaces can also assist in alleviating flooding and have benefits to health, reducing pollution, biodiversity enhancement, community cohesion and as a means of boosting the economy. Bridgend CBC has made a start by developing a Green Infrastructure Approach, encouraging developers to maximise green assets and biodiversity on their site through multifunctional solutions.

This may be addressed within the action providing better governance to benefit nature strategic action. However, a lack of funding to produce action on the ground has resulted in many environmental groups such as Groundwork Bridgend and Neath Port Talbot falling into administration.

How do we engage with business more effectively to deliver ambition?

Advocacy on the part of WG to work with organisations such as the CBI to promote ecosystem service delivery. This point can be extended to other sectors, such as Health, Social Services.

Promotion of ecosystem service delivery through conferences aimed at businesses.

Investment and promotion of projects that are shown to be cost saving for business e.g. Pontbren.

Section 106 agreements could include an element relating to ecosystem delivery.

The establishment of Sustainable Urban Drainage System Approval Bodies as identified under the Flood and Water Management Act 2010 will also provide an effective means of ecosystem service delivery and provide a means of interaction with the development industry. This duty will also need to be supported by resources and guidance to ensure there is no conflict with the planning and development process.

Welsh Government must provide strong leadership in this area. Delivery of the integrated natural resource management approach should be consistently applied throughout all the Government departments and policies. This will provide a consistency that businesses will respond accordingly to effectively deliver the ambition.

How can we strengthen the way we work together?

Funding will always be an issue, but need to consider what else is available to deliver ecosystem services e.g. firming up advice and statutory instruments such as in relation to wildlife crime, invasive species control. In relation to the latter, this is an increasing issue with prospective house sellers and buyers and could be an effective way of promoting effective ecosystem service delivery.

As has been stated throughout, evidence is crucial to effective ecosystem service delivery. Therefore, promotion of the role of local record centres and the services they offer should be promoted.

Also, there is a need for the LRCs to be more public facing and user friendly, but they are very worthwhile and can be a good conduit between developer, community, public bodies.

Local providers require strong leadership and resources from WG.

How can we share budgets and look at integrated outcomes?

Budgets should be aimed at ensuring projects are self-sustaining in the long term. Therefore, projects will need multiple partner organisations/ individual input. This

suggests that training may and will be required in terms of management, species identification, management planning, etc..

WG may not be best placed to review grant applications and allocate budgets. NRW and WBP ecosystem groups are best placed to identify and integrate outcomes at the landscape level. At a local level, local biodiversity partnerships, local authorities and NRW regional teams would be able to ensure integrated outcomes.

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

Public sector bodies have a significant part to play in the delivery of ecosystem services and its socio-economic and environmental benefits. However, are other public sector bodies e.g. Health boards fully aware of what ecosystem service benefits can be achieved?

Bridgend CBC is developing a green infrastructure approach and in the first instance has developed supplementary planning guidance in order to deliver ecosystem service delivery through the planning process.

The aim is to work with other directorates to promote the ecosystem services concept and its benefits on a service by service basis. A website is also being developed aimed at communities, developers and householders to give a public facing side to ecosystem service delivery at the local level.

Consultation with local biodiversity partnerships of WG projects will help to avoid duplication identify collaborative working and reduce the likelihood of conflicting projects.

How can we best use information Hub to collate and disseminate data and evidence?

What is the information hub?

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

Consider different means of promoting ambition through different media points and the tone of which information is being put over.

Promote through national campaigns.

The BBC Springwatch/Autumnwatch programmes have shown there is a great interest and wish to be involved in the countryside and this hasn't been exploited in Wales. Wales Biodiversity week runs during the time Springwatch is being shown. Wales Biodiversity Week operates a range of events throughout Wales and attendance could be better, despite the efforts that WBP put into promoting and

resourcing the week. Therefore, such programmes need to be exploited to further the cause of Welsh wildlife and thereby Ecosystem Services.

Who are you communicating the progress of the delivery of your ambition too? E.g. the general public would be interested in specific projects, local authorities in work plans or projects occurring in their area over a longer period.

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.

Natural systems don't operate on given boundaries or to political timetables. Therefore, there should be a long term approach to effective ecosystem service delivery and a legacy that successive administrations/ministers should sign up to from the beginning.

Those of us working in the ecology/ nature conservation profession would argue that we have been implementing effective ecosystem service delivery albeit under the names of sustainable development, Local Agenda 21, etc. and this appears to be forgotten.

We agree with the need to understand our natural resources and to ensure their provision. However, wording of future policy, management plans and any environmental legislation may also need to use a precautionary approach to ensure that where natural resources or the impact on them are not completely understood they can still be protected. Species and habitats should also be protected due to their intrinsic value as well as their economic or social value and it is the role of this document to ensure this.

If all else fails, the conservation of species and habitats should be underpinned by a policing mechanism used as a final deterrent and adequately resourced.

Ref. 0083 - Dwr Cymru

Question 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?

Question 2: Does the ambition statement capture this new approach fully? What might be added?

[Joint answer to questions 1 & 2 below]

We support the Welsh Government's proposed ambition which recognises that reversing the decline of biodiversity and building ecosystems' resilience will bring

wider benefits to society.

In that light, Dwr Cymru will be continuing with a range of investments over the next 5 years to do just that – to support environmental improvements in our uplands, and the water quality and associated ecology of our rivers, estuaries and the marine environment. This will be supported by our largest ever environmental investigatory and research program, including work to trial a 'Paid for Ecosystems Services (PES)' approach, catchment management to improve upland water quality and quantity, and different regulatory approaches to permitting to name but a few. For this to be successful, we need leveraged funding from a number of sources, be them research councils, Universities, the regulators themselves, and or Welsh Government. We very much look forward to your continued support to our work.

In terms of adding to the statement, it would be useful for the Welsh Government to specifically acknowledge that the well-being of Wales' economy and society is interdependent with Wales' environment, including the associated flora and fauna.

It is clear that Welsh Government considers social and economic pressures are causing biodiversity loss (page4). To assist businesses to work with Government to reverse these losses, clarification would be helpful on what would be considered as "lasting benefits" to society, as these need to be measured and recognisable by all parties if they are expected to contribute to the effort to reverse any biodiversity losses.

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

We support the proposed goals, although the goal to achieve 'no net loss' of biodiversity seems unambitious in a nature recovery plan. The goals also need clarification on the scale of implementation, e.g. is no net loss applicable for a specified site/catchment/or Wales as a whole?

We believe there will need to be considerable improvement in the management of Wales' protected sites and in improving the evidence base if the Plan's ambitions are to be realised.

One particular concern for us is the continuing uncertainty about the conservation status of many SSSIs and Natura 2000 sites in Wales. In the absence of good data, the features default to unfavourable condition sadly. Much is also unknown about the needs of many features that are protected under conservation legislation. This combination risks burdens being placed on third parties such as Dŵr Cymru, for no other reason than little is understood about the sites. As well as potentially hampering economic development, this lack of knowledge also can risk hindering species' long term survival. We hope that the new strategy will ensure that Natural Resources Wales (NRW) attaches a much higher priority to improving its understanding of the state and needs of Wales' protected sites, and that this data is

shared to assist others to play their full role in improving the natural environment.

The impact of this legacy of data poverty should not be underestimated. To that end, Dŵr Cymru is an active member of the Wales Biodiversity Partnership and we hope that its Evidence Gap Project will help to establish a baseline from which improvement may be measured.

A further matter we would wish to bring to your attention is the LIFE N2K programme, which NRW has inherited from the Countryside Council for Wales. This set out with a number of very worthwhile ambitions for completion by 2014, including the production of a, “solid evidence base, drawing together existing information from across Wales and Europe” and “Action or implementation plans for every Natura 2000 area, detailing essential activities with costs, funding and work timetables for the period 2014 to 2020”. Since its establishment, the programme seems to have lost its focus to the extent that we are no longer expecting anything useful to emerge.

Question 4: Are the actions proposed right and adequate?

We fully endorse your wish to encourage cross-sector policy integration.

Currently the burden placed on some sectors is unfair compared to others. For example, when the impact of Dŵr Cymru’s abstractions is being assessed as part of the Habitats Directive related ‘Review of Consents’ exercise, our regulator adopts a broad principle of <1% impact to demonstrate no adverse effect upon site integrity. We think it is only fair that the same approach be applied to other sectors, including agriculture and fisheries. The value of Dŵr Cymru’s investment – which is, of course, paid for by our customers – can be seriously undermined if other sectors are not subject to the same rules as we are and made to do their fair share.

A good example of which is the way nutrient levels in our rivers are assessed. Dŵr Cymru has been required to reduce the levels of phosphorus in discharges from a number of our waste water treatment works as NRW advises that they might impact on the features of Natura 2000 sites. Meanwhile, diffuse and multi point nutrient inputs from local farms seem to be allowed to continue unabated, and planning permissions for further development of sites which produce diffuse pollution to such waters continues. The emerging Wye SAC Nutrient Management Plan in which Natural England, the Environment Agency and Natural Resources Wales are all involved is a good example of this disparity.

We would urge a degree of caution about asking which species or habitat society thinks warrant priority. Atlantic salmon are a good illustration of the potential pitfalls. There are groups that argue that these fish deserve more protection than other protected species (such as otters or predating birds) because of the economic benefits that angling may bring to the Welsh economy (even though angling may

itself be a damaging activity at some SACs). However, Salmonids cannot be singled out for protection as they are part of an ecosystem, relying on a wide variety of other flora and fauna during their life cycle. It is also true that, as noted in our answer to question 3 above, much remains uncertain about the habitat that salmon need to thrive (see for example report from the Atlantic Salmon Trust Flows Workshop in March 2010 which concluded, "...that current standards for river flows are unsatisfactory because their evidence base is unclear, the suites of standards are inconsistently specified and applied by regulators").

Against that background, we believe that the best way of supporting all water dependent flora and fauna is by delivering good ecological status under the EU Water Framework Directive (WFD) (this suggestion is expanded in our answer to question 5 below). This should ensure that an holistic approach is adopted: in the case of migratory fish populations this would include, where relevant, measures to improve water quality and/or to remove physical barriers to fish passage.

We therefore also recommend that the provisions within Natural Resources Management Plans relating to the aquatic environment and its conservation importance must cross refer to the WFD.

Question 5: What additional actions would you wish to see?

We recommend that Welsh Government do more to identify and harness the linkages between various environmental policies and obligations. For example, the WFD has at its heart the aim of bringing all waterbodies up to good ecological status. If this aspiration obligation is achieved, it will deliver the recovery of the flora and fauna that rely on Wales' freshwaters and coastal waters. Within WFD there are clear links with the Habitats Directive as water dependent Natura 2000 sites enjoy an enhanced level of protection. The WFD should therefore be acknowledged as the main tool for improving biodiversity in the inland and coastal aquatic environment, and the Welsh Government's conservation funding for Natural Resources Wales should reflect the WFD's dual role.

The Marine Strategy Framework Directive should play a similar role in the marine environment and should be resourced accordingly.

The Welsh Government's Nature Fund was well intentioned. However, it seemed to exclude small but worthwhile projects by locally focussed environmental NGOs, which we regard as a missed opportunity for promoting community engagement. The timescales for project delivery were also unrealistic. We hope that the Welsh Government will review the operation of the Fund to learn lessons for the future.

Question 6: How do we engage with business more effectively to deliver our outcomes?

Dŵr Cymru's business relies on the water environment so we appreciate that its

protection is our company's long term interest.

We believe businesses would be more willing to support investment on biodiversity related schemes if the requirements placed upon them were based on sound science. All too often that is not the case and, instead, reliance is placed on "expert judgement". We continue to be surprised by how little monitoring and research is undertaken into the health of supposedly protected features. This lack of basic monitoring means, for example, that there is no robust way of assessing whether the actions that we, or other business sectors, are required to take – often at considerable expense to our customers - to protect and conserve those features have made any difference.

The water industry has a five yearly investment cycle. Any improvements that NRW require of us go through processes linked to the national environment programme. These assess our customer's willingness to pay for such improvements. The LIFE N2K project referred to above has yet to produce its main deliverable, i.e. Prioritised Improvement Plans (PIPs) for each site. Sadly by the time these PIPs appear it will be too late to take them into account in our next five year investment programmes. Better regulatory alignment with the WFD and or Company business planning cycles would enable a wider business community to engage in such projects.

Lessons also need to be learnt from the management of Action Database or the Special Site Project, which included actions for named organisations without the knowledge, let alone the agreement, of those parties. Such an approach does nothing to encourage participation and support to such schemes.

Question 7: How can we strengthen the way we work together?

The WFD provides an ideal existing statutory mechanism for consulting stakeholders and seeking buy-in from all parties to work together to improve the aquatic environment. Under the WFD, Member States must identify the main pressures affecting individual water bodies (mine waters and agriculture being the most widespread contributors to failures in Wales) and requires Member States to devise and consult on plans to address those problems. In this way, the Directive should ensure the involvement of all stakeholders, be they regulators, other major players such as Dŵr Cymru, businesses that may be impacting on particular waterbodies, or local land managers, as well as the relevant national and local environmental NGOs.

The other advantage of utilising existing WFD processes is that businesses will receive a single message, rather than receiving one message about water quality and a separate message about helping nature to recover.

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

Ultimately NRW will have to play the leading role in the nature recovery plan and

the Welsh Government will need to provide it with adequate funding to support its regulatory functions, if revenue streams cannot be provided from diffuse and multi point sources of pollution in accordance with the pollute pays principle.

Our ideas outlined above about the WFD are essentially about integrated outcomes. The NRW's WFD funding should reflect its wider value to the delivery of nature conservation. The Directive also provides the framework for the actions by the implicated sectors to be coordinated so that each can play their part in delivering good ecological status.

Particularly at a time of continuing financial challenges, Dŵr Cymru agrees that it makes sense to look for opportunities to collaborate. We have previously established a WFD funding scheme which provides financial contributions to not-for-profit organisations for projects that will deliver improvements to Welsh rivers, lakes and waterways and or evidence to design other WFD measures cost effectively. To be eligible, applicants were required to describe how their proposal related to Dŵr Cymru operations or assets. The initial £400,000 scheme was launched in July 2012 and matched a fund operated by NRW. Dŵr Cymru added a further £150,000 in July 2013. From our perspective, these projects represented a cost effective approach to reducing our impact or the risk of future improvements being required at Dŵr Cymru assets.

Our 'Rainscape' initiative is another excellent example of an integrated outcome. Although primarily aimed at achieving better surface water management to reduce flood and pollution risks, a key element is working with local stakeholders and the community to develop schemes that will maximise wider social, economic and environmental benefits. We aim to deliver biodiversity benefits through RainScape in a variety of ways, including habitat creation and enhancement, reduction of pollution and delivery of local biodiversity action plans.

These benefits can be seen in our Rainscape programme that is underway at Llanelli and Gowerton to remove surface water from the combined network and improve water quality in the Loughor estuary. These works are mainly intended to improve compliance with various European requirements. However, in designing the project, local biodiversity officers have been consulted about the species of trees and grasses we should plant, thus widening the benefits these important schemes will bring. Other biodiversity benefits will be derived from the construction of swales, attenuation basins, ponds and rain gardens. Planters will be installed in the area to attenuate and filter surface water run-off. These solutions will support and attract flora and fauna and can be used by the local community to gain more of an understanding of their local environment.

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

Again we believe that duplication can be avoided if the WFD, with its tie-in to the delivery of the Habitats Directive in water dependent N2K sites, is recognised as the main vehicle for enabling the recovery of the nature that relies on Wales' freshwater and coastal aquatic environment.

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

We agree that information should be available to all those with an interest and linked to other existing data inventories. There are some duplication of efforts in collecting and holding data. WG should take the lead and make clear that such an information hub is to be the one-stop shop for all environmental data. This would signal to other players that their efforts can and will be co-ordinated.

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

For the Natura 2000 sites, progress should be based on the outcome of the six yearly reporting cycle within the Habitats Directive and should include updates on the evidence and status of each of these "jewels in the crown of our natural environment".

As stated above reporting on progress against the objectives of the WFD provides a regular and quantifiable measure of recovery to Good Ecological Status.

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

The 'next steps' seems to be going down the same route as the Natural Environment Framework when it was introduced, when there were separate work-streams looking at communication, evidence and data gathering and delivery

Rather than reinventing the wheel or drafting new regulations, the importance of existing powers and obligations, such as the biodiversity conservation duty within section 40 of the Natural Environment and Rural Communities Act 2006 need to be more widely recognised, adequately resourced and applied to drive activity.

Compliance with these obligations should be monitored and published through the WFD process, with a clear set of measures for their delivery which is proportionate, and aligned with the polluter pays principle.

Ref 0085 - Torfaen County Borough Council

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?

Against a background of continued biodiversity decline, as illustrated by successive reports and missed targets such as the 2010 UK and global target and the recent State of Nature assessment, it is widely acknowledged that a fresh approach to reversing declines is long over due.

Nonetheless to rely solely on the commitment and actions of a shrinking resource of ecological professionals accompanied by the work of NGO's etc. will not alone be sufficient to meet the next global biodiversity target in 2020. In this regard a fresh approach that seeks to engage a wider audience beyond the boundaries of environmental practitioners is to be supported. A policy framework set around an agenda that communicates the value of the natural environment to socio-economic sectors is more likely to gain momentum than one that abdicates responsibility for biodiversity conservation and enhancement solely to those who are already committed to action.

That said in cultivating a new approach it is important to ensure that a balanced delivery framework is adopted. Society does in fact rely on natural resources for its well-being, but in pursue a new audience to capture this benefit it must be remembered that the overall purpose of the Nature Recovery Plan is to reverse biodiversity declines. Any new initiative that fails to recognise this will not achieve its aims and objectives.

A network of existing protected areas augmented by additional designated sites in a networked strategic landscape scale concept is a laudable approach. An aspiration of a green infrastructure that is valued by society and decision makers that is akin to the investment in the grey infrastructure would be a major achievement of this plan.

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

This ambition statement captures well the utilitarian nature of the new approach, however, it should not be overlooked that biodiversity means more to society than simply a commodity to be traded. There is a significant body of evidence suggesting that green space and its component biodiversity is important for its intrinsic value. This value is recognised in the post Convention on Biological Diversity (CBD) conservation ethic and therefore should be acknowledged in this plan.

Progress toward a wider understanding of the importance of and therefore action for biodiversity conservation has been undermined by difficult scientific terminology. This jargonised approach to 'nature conservation' means little to civil society. Words such as resilience, natural resource management, ecosystem, sustainability, etc. conspire to act as a disincentive to broadening the understanding of the value of

nature and therefore could be an obstacle to wider action.

Should the ambition be time limited? Given the next CBD target is 2020 consideration should be given to inserting this date into the ambition statement. A target date helps focus the delivery of the ambition, without a target progress toward achieving the ambition can easily drift.

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

The goals are laudable, as they are consistent with the Aichi targets, and are reminiscent of those set out in the UK Biodiversity Action Plan.

- To improve degraded habitats at scale – this goal requires a quantifiable target. An evidence base of where degraded habitats are present will help target actions. What does scale mean? Bigger, better and more connected is an acceptable goal but action on a small scale is equally important.
- To address key negative factors of biodiversity loss and increase connectivity significantly – as mentioned above it is vital that connectivity is increased by targeting degraded habitats that are barriers to landscape permeability. To do this the evidence base needs to be in place to inform actions.

Addressing negative factors of biodiversity loss will be a challenge. Many of these factors are beyond the influence of LA ecologists. Action to ensure balanced land use planning and infrastructure project implementation are delivered sustainably is also required.

- To improve management of our highest quality environments – what are the highest quality environments? I suspect this refers to protected sites but it could be deemed that at a local level a resident with access to local diverse green space is qualifies as a high quality environment.
- To achieve 'no net loss' of biodiversity – how is this measured? We have missed targets based on this goal before. That said I would welcome the retention of this goal as it can help focus actions on ensuring that maximum effort is given to integrating biodiversity enhancement into projects.
- To put in place a framework of governance to support delivery, working together across sectors and strengthening our collective evidence base – the biodiversity sector is generally poorly resourced. LA's have is decreasing body of specialist staff and NGOs rely on variable membership subscriptions and external funding. If delivery of this goal is not widened to embrace all land management sectors it will struggle to succeed. That said any broad base framework must have specialist ecological staff at it's core to ensure well informed and relevant decisions are made.

4. Are the actions proposed right and adequate?

There needs to be more of an emphasis on practical action – this appears to have been neglected in the plan. How will declines be reversed if no framework exists for co-ordinated actions at a local level?

- Putting in place effective natural resource management – it is noted that National Resources Wales will be responsible for area statements, how therefore will these initiatives fit into the current land use planning regime?
- Facilitating cross-sector policy integration – as mentioned elsewhere a strengthening of the NERC duty to ensure it is not just the LA that is monitored is one way of embedding biodiversity and natural resources management across a wider audience. WG also needs to foster an approach that ensures all other sectors are obliged to seek out biodiversity advice rather than biodiversity professionals having to engage in unproductive and time consuming activities to get implementation on the ‘coat tails’ of projects managed by others.
- Funding our partners – biodiversity funding needs to be hypothecated and committed to the long term as trends in biodiversity declines cannot necessarily be altered in the short term. Compared to other strands of sustainability, biodiversity is grossly under resourced. Sourcing external funding can be time consuming and take natural resource managers away from direct practical action. Furthermore, as in the case of the Nature Fund, funding is often offered at an inappropriate time of year, with short time scales for delivery.
- Identifying financial instruments – biodiversity off- setting is a new concept and one that is often viewed with suspicion by some biodiversity professions. A clear policy framework needs to be developed around off-setting that seeks to build confidence in an approach that could provide benefits but could also be a vehicle for continued declines if not properly thought through.
- Review designated sites and species – designated sites are hubs of biodiversity, hotspots that feed the wider landscape with its wildlife. If this new ambition is to be realised protection for designated sites and species should be strengthened but at the same time it needs to be fit for purpose. Any review should be based on good science with the priorities of ecosystem management and biodiversity the paramount considerations.
- Improving the evidence base – the narrative does not highlight the existing framework of Local Records Centres and the excellent work undertaken by these bodies.

The final paragraph mentions making better use of information gathered through the land use planning system. It is unclear what this refers to. Information provided through development proposals are subject to copyright etc. To undertake a data gathering exercise through planning applications is beyond the current capacity of LA ecologists and is therefore unrealistic without additional resources.

- Encouraging effective communication and engagement – much good work is being delivered by LA ecologists and biodiversity officers through biodiversity partnerships and has not been acknowledged in the plan. Support for this structure and network needs to continue.

5. What additional action would you wish to see?

Recognition that the existing LBAP process is a good platform on which to deliver a new ambition is needed. Proceeding with a renewed approach that doesn't include the successful parts of a previous policy is short sighted. A suggested action would be to invest in the Wales Biodiversity Partnership ensuring that support is enhanced for local authority ecologists and biodiversity officers who are often at the coal face of policy delivery and that the work of Local and Strategic Biodiversity Partnerships is appreciated.

There's a need to redouble efforts around the monitoring and support for local authorities in the reporting of actions in the respect of obligations under the Natural Environment and Rural Communities Act 2006. LA ecologists provide the main mechanism for engagement of other sectors at a local level and continued support for this work is much needed. Reductions in local government budgets could see further erosion in ecological staff and therefore severely hamper the ambitions of the Nature Recovery Plan. It is also crucial that LBAPs continue as the main vehicle for delivery at a local level.

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

It is important that businesses grasp the understanding that without a sustainably managed natural resource the prospects for economic growth are restricted. Welsh Government has a leading role in communicating this through the promotion of case studies and exemplar projects coupled with financial incentives. What about a business focussed web based portal that showcases best practice? It would also be useful to extend an invitation to the business community to attend national conferences such as the Wales Biodiversity Conference. A priority should be placed on breaking down the barriers that may exist between the economic and environmental sectors as the green economy plays an important part in the prosperity of Wales. Why not engage a 'national business and biodiversity' champion who could encourage, support and mentor business support, against an understanding that what is good for biodiversity is good for economic development.

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

There needs to be an acknowledgement that the LBAP process has worked on a basic level and that local authorities have a continuing role in steering LBAPs and as a link between LBAPs and the Wales Biodiversity Partnership Strategy Board.

The Nature Recovery Plan promotes a landscape scale approach and as such the work of regional groups such the Greater Gwent Biodiversity Advisory Group (GGBAG) should be strengthened. It is crucial that statutory nature conservation bodies and other government departments fully engage with such groups and not focus exclusively on the forthcoming Natural Resource Plans and attendance at Public Service Board meetings.

Welsh Government should develop a better understanding of the delivery mechanisms for this plan. Only through a clearer picture of how biodiversity actions are implemented at a local level and the constraints that exist, can a plan actually reflect a realistic approach to reversing biodiversity declines.

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

Breaking down the barriers that exist between differing local and national government departments to enable budgets to be shared is major challenge. Integrated outcomes can be achieved by ensuring that Welsh Government grant aid and other financial instruments demonstrate that projects etc. are delivered in a balanced and sustainable way.

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

If WG believe that natural resources etc. underpin all other sectors then it needs to be adequately resourced. Although the availability of resources alone will not reverse biodiversity declines it could be said that poor funding for the sector is a major contributing factor in a continued erosion of the natural environment.

A compulsory requirement to report biodiversity actions is needed. There are examples of government funding streams supporting actions that impact negatively on biodiversity.. This can demonstrate a lack of joined up thinking within and between government departments that could be addressed by a reporting system that is fit for purpose.

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

Not aware of the Information Hub so unable to comment. It is however very important to invest in a good evidence base and to provide wider access to relevant information. The Local Records Centre have an important role to play in this but local authority service level agreements (SLAs) are optional and at the mercy of cuts. Adequate government funding that establishes a LRC service that is available to all local authorities is one measure that WG could implement to ensure the wider dissemination of biological information to local level decision makers.

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?

A work programme that covers the term of this plan is required. Many of the actions will be medium to long term deliverables but an annual reporting system will help ensure targets are kept on track.

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.

Under section 40 of the Natural Environment and Rural Communities Act 2006 (NERC) all public bodies have a duty to have regard to biodiversity. To date this duty has almost exclusively been applied by local authorities. Other public bodies such as NHS, Police service, Welsh Government appear less committed to this obligation. If targets under this plan are to be met more support, guidance and scrutiny of other public bodies are required.

It's also reasonable to suggest that a modification is made to section 40 of NERC to include the functions of ecosystem services. This modification could then also help ensure that the proposed new approach of Natural Resource Plans through the auspices of the Public Service Boards and the Well Being and Future Generations Bill are delivered.

It is extremely disappointing that the role of Local Biodiversity Action Plans (LBAP) and their implementing partnerships have not been acknowledged. Although LBAP's have failed to turnaround the fortunes of biodiversity they have been successful in raising the profile of biodiversity and to pull together those willing to work together in a partnership. In Torfaen the local biodiversity partnership continuing to be a strong and well respected forum that has adapted its role to reflect the changing face of environmental and sustainability policy. To proceed with a new plan without including a place in the delivery of its actions for the established biodiversity partnership does not respect the hard work put in by the partner organisations.

Ref. 0089 - Edmund Marriage

The State of Nature and other independent reports demonstrate a catastrophic situation in Wales for biodiversity, which is best expressed by Iolo Williams on this link: <http://www.britishwildlifemanagement.net/index.php/2013-04-26-17-29-15/2013-04-29-12-19-27/367-iola-williams-on-the-state-of-nature-report>

The overwhelming evidence from Alan Savory of the Savory Institute for the return of livestock to the Uplands in large numbers, to save the planet, is on this link:

<http://www.britishwildlifemanagement.net/index.php/2013-04-26-17-29-15/2013-04->

[29-12-19-27/375-how-to-fight-desertification-and-reverse-climate-change](http://www.britishtwildlifemanagement.net/index.php/2013-04-26-17-29-15/presentations)

My detailed PowerPoint submission and recommendations for the recovery of the British Uplands and Lowlands can be found on the following link (if not currently posted, available before the end of this week):

<http://www.britishtwildlifemanagement.net/index.php/2013-04-26-17-29-15/presentations>

Progress on eliminating bTB and Bracken as recommended above, action on Ticks, Heather Beetle, unpalatable Weed Grasses, reseeding Heather, facing the facts on Climate Change - Hot or Cold, Currency issues, the obstructive EU, Compulsory Predator control, are all priorities set out clearly in the Power Point: Dartmoor: An Area of Outstanding Management Neglect - or should Dartmoor and the British Uplands be - a Viable and Productive Farmed Upland Landscape Delivering Biodiversity ?

Please may I have a meeting with Ministers as soon as possible.

Ref. 0090 - Cofnod - North Wales Environmental Information Service

Comments on the whole document

Although the broad aims of the document seem to be evident, overall there is too much substance to make it easily understood. We feel it could be more concise and to the point and in doing so might have greater impact. The section on the 'Policy Context' seems ill placed and also too comprehensive to grab the reader's attention. This should perhaps be contained in an annex. Some of the language seems over complicated for the general public; ecosystems and resilience are just two examples.

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?

Yes we agree reversing the decline in biodiversity is a good thing and this in turn will "ensure lasting benefits to society". This alone should be the focus of the ambition as beyond this the ambition gets a bit lost in jargon. "Building resilience in ecosystems" and "focusing on natural resource management" are not easily understood concepts and although they are further explained in the text it is difficult to see why they form part of the ambition. It's almost like the ambition needed to

include them as they are the latest buzz words. By including the “focusing on natural resource management” also seems to treat biodiversity as a commodity rather than something intrinsic to life. The ambition should be what it is hoped will be achieved and not the mechanism which it will use. We would therefore ask that the ambition is simplified to focus on “reversing the loss of biodiversity”. Furthermore the document goes on to say that it would set a goal to have “no net loss of biodiversity”, which isn’t the same as “reversing the loss”. The document needs to be clear about what it is aiming to do, as reversing the loss implies that biodiversity loss will not only be halted but also reverse anything that has been lost subsequently. There doesn’t need to be anything further captured in the ambition. It is already too complicated.

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

The new approach seems to be the use of the integrated management of ecosystems and indeed natural resource management to “reverse the decline in biodiversity”. Again we would argue this is too focused on jargon. The ambition to reverse (or halt) biodiversity loss hasn’t happened, so perhaps a new approach is needed, but we have no evidence that this new approach will achieve the desired effect. We probably need to refocus on the ambition and not describe the mechanisms by which it might be done in the ambition; this only clouds the ambition in jargon.

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

The goals all seem admirable; however the text merely describes the goals and spends no time suggesting how they might be achieved. We were therefore left with the thought, “sounds good, but how will this happen”? The specific goal to achieve ‘no net loss’ of biodiversity, suggests “we need to integrate biodiversity into decision making”. As a Local Records Centre (LRC) operating across 7 planning authorities we can see that there is evidence in certain authorities that this isn’t happening and perhaps it is happening less as Local Government cuts continue. For example 5 of those 7 Local Authorities use our services, which is to provide essential biodiversity evidence to aid decision making. Whilst two authorities, Anglesey and Wrexham, continue to ignore our services, thus not fully integrating biodiversity into their decision making processes. Furthermore we have already been warned that Denbighshire Unitary Authority will cease its arrangement with us next financial year, citing budget cuts as the major factor, leaving only 4 of the 7 Local Authorities able to access essential biodiversity information. This is an example of where local preferences take precedence over the need to ensure consistent and durable process. Whilst this continues to take place, integrating biodiversity into decision making will only be partially successful.

We would have liked to see a greater emphasis through the goals to developing a robust and complete evidence base. Although this is referred to in other parts of the document, we believe that having evidence to measure your goals against is essential. Local Records Centres can provide a route for some of this evidence and we would like to see our role strengthened to channel a range of data, from baseline information held in paper format where this is the only available evidence, through to ensuring that all new evidence collected, especially by funded programmes and projects, are fed into the LRC databases. Only by doing this and being able to access this data when required, will it be possible to assess whether or not our goals are being achieved. We believe the measurement of the “achieve no net loss of biodiversity” goal needs to be considered and would like to offer LRC services to help archive and share the necessary information.

4. Are the actions proposed right and adequate?

We are pleased to see that “Action focused on evidence and research” is highlighted under the “Focus for Action”. Furthermore that “Improving our Evidence Base” features strongly. We believe Local Records Centres can provide a useful tool for managing and disseminating some of the evidence required to “report on status” and monitor “biodiversity targets based on robust evidence”. To ensure consistency, we feel it is important that as many organisations as possible who wish to use our evidence we hold are able to do so. Currently Welsh Government and 2 local authorities in our region, make very little use of our evidence base, we would like to see this change. On top of this there could be better targeting of what evidence is required to measure targets and some of this work could be coordinated through Local Records Centres, using our local knowledge and data management skills. We also believe that with better planning of the type of data required, how it will be collected, managed and shared, many projects and programmes could provide evidence, not only to contribute to better management of the project or programme but also contribute to the evidence base used to report on status and monitor targets. Local Records Centres are ideally placed to provide useful guidance on the collection of data and also robust mechanisms for managing and sharing these data.

For “Action focused on monitoring and surveillance” we are pleased to see “priority species and habitats” included in this action. However the use of the phrase “that society wishes specifically to see benefit from improvements to our ecosystems” suggests that improving ecosystems will help species and habitats, we would suggest it is the other way around and that improving the plight of habitats and species will subsequently improve the ecosystem. We believe that having access to a consistent evidence base is important in this area and we would cite the work we carry out for Local Authorities to identify species and habitats potentially threatened by development through the planning process. This is also linked to the final action “focused on safeguarding species, habitats and ecosystems”, as the evidence we

provide to decision makers helps to “integrate the value and importance of biodiversity”. However we would like to see our evidence base more widely available so that we can assist this action “across all decision making”.

We are surprised to see no further explanation regarding “Action focused on engagement and support”, and as such it is difficult to anticipate how this action will be carried out. However we are encouraged to see this action recognised. In many Local Authorities Local BAP Officers are becoming a rarity and yet one of their primary functions is to provide “engagement and support” at the local level. We would like to see a refocus on this area of work.

5. What additional action would you wish to see?

We would like to see a commitment to ensure that all projects and programmes, especially where they are funded from Government sources, ensure a commitment to biodiversity conservation and enhancement. Furthermore that the need for biodiversity evidence is recognised, resourced and planned, so that projects and programmes contribute to the widening evidence base on biodiversity. The recently announced projects under the Nature Fund provided an ideal opportunity to test this process, however so far we have seen no examples of where evidence gathering forms part of the funded projects.

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

Due to our independent company status, providing services to the public, private and voluntary sector Local Records Centres provide a useful model of how engagement with business can be achieved. Our services provide businesses interested in developing land with access to high quality data to aid the submission of planning proposals, in exchange for a fee which helps support the Records Centre and its work with volunteers. Many of the businesses decide that it is in their interest to have access to the data as it saves time and money, also in many cases their need to carry out a background biodiversity search is recommended by the Local Authority. We would like to see this recommendation applied more consistently. Furthermore, many of the businesses we deal with (primarily environmental consultants) have no remit to pass any survey data into the Local Records Centre. Thus a large amount of evidence gathered for a wide range of sites across Wales is being lost, therefore degrading rather than “improving our evidence base”. In this specific instance we would like to see engagement being about encouraging or even compelling these businesses to feed their data to us, so it can be better shared and help to underpin further decision making processes.

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

We would like to see greater networking of the organisations concerned with the gathering of environmental evidence in Wales. When the Wales Environmental

Information Forum (WEIF) existed, of which we were a part, we believed this was starting to happen. The WEIF consisted of representatives from the public, private and voluntary sector and was an ideal opportunity to bring people together to discuss important issues related to the management and sharing of data. With greater focus on the need for evidence, the requirement WEIF is even more important. Cofnod would happily contribute to this if required.

We would like to see greater use of the services we provide to a wider audience. We believe that making the data we hold more widely available, would not only allow it to be more integrated in ways of working but also offer opportunities for the innovative use of the data.

Wales boasts the first and only UK national network of Local Records Centres. Collectively Welsh LRCs have nearly 40 years of experience, gathering and making evidence available to organisations. Furthermore, even though we are 4 independent locally based organisations, we continue to work well at the national level and have recently agreed to form a consortium to aid our joint working. We would argue that our experience and structure give us a strong opportunity to contribute to development of the Wales Information Hub. Part of this might be the supply of data, but we also believe if we were involved in designing the hub we can use our collective skills to make it a successful product for Wales.

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

Local Records Centres already rely on different sources of partnership funding at the local and national level, which in turn we utilise to deliver integrated outcomes. Approximately 80% of our funding comes through this route. The system of funding, which is mainly in return for the delivery of products and services, seems at times cumbersome and funding from Local Authorities is very dependent on their ability to prioritise their budgets towards our services. It was proposed during the 'Natural Environment Framework' consultation in 2010 that we look at some form of Pan-Government agreement to fund Local Records Centres in Wales. Some initial work was done on this, but was stalled during the formation of Natural Resources Wales. We would like to see this funding model further investigated, as we believe it will not only reduce administration, but give greater security to the delivery of important evidence for Government.

As mentioned previously we believe there are many projects and programmes which go ahead each year, many funded by Government, which have a requirement for and deliver important biodiversity data. We believe we need to think about the data management requirements at the budget scoping stage and that adequate budget should be built into the projects and programmes to cover the cost of procuring all necessary data and also ensuring that data produced during the process is properly archived and shared. We believe Local Records Centres have an important part to play in this process. They can help plan for the type of data required and also

manage the flow of data throughout the project. They also provide an essential home for the data once the project has finished, allowing the data to be accessed in the future. We would like to see Welsh Government devote time investigating how the process we describe could be templated and integrated into all Government funded projects or programmes. We would be happy to elaborate on this further if required.

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

Duplication of effort is a perennial problem and it continues to prevail even at a time when there are fewer resources. Duplication is often a result of poor planning and not communicating what is required throughout the process. In order to do this there must be a clear vision of what is required and measurable, achievable targets which progress can be gauged against. Successes and failures must be communicated to the wider audience so that there is an opportunity to demonstrate what is happening and also improve on the failures and learn from the successes. Too often a major programme like the Nature Recovery Plan does not communicate well with its constituents, many of which will respond to this consultation. Communication must be wide and varied to suit people's needs and we would suggest the production of a regular e-newsletter, which often gets briefly scanned, is not sufficient.

As suggested in the answer to 7, it is important in our field of work to re-establish a forum where we can debate and agree a way forward regarding the gathering and management of evidence to support the Nature Recovery process. This forum (WEIF) must be properly resourced and should form one of the essential communication tools for delivering the Nature Recovery Plan. By having discussion and agreeing a way forward, this should hopefully relieve us of duplication of effort and concentration on shared goals. As well as resourcing the forum it is important that recommendations from a forum should be resourced too. The success of WEIF was that it brought people together to decide how to achieve some shared goals, the problem came when it tried to plan and implement its recommendations without any additional resources.

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

The Information Hub may be one example of where duplication has already slipped into the process. Local Records Centres already provide a hub for biodiversity data, which is recognised at the local and national level. So although it is recognised the Information Hub has a wider scope than LRCs, we suggest the element related to biodiversity data could be delivered by us or at the very least should be designed closely with LRC input. It is therefore important to consider the Hub as way of drawing data from existing data sources rather than providing something that someone else can already do. The power of the Hub is to draw data together and as a Local Records Centre this is something we believe in passionately.

Our initial view of the Information Hub is that it currently mainly serves as a meta-database, pointing people to where they might acquire data. Although there are some merits in this, cataloguing and showcasing what wealth of data is available in Wales, we have the technology available to take this forward and develop something much more powerful. We would suggest that in designing a more powerful system, which for instance may give live access to data, it is important to agree the appropriate access and not just rely on having access to the data as being sufficient. A precursor to the Information Hub designed several years ago, just seemed to show a map with various unrelated layers on. It was difficult to use and inappropriate to the audience. Our experience of handling and supplying data is that it is important to know what is required of the data before you start making it available. Once it is available, it is important to design tools to fulfil the needs of the data requirement. An example of where this could be employed is to fulfil the broad aim of “making the best evidence available to all those involved in making decisions about the environment”, with a more detailed aim being “making the best evidence available to those maintaining or designing road schemes”, which will require specific tools to make it appropriate to the audience. We have an example of this type of specialist tool designed for use by the Trunk Road Agencies and would be happy to share it with Welsh Government.

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 would like to see a clear and concise plan of how the ambition will be delivered and for this to include some measurable (SMART) targets agreed amongst those who will deliver them. It is important that the targets are ambitious but achievable. As such it might be best to have a mix of long term and short term targets. Once this is agreed it should be possible to communicate the progress against each of the targets annually. Whether an annual delivery plan is the best method for this is down to those who manage the process. However honest feedback on achievements and failures must be communicated, as many of us are pinning hope that this process will “reverse the decline of biodiversity”.

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 recent Nature Fund was a needed boost to achieving some elements of “reversing biodiversity loss”. Whether this Fund will be available each year needs to be communicated and if it is, we believe its integration into the Nature Recovery Plan is essential.

Ref. 0091 - John Bowers

We all depend on the environment. It provides the air we breathe, the water we drink and the food we eat. Wales cannot import air. It imports very little water compared with England. Wales would probably be more prosperous if we ate more local food and imported less.

Please consider the following risks in any Nature Recovery Plan:

1. Natural Resources Wales

Reports of failures over 20 years to act against sewage pollution in Llyn Padarn are worrying. NRW admitted failings on behalf of the former Environment Agency only after a Judicial Review.

Welsh Ministers' conduct over the proposed race track near Ebbw Vale is also worrying. It suggests that it is acceptable to threaten NRW whenever their comments displease a member of the Welsh Government. Public Servants should "speak truth to Power". They should not guess how much truth will lead to cuts in their budget and more redundancies for colleagues.

2. Priorities

New road schemes in Gwynedd have been accompanied by expensive bat bridges and bat lights. Do voters believe that bats are more important than people as a result?

Could the Welsh Government have used the money more effectively?

3. Co-operation

Advice from the Welsh Government on what to do when if a protected site is being damaged by unauthorised development would be useful. I suggest that NRW should prosecute if the evidence is sufficient. NRW – not the Imperial Treasury – should keep any fines imposed. The local planning authority should take enforcement action to remedy the loss of amenity from unauthorised development following a successful prosecution. NRW should supply evidence and a witness should the developer appeal against the enforcement notice.

A single visit from one regulatory authority should be followed by a co-ordinated approach for Special Areas of Conservation, Sites of Special Scientific Interest, Protected Species and Uncultivated Land.

Common standards for witness statements should be agreed and observed.

4. Boundaries

The line of the recent road improvements south of Dolgellau was chosen to

minimise the effect on the Special Area of Conservation. Land of equivalent or greater ecological importance outside the designated boundary was taken.

Boundaries may create difficulties for nature recovery on the seashore and below high tide. The Crown claims ownership of the foreshore. The Crown cannot be subject to effective enforcement action under the planning system. The Welsh Government has limited powers over fishing.

Ref. 0092 - South East Wales Biodiversity Records Centre

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.

This consultation document appears to view Wales's natural resources primarily as a commodity to be managed and (sustainably) exploited for societal benefit. Instead we believe that there is a huge intrinsic value in biodiversity – it deserves to be protected and conserved for its own sake, regardless of whether it has an apparent monetary or practical value for the benefit of humankind. Each ecosystem (that provides services for humans) is made up of an assemblage of species, some of which may (currently) be of no apparent 'value', although each species may play a crucial role in the balance of that ecosystem.

Building the resilience of our ecosystems is a worthy aim, but this is best achieved by taking actions such as preventing them being damaged and fragmented, protecting them from development or disturbance, or promoting and resourcing proper management regimes.

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

The ambition statement does effectively capture the approach, although, as previously stated we have reservations about this approach. Whilst it is essential as a first stage of any biodiversity strategy that the aim is to 'reverse the decline in biodiversity', it does not seem sufficiently ambitious for a national strategy to aim no higher than this. Instead the strategy should have a shorter-term aim of reversing decline and a stated longer-term aim of enhancing biodiversity, not just by building ecosystem resilience, but by actually increasing the health of populations of native flora and fauna (including genetic diversity).

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

The goals as presented seem sensible and are well-aligned to the ambitions of the

strategy. Due to the nature of the business of SEWBReC, our comments will be focussed on two goals.

To achieve 'no net loss' of biodiversity

If this implies that a system of biodiversity off-setting is proposed, then we have serious concerns. Such a system could lead to biodiversity being viewed as a tradable commodity which can be destroyed in one location, provided an appropriate area of land is set aside in compensation. Ecosystems in Wales have developed over tens of thousands of years and cannot just be replaced by creating an equivalent (or often quite different) patch of habitat in a less inconvenient location.

If 'no net loss' doesn't imply the establishment of a biodiversity offsetting system, then it is an unambitious goal, that implies that biodiversity quantity matters more than biodiversity quality. The baseline measurement is also crucial if 'no net loss' is to be achieved. For instance does this aim to achieve no loss from the current situation? If so, we are starting from a low starting point. Does this imply that we should accept that catastrophic declines seen by many species in recent years (e.g. farmland birds) as irreversible and there should be no ambition to return these species to a more favourable status?

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

This is a laudable goal and one that is essential if we are to have any hope of achieving real benefits for the biodiversity and wider environment of Wales. At a strategic level there are a number of problems that need resolving.

Firstly, the Wales Biodiversity Steering Group (WBSG) was dissolved a while ago without any form of consultation with the bodies that made up its membership. We believe that it was deemed to be too large to be able to function properly. We feel that was simply not the case and was instead just an indication of how many key players there are that need to work together to achieve our collective goals. We were told that the new Wales Biodiversity Strategy Board (WBSB) was a high-level strategic board and that representatives there would be chief executive level. The Welsh Local Records Centres (WLRCs) were represented at the old WBSG, but as we do not have a single chief executive, we were not invited to join the WBSB (despite several requests) and have therefore lost our voice at the national level. The WLRCs should be key players in any work to strengthen the evidence base in Wales and yet our strategic input to achieving this goal has not really been sought thus far.

A fantastic mechanism used to exist in Wales to discuss issues of biodiversity information sharing in Wales – the Wales Environmental Information Forum (WEIF) and its associated, action-focussed spin-off the Wales Environmental Information

Steering Group (WEISG). Unfortunately these initiatives were not properly resourced or supported by WG and were victims of the period of planning and gestation of Natural Resources Wales. Key staff in CCW were seconded to the 'single body' or had their roles significantly altered, too many important actions fell to WLRC Managers who had no additional capacity, resources or influence to make them happen and ultimately, and with regret, WEIF and WEISG fizzled out. These initiatives should be reinvented, re-launched and reinvigorated to drive forward a new agenda for building the best biodiversity evidence base in the UK. Most importantly this work should be properly resourced, preferably with a full-time dedicated WG funded/based officer (as is the case in Scotland, which based its Scottish Biodiversity Information Forum on the Welsh model, before its demise).

The Nature Recovery Plan consultation quite rightly places great emphasis on the need to strengthen our collective evidence base. This cannot be achieved by reinventing the wheel, but instead by properly resourcing those who are already working on this task. The WLRCs employ approximately 15 highly skilled and dedicated specialists in biodiversity data management and dissemination. At present the WLRCs are working on shoestring budgets with very inconsistent buy-in from Local Authorities, no buy-in from WG and uncertainty over future NRW funding. The WLRCs could play a pivotal role in improving the evidence base in Wales and should be heavily involved in both the production of SoNaRR and the next State of Nature in Wales report. In fact, we believe that a great way of working together (as well as being seen to work together) would be for WG/NRW and NGOs to work together to agree a single evidence baseline that would form the basis of both SoNaRR and the State of Nature report.

4. Are the actions proposed right and adequate?

We realise that this is a high-level strategic document, but even so, actions need to be far more detailed if they are going to be meaningful in any way and if they are going to have any chance of yielding the intended benefits for Welsh biodiversity. In the next stage of delivery of the NRP, we will need to see more detailed actions which are assigned or championed appropriately and which, as far as possible are SMART.

Again, due to the nature of the business of SEWBRReC, our comments will be focussed on a few relevant action areas.

Funding our partners

During the recent period of national austerity, it seems that funding for biodiversity has been disproportionately reduced. Many local authorities in Wales have dramatically cut their teams that deal with ecology and biodiversity. For example, in recent months the ecology teams in Cardiff, Torfaen and Vale of Glamorgan have all been cut from two members to one. This leaves ecologists who are unable to

perform anything but the most essential tasks, meaning that their work is increasingly focussed on meeting legal obligations (e.g. dealing with protected species and occasionally S42 species) rather than dealing with biodiversity in its broader sense. Support for Local Biodiversity Partnerships will continue to decline in these and other areas (we are aware of local authorities where there is no longer an active partnership) to the detriment of biodiversity. The ability of these local authorities to buy into the products and services of the Welsh Local Records Centres is also constantly reducing. This means that decisions are being made in the light of incomplete evidence and as a result biodiversity is likely to be suffering. SEWBReC now only supplies services to eight of the twelve Unitary Authorities in South East Wales, with gaps including the three cities of Cardiff, Swansea and Newport.

We remain to be convinced that the Nature Fund will yield any significant gains for nature in South East Wales. Only one of the nine priority areas (South Wales Valleys) lies within our area and some local authorities are entirely outside of priority areas. Although the announcement of the £6m fund was made at the 2013 Royal Welsh Show, it was well over a year before any projects were announced and even now it is unclear how all of the money is being spent. We understand that a significant proportion of this fund has been awarded to NRW for work which we believe should have already been part of their remit. To date SEWBReC has only been asked to participate in one Nature Fund project, which leads to the suspicion that issues of data gathering and management have not been properly considered in all other regional projects (despite this being flagged as a cross-cutting issue by the WLRCs).

Improving the Evidence Base: Research, Monitoring and Surveillance

The Welsh Local Records Centres hold the most comprehensive biodiversity database in Wales with over 7 million species records including over 800,000 records of legally protected and/or Section 42 species. It is imperative that this data is utilised as much as possible to inform any research, monitoring or surveillance programmes. It is important that past support for and investment in the WLRCs is continued, to enable us to continue to improve data flows, to improve data quality and to utilise technology to enable the maximum benefit to be obtained from an ever-improving evidence base.

The NRP consultation document states (on page 22) that work has already been started by the WBSB to 'update biodiversity data'. As WLRCs have no seat on the WBSB, we are keen to learn more about what this work is and hope to be fully engaged in the near future.

A crucial paragraph of the whole document from SEWBReC's point of view (page 22, paragraph 5) states that:

“Transparency of and access to the developing evidence base is key. We will utilise the developing Information Hub, to continue to improve the sharing of information on nature, including making better use of information gathered through monitoring undertaken for the planning system, so that we have a better picture of the local state of nature and can potentially reduce requirements for additional evidence gathering on smaller development proposals.”

We agree that access to the evidence base is vital, but are keen that the Information Hub does not attempt to reinvent the wheel as far as access to existing biodiversity data is concerned. The WLRCs have recently developed and launched (and are already refining) tools to allow online data access. WLRCs will be happy for the Hub to signpost the availability of this data, but would not wish to see any systems set up which by-pass WLRCs or which adversely affect the viability of our business models.

This paragraph seems to explicitly, but rather inexplicably focus on one issue of making better use of data gathered through monitoring undertaken for ‘the planning system’. It is unclear to us exactly which data is being referred to here, as very little biodiversity monitoring is undertaken as part of the development control or local development planning systems. If this refers to ensuring the unfettered onward sharing and use of data that is presented as part of a planning application, then this is something that we whole-heartedly support. We would be very happy to work with WG staff to advise on simple changes that could be made to the planning process in Wales to make such data sharing obligatory. At present vast amounts of commercially gathered data is not shared (and is often actively withheld) for apparent reasons of data ownership and ‘confidentiality’, but we believe that having to actively share data as a pre-cursor to obtaining a planning permission would instantly solve this problem (although resources would be needed if we were to try to clear historical back-logs of such data).

Encouraging effective Communication and Engagement

If communities are going to be engaged and enthused, it is absolutely vital that a range of better terminology and language is developed and promoted. It has been a hard task over the past 20 years to engage the public in ‘biodiversity’ protection and conservation. As things stand, it would be nigh on impossible to engage or enthuse anyone with phrases such as ‘natural resource management’. At the 2014 Wales Biodiversity Conference in Cardiff, a WG official stated that there was a perceived difficulty with explaining the terminology of ‘ecosystems services’ to the general public and that was why WG had adopted the term ‘integrated natural resource management’. This proved that there is a huge barrier to overcome - as well as causing raucous laughter from the gathered expert audience who saw the irony that this new, improved terminology was absolutely no more accessible (and possibly even worse)!

Mention is made of how the Information Hub will be used to increase public involvement in monitoring nature. For this to take place, there will have to be a huge improvement in the appeal of the Hub (compared to the initial version, which could be adjudged to be rather dry and unappealing). We also wish to encourage WG to exercise some caution when moving towards a reliance on increasing 'public involvement in monitoring nature'. Citizen science and the use of technologies presents a huge opportunity, but should never be seen as a silver bullet to replace the need for monitoring which is detailed, rigorous, scientific and professional, even if resources need to be set aside for such work. In the field of biological recording, there are less and less paid experts or taxonomists working in the ecology profession. There has been a long-term trend towards reliance on the expertise of (a diminishing number of increasingly overworked) volunteers. The move towards increased citizen science could generate massively increased volumes of data which will need to be verified by these volunteer experts and at some point a tipping point will be reached where the system begins to break down.

Providing better Governance to benefit nature

We have already mentioned our concerns about the changes made to the way the Wales Biodiversity Partnership works, as well as about the demise of WEIF and WEISG. In addition, there has been a tangible weakening of local biodiversity partnerships in recent years. It is imperative that any refresh of governance that occurs fully takes these issues into account. The refresh must acknowledge the passion, commitment and enthusiasm of the professionals and volunteers who have worked tirelessly for the conservation of Welsh biodiversity over the past decades. These people have become noticeably less motivated in recent years as biodiversity issues seem to have returned to the margins, after a period where our hopes were raised that such issues were increasing in profile and importance (legally and politically). As well as re-engaging these people, the refresh must also recruit, train and fully engage a new generation of committed conservationists.

5. What additional action would you wish to see?

As previously indicated, SEWBRReC's priorities for enhanced actions would include:

Data flow and data sharing: Making data sharing the default position for all parties who are commissioning or collecting biodiversity data; ensuring data is gathered once and used many times.

Improving taxonomic skills: Ensure taxonomic skills are taught at all stages of education; support courses to upskill professionals and volunteers; employing or contracting sufficient specialists in key organisations.

Support for volunteer recorders: Be aware that much quality control within the

biodiversity evidence base relies upon the expertise of volunteers; explore methods of recognising and valuing the contribution of volunteers.

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

Businesses must take their corporate environmental responsibility seriously, including their direct and indirect impacts on biodiversity. Proper engagement with business should be achieved through allocating WG resources to ensure that businesses are aware of the NRP and of the actions that they need to take.

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

This has been covered by our response to governance issues in section 3 (above), namely fine tuning the way the WBSB and the wider Wales Biodiversity Partnership works and the need to reinstate and sustainably support a successor to WEIF/WEISG. In addition the vital role of local biodiversity partnerships must be encouraged, maintained and supported.

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

This is an issue for resolution between WG, NRW and the WBSB. We accept that resources are limited, but believe that more can be done with less, provided all parties work closely together and are not competing for the same territory. Good communication and improved governance structures are crucial to making this happen.

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

These issues have already been adequately covered.

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

These issues have already been covered in our response to evidence base and communication issues in section 4 (above). The key issue is to work together for mutual benefit, to respect existing systems that work and to ensure that information management is viewed (and properly resourced) as a vital part of efforts to enable the recovery of nature in 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?

As previously mentioned, we fear that the terminology of ecosystem services and integrated natural resource management is terminally flawed and needs to be revisited before any attempt is made to communicate what is being done to a wider audience.

We have no specific views on how regular reporting should be, but believe that once again the wheel should not be reinvented. If WG is supportive of BARS, it should be adapted and used to communicate progress of the NRP. Regular and relevant communication is vital across the whole biodiversity sector, using all available channels.

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.

Gaps in the scope of the actions have already been highlighted in section 5 above.

Whilst we welcome the opportunity to comment on this consultation, we remain concerned that such a strategy will be too little, too late to reverse the downward trend in Welsh biodiversity. There is a huge leap between the development of a strategy such as the NRP and the actual changes on the ground that are needed to help protect and conserve Welsh biodiversity. A huge amount of urgent work is needed if we are to collectively achieve the changes that are needed to meet our biodiversity obligations and targets, and this work needs to be prioritised and properly resourced at all levels.

WG is responsible for orchestrating some major threats to biodiversity through development (such as the M4 re-routing across the Gwent Levels) and has seemingly disregarded its own statutory duties under various legislation including its own NERC Duty (such as the way it promoted the scheme to insulate Council houses with apparent disregard to breeding bats and birds and the way in which the work of Departments dealing with agriculture, transport, business and tourism is apparently conducted without adequate regard to the existing biodiversity evidence base). We firmly believe that the WG needs to get its own house in order before it can expect others to do the same and a better example needs to be set.

Ref. 0093 - Wales Biodiversity Partnership's Species Expert 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 society? If not, what else do we need to consider?

SEG feels that immediate action is required for species and habitats to promote nature recovery in Wales. The overall ambition of achieving ecosystem resilience by focussing natural resource management is a desirable outcome for the broad environment but will not address the complexity of species- habitat interactions and intra-species interactions. For the Plan to explicitly deliver for nature there must be recognition of the intrinsic value of nature in combination with societal value.

In addition, successful projects and mechanisms carried out by many organisations which are currently delivering biodiversity conservation need to be recognised in the Plan.

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

SEG believes the ambition should go beyond 2020 and extend to 2050 as outlined in the Convention on Biological Diversity Strategic Plan for Biodiversity. Public support will be essential to deliver the Nature Recovery Plan and mechanisms to promote the understanding of ecosystems, habitats and species in Wales are required.

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

The goals in principle are acceptable but require clarity and reinforcement through the inclusion of clear targets, timescales, and outcomes. This would provide a mechanism through which organisations, partnerships and individuals can support and engage with the ambitions of the Plan. SEG recommends that explicit reference to the conservation (protection, restoration, and enhancement) of priority habitats and species (including ecological communities/assemblages of species) is included in the final Plan to deliver nature recovery in Wales.

We would suggest that the goals could be usefully amended to the following:

- Goal 1 - To improve degraded habitats at scale

The 'improvement' habitats at scale needs to cover restoration, enhancement and maintenance of habitats and extend to include both habitats and species populations.

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

SEG agrees that enhanced habitat connectivity will be an important factor but notes that interventions and mechanisms will be required to deliver increased connectivity and that other key drivers of biodiversity loss need to be addressed. Action on invasive species which hinder riparian connectivity and diffuse pollution is required - both of which also have a significant negative impact on native flora and fauna. The role of agri- environment schemes in species and habitat recovery and connectivity needs greater emphasis in the Plan as they cover a significant area of Wales.

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

Measures to improve the management of the environment is welcomed. However clarity is required to define the term 'highest quality environments'. Does this include SSSI's and the series of Wildlife Sites in Wales? National Parks and Areas of

Outstanding Natural Beauty cover significant areas in Wales and whilst recognising the conservation efforts to date in NPAs/AONBs they have the potential to deliver more for nature. Overall the management ambitions should be clearly stated and put into the context of restoration of the wider environment to produce a true landscape-scale approach.

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

SEG would welcome a more ambitious framing of the 'no net loss' policy to include 'net gain' and a robust mechanism to record biodiversity loss. The complexity of ecosystems and the myriad interaction of species preclude replacement or relocation in all but the most general habitats. Habitat re-creation and translocation should be seen as a last resort and not applied to ancient habitats or habitats that cannot be created due to their importance for biodiversity e.g. sand dune systems or due to hydrological constraints for example.

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

SEG agrees with this goal. The governance framework needs to be supported and financed and integrate with other sectors including agriculture, forestry, fisheries, business etc.

The Wales Biodiversity Partnership has the reputational authority and history to support delivery of the Plan and a strong role for the WBP Ecosystem and Species Expert Groups, WBP working groups and the WBP support team is advised.

4. Are the actions proposed right and adequate?

In broad terms the actions are welcomed although an emphasis on continuation of projects and successful conservation interventions is lacking in the Plan.

Specific comments on each action are given below:

- Putting in place effective natural resource management

As indicated earlier the focus on natural resource management will not cover specific species and habitat actions which require specialist interventions. There is also no reference in the Plan to how this approach will deliver for species and habitats.

- Delivering a Welsh National Marine Plan

Management of activities in the marine environment and the creation of a robust and ecologically coherent series of marine conservation zones series are required.

- Facilitating cross-sector policy integration

The focus on integration is important both within sectors and across sectors, in particular agriculture and forestry. WG need to embed the Plan into departmental activities and across public sector bodies. Strengthening of the NERC biodiversity Duty with due consideration to S42 species and habitats would benefit the ambition of enhanced cross-sector integration.

- Funding our partners

SEG believes funding should be targeted to specific targets and milestones relating to the 2020 biodiversity targets and the ambitions of the Plan and longer-term sources of funding identified under a strategic framework. Coordination and integration of funding within the Nature Recovery Zones and wider funding initiatives is advised to maximise delivery.

SEG partner organisations have successfully delivered partnership projects benefitting native flora and fauna and enhancing connectivity and supporting these organisations should be a key strand of funding initiatives. For example Butterfly Conservation work on habitat management for the High brown Fritillary; British Dragonfly Society work on habitat creation and connectivity for the Southern Damselfly in the Preseli Hills; Wildlife Trust of South & West Wales Red Squirrel initiative in mid-Wales; Amphibian and Reptile Conservation work creating and connecting habitat for herpetofauna. The projects not only benefit target species - enhancement of habitat and benefits for a whole range of other species and the provision of ecosystem services are additional key benefits. There are many other examples and SEG would be happy to provide further examples.

The REF Fund was notable in this respect being a dedicated ecosystem fund benefitting species and habitats and peer reviewed by ecosystem and species group experts.

- Identifying financial instruments

With sufficient capacity to support bids, Wales could draw down more European LIFE Funding. The RDP has the potential to offer consistent and targeted funding of biodiversity initiatives in the rural environment if aligned with the ambitions of the Plan and the 2020 Biodiversity targets.

- Reviewing designated sites and species

SEG strongly cautions against watering down SSSI's designations and clarity is required around the scope and purpose of the review. SSSI's represent a core 'nature network' supporting robustly designated flora and fauna, ecosystem functioning and services. SSSI sites in combination with N2K sites, Wildlife Sites and the wider countryside offer the potential to link up a range of designated and non-designated sites into a coherent series of ecological networks. It should be noted that the current suite of SSSIs is incomplete as it does not encompass all

sites of high biodiversity value, and there are sites outside of the SSSI series that require designation or recognition in legislation and appropriate management.

- Monitoring and review regulatory instruments

An audit of regulatory instruments and their impacts on biodiversity would be welcomed together with identifying ways in which regulatory instruments support sustainable development principles including biological diversity.

- Improving the evidence base: research, monitoring and surveillance

There is merit in the development of an evidence base incorporating knowledge and information sets from Welsh Government, NRW, NGOs, Local Record Centres, the WBP Evidence Gaps project and BARS. The Evidence Gaps Project has forged links with academics and institutions across Wales and beyond. The monitoring work carried out on NTK and SSSI sites has particular relevance and mechanisms to enhance information sharing with landowners and conservation managers should be sought.

National species monitoring schemes have a vital role to play in collation of the evidence base e.g. Bat Conservation Trust National Bat Monitoring Programme; BTO Breeding Bird Survey; Mammal Society National Mammal Monitoring Scheme; Butterfly Conservation Butterfly Monitoring Scheme; British Dragonfly Society Dragonfly Watch; Plantlife National Plant Monitoring scheme; Amphibian and Reptile Monitoring scheme; Wildlife Trust Mid Wales Red Squirrel Partnership and Water Vole initiative; River fly monitoring schemes; Wildlife Trust Living Sea initiative

Citizen Science schemes e.g, RSPB Big Garden Birdwatch; Buglife Oil beetle Survey and the OPAL Bugs Count survey have great potential to engage the public and develop a new audience. Local Record centres in partnership with LBAPs and NGO's deliver 'BioBlitz' events with a focus on increasing the evidence base by recording species lists for areas that are under recorded.

- Encouraging effective communication and engagement

SEG strongly supports this ambition. At a national strategic level, a reinvigorated internal communication programme from Welsh Government and NRW together with a targeted focus on external communication would be welcome. The use and support of existing mechanisms is advised and NGOs' and LBAP partnerships have considerable knowledge and expertise in delivering effective communication and engagement programmes and their continued support is required. As noted above, Citizen Science schemes and 'Bioblitz' events targeted at the appropriate level offer engagement opportunities and direct contact with nature.

- Providing better governance to benefit nature

The refresh of the Wales Biodiversity partnership and governance arrangements will provide clarity and a level of certainty. The Wales Ecosystem Groups, Species Expert Group, WBP Working Groups, LRC's and LBAPs offer a strong focus and partnership ethos but require support financially and strategically. In contrast to the rest of the UK, these groups have remained active and as such valuable contributors to nature recovery in Wales.

Scientific evidence together with societal choice can effect improvements to our ecosystems as long as the proposal is framed correctly and recognises the strengths of public understanding in certain areas and the gaps in understanding in other areas. Societal values underpin environmental legislation and were the driving force for protection of the environment including priority species and habitats.

5. What additional action would you wish to see?

- Site specific and species management

A focus on the most vulnerable, rare and fragmented species and habitats is required to arrest the decline in biodiversity. Wales' has the ambition, experience and know how to achieve this given the resources and a sufficient commitment to the process from Government and partner organisations.

Natural Resource Management principles will take time to operationalise -targeted conservation interventions can deliver nature recovery and ecosystem resilience in the immediate timeframe.

- Ensuring linkages with key statutory instruments

The emerging Well-being of Future Generations Bill the Environment (Wales) Bill and the Pollinator Action Plan are key opportunities to maximise delivery of biodiversity targets. The relationship of the Nature Recovery Plan needs to be articulated, ideally there would be a direct link from the Future Generations and Environment (Wales) Bill through to the Nature Recovery Plan.

- Ensuring nature conservation is properly funded

A commitment to funding and support in leveraging funding will be required to achieve the ambitions of the Nature Recovery Plan. Specific goals within the Plan will require targeted funding to ensure successful outcomes.

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

A strategic steer to business from WG would be welcomed. WG could offer a suite of measures to business including advice on environmental issues, incentives to work with NGOs and recognition of best practice. Expanding wildlife-based tourism could be an opportunity to diversify the rural economy and minimise risk in the event

of diminishing EU agri-environment subsidies.

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

A positive and mutually reinforcing relationship between Welsh Government, its agencies and NGO's can assist with the delivery of government aspirations. Support for the Nature Zone Area coordinators will greatly benefit the integrated approach and promote shared and adaptive learning. A strong and effective WBP with a clear mandate will help with the delivery of the Nature Recovery Plan.

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

A funded partnership with a lead officer is the most effective ways of integrating outcomes and coordinating budgets. At present there is limited scope to coordinate and integrate projects due to capacity issues. Guidance and a steer from WG and NRW would be useful in this respect.

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

A clear sense of who is tasked for each outcome would be very useful. Support for Local Record Centres and BARS would reduce duplication in data management, data sharing and reporting. The WBP Species Expert and Ecosystem Groups offer a strong partnership based network and are well placed to assist delivery.

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

An all-Wales information hub is welcomed in principal as a front end to the existing LRCs and NBN toolkits. For example, building on the Welsh Local Record Centres all-Wales Data Access Tool should be investigated.

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?

A combination of short term (5year) plans and longer term plans will be necessary with associated work plans and annual review/health check. The above is precluded by clear targets and milestones for each goal including communications and engagement goals. It would be very helpful if data standards followed the 'collect once and use anytime' principal so they can be incorporated into existing statutory reporting frameworks e.g. Article 17 reporting.

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.

SEG sees the consultation document as a narrative outlining nature recovery

principals and not a Plan in the strictest sense. There are encouraging elements to the plan around addressing negative factors of biodiversity loss, integration, evidence gathering and engagement and SEG recognises the considerable efforts in producing the Plan. However as noted in previous sections, the focus on Natural Resource Management as currently understood currently looks better suited to management of the wider countryside, e.g. flood protection and soil conservation and the Plan does not sufficiently focus on recovery of species and habitat diversity which are in continuing decline in Wales. Overall the Plan needs to be ambitious with clear targets, fully resourced and demonstrate ownership and accountability

Wales position on the western seaboard of Europe, humid climatic conditions and diverse geology is reflected in a diverse species assemblage with species populations of national and international importance. These include rich communities of bryophytes, lichens and fungi, arctic-alpine flora in Snowdonia, key Marsh fritillary butterfly sites, seabird colonies of world importance and a rich marine assemblage. Sustainable development principles enshrine the importance of biological diversity and leaving an undiminished legacy for future generations. Biological diversity is fundamental to human well-being as much as in its existence and for the benefits it provides to society. Our responsibility in Wales as custodians of the natural environment is to put in place clear, targeted and resourced plans to enhance biological diversity now and for future generations. SEG's ambition is for the actions in the final Plan to be of sufficient scale and ambition and that actions transcend short-term political cycles to truly delivery nature recovery in Wales.

Ref. 0097 - West Wales Biodiversity Information Centre

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?

Not with the focus. To reverse the decline in biodiversity is good to see explicit in the ambition. The mechanisms as to how this will be achieved within the ecosystems services approach are still largely untested and unclear. General terms such “building resilience” and “integrated natural resource management” are still not clearly understood in terms of the outcomes they might have for biodiversity. Even the quote used (p7) is equivocal in the role ecosystem resilience might play.

Consider what is already working and commit to maintaining initiatives within the plan. Again, there is no clear commitment in the language used in relation to the role of protected areas (p8) which have played a crucial role in retaining the biodiversity we currently have. Words such as “should” and “could” in this context are worrying and we are left with the concern that unless a benefit can be demonstrated across a range of ecosystem services, some of these areas and

species they support, may suffer.

The wider countryside has a crucial role to play if we are to meet our targets and should be embraced within this plan rather than relegated because of being under pressure to deliver other services. The implication taken from the wording in this section is the acceptance that diversity cannot be maintained here and by extension of that line of reasoning, will decline. We do not agree that this is an appropriate position for government to take and certainly not if it is to meet the ambition.

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

Not fully, see above Q1.

We would like to see specific reference to increasing biodiversity in the wider countryside as contributing to achieving the ambition. This would work alongside and enhance other protected sites and connectivity improvements, increasing species diversity and range. It would have a positive effect on species resilience which in turn would contribute to ecosystem resilience. Add, “across all the landscapes of Wales” for the sake of clarity and affirmation of intent.

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

To “achieve ‘no net loss’ of biodiversity” does not match the ambition statement. This “goal” is out of place here in this higher level strategy. It is under this goal that agriculture and forestry first appear. It is not enough to include this as a half way goal to demonstrate achievement in some sectors whilst we seek to achieve a greater ambition for Wales in others.

It is difficult to make any comment on the framework of governance without more specifics but it should have a structure that is inclusive and allows stakeholders to contribute their knowledge and experience. With over 6 million species records for Wales, it would be thought natural that Local Record Centres would have contributed to the first State of Nature Report, but that was not the case.

Identify the key negative factors more clearly and explicitly.

4. Are the actions proposed right and adequate?

The focus for action on better understanding and better evidence is welcomed. Key will be data flow and quality and we, as part of the successful LRC network in Wales are well placed to play a significant role in terms of species data and in making raw data meaningful and useful to those responsible for delivery, e.g. planning authorities, trunk roads agents, consultant ecologists.

WG project funding such as the recent Nature Fund should recognise that appropriate timetables and timescales are needed if partnership working and long

term outcomes are to be successful. Biodiversity gains are not made in the short term.

Improving the evidence base is welcome. There is much good evidence already however much is not shared and/or is not available to those who need it in an accessible format. Whilst the Information Hub seeks to address these issues, WG is in a position to insist through the conditions of funding, that data collected is shared in an appropriate format.

Much of the need for additional evidence gathering is in relation to species disturbance, most often, bats and is therefore required by law. Better that the process is clearer up front and made more accessible through the hub (see Q6.) This will help to raise awareness of biodiversity issues where development is concerned.

Whilst we welcome improved communication and engagement, there is the concern that the Information hub aspires to reach too many audiences. It could be an incredibly useful resource for practitioners, researchers and to inform future policy and action. This may not be the same hub that is useful for community members and this disparity should be recognised and in some way addressed.

5. What additional action would you wish to see?

If the evidence is to be “robust” there must be confidence in it. Currently much of the collection and verification is being carried out by volunteer biological recorders. Their contribution cannot be under-estimated nor replaced by new “citizen science” initiatives. We must support the knowledge base as well as the evidence base.

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

Communicate the benefits to ecosystems services effectively, which will mean in part, using language that reaches the audience. By way of illustrating the point, a quote from Gerald Durrell was used recently in the journal, British Wildlife, “People think what I am trying to do is save nice fluffy animals. What I am actually trying to do is save the human race from committing suicide”.

In general, businesses like to promote their green credentials, and this seems to work better when they can ally with national campaigns. Close partnership with national initiatives, WG supporting conservation organisations and business with a view to the ambition of the NRP.

Streamline access to biodiversity information, use on-line services such as those already developed by LRCWales, keep it simple and clear what is required where development is being considered.

Many SME's criticise the planning system on grounds of expense and lack of clarity

in the information required resulting in delays and additional expense. Avoid confusion and ambiguity which is possible with well designed websites and link with planning portal.

Clarity, consistency and strong leadership should be displayed by WG where penalties are levied on transgressors. People generally like wildlife so there cannot be much in the way of bad PR to prosecuting, apart that is, from within the community or sector that is on the receiving end. Good examples from Wales here are; plastic bag levy, smoking ban.

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

In general we do work together well, so any support for local biodiversity partnerships is welcome as they provide a platform for coordinated action between LAs Wildlife Trusts and many other organisations at a local level.

We could suggest here a Wales Environmental Information Network (WEIN) as an alternative to the now moribund forum (WEIF), where member organisations not only shared information and experience but would in the future share data through the Information Hub. WEIF faltered partly from lack of adequate resourcing, relying as it did on the in-kind contributions in staff time from too few organisations.

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

Have mechanisms and structures in place to facilitate partnership and consortium working. Having said that, partnership working is already well established and working so it really needs the commitment from WG to support it financially, and acknowledging that outcomes beneficial to biodiversity are usually only delivered over the medium to longer term.

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

An adequately resourced WEIF/WEIN could communicate electronically in various ways, and this may be yet another function the Hub can carry out in relation to the information. (GBIF uses LinkedIn to circulate regular emails).

Ultimately it will be down to communication and the way that funding is organised. Bidding for projects encourages duplication, in some instances it not being in an organisations interest to acknowledge others' work. Longer term and core funding should be considered where there are outcomes that match the ambition of the NRP.

For practical project work, it is remarkable that in a country the size of Wales, real duplication can exist. By it's very nature, similar work is needed in different geographic locations and the work of WBP and LBAPs help to share the knowledge and experience and target best practice locally so support for these partnerships and networks should be maintained.

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

See responses to Q.6 and Q.7

If the information hub is to be useful there must be confidence in the data. Many organisations already deliver this and as an LRC, with experience and on-line delivery of robust, verified data and the all the processes that this requires, we should be consulted in its development.

It is worth stating here that Local Records Centres Wales already have in place an online data delivery system which can and is being accessed by some of the public sector bodies in Wales. This brings in data from all four of our regions covering all of Wales and delivers up to date biodiversity information on species, protected sites and more, direct to the users' desktop where it can be queried and reports generated.

Technology offers a variety of tools to provide webmapping, data download and data streaming. A service such as that of the LRCs above and data library, with signposting to external data sources only where necessary.

Data tends to be gathered with the specific purpose in mind and may not be useful to others. There are potential issues there for the NRP ambition in relation to data collation and dissemination which should be addressed at the outset of projects where data is being collected. WG is in a position to insist on data being in a format suitable and useful to the Information Hub rather than leave it as guidance in projects which they fund. Where species data is concerned this should be first to the LRC as the key provider to NRW and other public sector organisations.

There is no mention of data collection in the question which from vague wording in the strategic actions p22 we presume to be partly through citizen science initiatives and use of mobile technologies (Apps). To repeat the above, data formats and means of verification should be considered at the outset of projects in order that a degree of confidence can be attributed. This is necessary to maintain a strong evidence base and that this will not be diluted over time.

Although we have attempted to address some of the issues that may arise and offer recommendations, concern remains that the IH is seen as an "all-singing all-dancing" tool in this document. It's contribution to the NRP will be the main access point for a wide audience (expert to novice) to access and collect a range of environmental information under two different actions (p22). We are concerned that this could develop into a large and cumbersome site and be little or rarely used and not achieve it's ambition or that of the NRP. Many developers prefer smaller more specific sites tailored to the users purpose. This is all possible with good design so attention should be paid to this at the outset.

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?

Annual report on progress would seem a sensible timescale and BARS would be a key source of much of this information. A longer term programme and review is needed which could be timed to feed information into the reports already announced (SoN, SoNaRR) so the interval could be chosen to suit this.

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.

Throughout the document there are references to the Aichi targets which are clear and understandable. The NRP seeks to address these targets in a language that is vague, lacks clear definitions and we feel is open to more than one interpretation and the concern is that can be used to demonstrate meeting the ambition but not fully meeting the Aichi targets.

Addressing key issues that negatively impact on biodiversity is crucial and although this document is aimed at a strategic level, it could better address the fact that many such actions are carried out by individual householders, landowners and businesses. If Wales is to achieve the global targets quoted throughout, then we must engage everyone in reversing the trend and not write into our strategy that we are content that some do less and halt the trend. Make it easier for them to do more. Inform, educate and communicate with them.

There appears to be a disconnect with Local Authorities in the document. For example business deserves specific mention whilst LAs have a huge role to play in reaching our biodiversity targets. We acknowledge that some of this will be addressed through the Environment and Planning Bills but they are inevitably an important part of the many partnerships and it seems peculiar that they do not feature more prominently in the NRP.

Ref. 0098 - Bumblebee Conservation 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?

NO.

Whilst we welcome the ambition outlined in the Nature Recovery Plan, we do not feel that the natural resource management approach which is outlined will deliver for

nature conservation in the form and breadth that is required to halt the loss of biodiversity.

We do not feel that the focus of nature conservation effort should be directly linked with benefits to society. Environmental services are essential to human wellbeing, and this should be highlighted, but we should not prioritise protecting or restoring biodiversity on the basis of benefits to humans. The Nature Recovery Plan for Wales must recognise non-monetary reasons for a healthy natural environment - all government policy and legislation must be proofed for consistency with the Government aspiration that the value of nature is fully reflected in decision making.

The plan does not adequately outline an approach to protection and management of important sites, or conservation measures for important habitats and species. Conservation (protection, restoration, and enhancement) of species and habitats is recognised as the only sure way to measure progress and eventual success in delivering an ecosystem approach (and integrated NRM) and therefore a fundamental measure of sustainable development. It also provides a powerful metric for communicating to the people of Wales progress in this regard.

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

BBCT does not agree with the ambitions statement as presented. We would suggest that the ambition statement should mirror the international and EU obligations on biodiversity:

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.

If this is considered to be too cumbersome then it could be shortened to

To halt and reverse the loss of biodiversity, and the degradation of ecosystem services by 2020

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

The goals in the final Nature Recovery Plan should be made stronger and clearer while remaining consistent with the strategic style of the plan.

We recommend that there be explicit reference to the conservation (protection, restoration, and enhancement) of priority habitats and species (including ecological communities/assemblages of species) in the final Plan to ensure we see proper progress for the recovery of nature in Wales. For example:

‘Maintain and restore viable populations of all naturally occurring species and

subspecies across their natural range and maintain their genetic diversity;

Maintain and restore a full range of natural habitats and ecosystems to a healthy functioning state, enhance critically scarce habitats, and sustain the more modified ecosystems in production and urban environments that; contribute to social, economic and ecological resilience, and the capacity to adapt to climate and other forms of unavoidable change'.

4. Are the actions proposed right and adequate?

We recommend that the actions are made clearer, stronger and ideally more in line international targets/goals such as Aichi.

Monitoring and surveillance - BBCT has set up a scheme called BeeWalk (<http://www.beewalk.org.uk/>). BeeWalk is a national recording scheme to monitor the abundance of bumblebees on transects across the country. These transects would be impossible without volunteers, who identify and count the bumblebees they see on an hour's walk each month from March to October. There are currently 19 transects in Wales, we are aiming to increase that number as well as the geographical coverage.

5. What additional action would you wish to see?

- Site specific and species management

BBCT would recommend that the Plan includes a clear recognition and commitment to site specific and species management.

- Ensuring nature conservation is properly funded

To achieve the aims and ambitions of government, nature conservation must be properly funded. Whilst there are many potential schemes for delivery of nature conservation projects, there will remain some aspects of this recovery plan that will demand specific project funding. We remain concerned that the ideology of natural resource management will be a euphemism for (continued) reductions in funding.

In order to deliver long-term and sustainable action for nature recovery, funding in Wales should be long-term – allowing organisations to deliver more effectively. Short term 'big wins' are unlikely to deliver effectively for nature conservation or society.

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

BBCT have been working effectively with businesses in Wales and across the UK. The role of NGO's and other small organisations in engaging with businesses must be recognised, and properly funded. Many businesses are keen to fulfil their

environmental commitments, and partnership working is often the most effective way to do this.

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

Welsh Government and its agencies must recognise that joint working is a partnership and not a one way process. It is as much about how government is able and willing to support the aims and objectives of the third sector organisations, as it is about how the third sector organisations can deliver government aspirations.

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?

The Nature Recovery Plan must clearly communicate the timescales involved to meet its objectives and targets, some of which may take decades to achieve.

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 document primarily sets out the principles by which the Welsh Government would like to manage the wider countryside, but it is not a 'plan'.

The Plan recognises that there have been successes in nature conservation, and this is welcomed. However, we feel that it would be beneficial to review past and ongoing schemes and projects across Wales, looking at strengths and weaknesses of a variety of approaches, and build on lessons learned. The Plan outlines a very new approach in Natural Resource Management, and it is by no means clear that this will deliver for biodiversity, and particularly for important habitats and species.

Ref. 0100 - Monmouthshire County Council

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?

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

Ambition: To reverse the decline in biodiversity and ensure lasting benefits to society by building the resilience of our ecosystems, by focusing on natural resource management.

It is agreed that there is a need for a revitalised approach as biodiversity decline is

still significant but it is considered that, based on what we currently understand about Natural Resource Management (NRM), the approach needs to go beyond this. However, building resilience is considered key to reversing the decline in biodiversity and future-proofing ecosystems. Land use change has been identified as a primary pressure of biodiversity change (UK NEA); natural resource management can only influence elements of this (e.g. agriculture & forestry). There are other elements relating to development pressures that it is not clear that NRM can fully influence. The Nature Recovery Plan needs to better recognise and support the opportunities of the Green Infrastructure approach to development and existing site management which can have benefits for the economy and society as well as delivering ecosystem services beyond PES.

It is welcomed that protected areas are acknowledged in providing resilient ecosystems but this alone is not sufficient, as demonstrated by the continued decline in biodiversity. Yes, the wider countryside is under pressure to deliver particular services “as efficiently as possible” but in order to maintain underlying diversity, this needs to be done as sustainably as possible.

It is suggested that reference to Natural Resource Management is removed from the ambition or that other strategic actions are added. The current statement feels very NRW-centric as NRM can only ever part deliver Nature Recovery in Wales.

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

The goals are extremely broad but it is accepted that these reflect the Aichi targets, CBD goal and EUBS.

It will be very important to include specific measures and targets for the final agreed goals which should have formed part of this consultation. Without appropriate targets it is difficult to determine what the effectiveness of the goals will be. Specifically;

- To improve degraded habitats at scale: how improved is improved? Will this be enough?
- To address key negative factors of biodiversity loss and increase connectivity significantly: what will these key negative factors be? Will there be mechanisms for other organisations to address these factors or is considered to just be an NRW role? Increasing connectivity is vitally important but it needs to be the right connectivity i.e. not the wrong habitats in the wrong locations.
- To improve management of our highest quality environments: is this just relevant to Protected Areas? What about Section 42 habitats and species? Many sites are SSSI quality yet have not been selected, their value is still immense.
- To achieve ‘no net loss’ of biodiversity: This HAS to be fundamental to any

strategy.

- To put in place a framework of governance to support delivery, working together across sectors and strengthening our collective evidence base: This already exists but it needs meaningful, long term financial support.

4. Are the actions proposed right and adequate?

Focus for action largely covers appropriate areas although much of the work proposed should already be happening through current systems e.g. in relation to designated sites and species. It is welcomed that Natural Resource Management is one of ten actions which illustrates a recognition that NRM cannot deliver all nature recovery. However, the actions are extremely broad and the detail of these will demonstrate the adequacy. It is therefore difficult to comment without detail of delivery mechanisms.

Facilitating Cross- Sector policy integration. Under this action, the Nature Recovery Plan needs to think beyond Welsh Government policies and Strategies and consider how links need to be made to policies and strategies of NGO's e.g. The Wildlife Trust's Living Landscapes and even Local Government Single Integrated Plans and Improvement Plans. Having high level strategy and policy will not be sufficient.

Identifying financial Instruments. It is welcomed that Green Infrastructure has been recognised as a delivery mechanism and that there will be money to promote investment in this. However, much more support in policy will be needed to properly enable this mechanism.

Encouraging effective Communication and Engagement. The Green Infrastructure approach will be invaluable in changing the places in which we live, bring nature into our town environments and making nature relevant to residents.

Providing better governance. This needs financial support in order to have any chance of working particularly in relation to local biodiversity action. It should be considered whether there could be shared roles in relation to Biodiversity Action between LA's and NGO's such as Wildlife Trusts as seen in England. In Wales, the LA's that have been able to maintain dedicated Biodiversity Officers have had successful Biodiversity Partnerships e.g. Newport and Caerphilly whereas LA's that have struggled to keep this role have struggled with the momentum of partnerships.

A main concern looking forward to the next 5 years is the ability of local government to deliver Nature Recovery. With the huge cuts that local government face and planned increased responsibility placed on us by Natural Resources Wales (protected species), the ability to deliver anything more than statutory requirements around the Habitats Regulations is very limited. Local Government will need financial and policy support for the delivery of Nature Recovery. The Environment Strategy for Wales worked very well in securing Biodiversity Champions and

ensuring Officers were employed to deliver however, this has been eroded with many LPAs no longer having a non-planning dedicated Biodiversity Officers.

5. What additional action would you wish to see?

The information missing is the detail of each of the actions. What is particularly poorly indicated is action related to agri-environment with no proper reference to Glastir anywhere in the Plan.

Recognition of the need to consider how we tackle Wildlife Crime.

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

Using mechanisms that already exist e.g. NGO's with business champion type schemes that promote changes and improvement to management like an eco-schools scheme. WG need to provide financial support to employ project officers to do this. Businesses get accreditation like they do for staff health schemes.

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

It has been suggested by another Local Authority that in order to develop a meaningful Nature Recovery Plan that there should be seminars like those held for the Environment Bill to attempt to engage all relevant organisations and sectors and secure meaningful delivery. The Nature Fund seminars were instrumental in setting up partners and projects, goals and actions that may never have been formulated without those fora.

We need to maintain a cross sector Wales Biodiversity Strategy Board (Nature Recovery Board) to ensure that the right people and sectors are involved in shaping actions and delivery mechanisms.

We need to take a multidisciplinary approach working across specialization to achieve a joined up approach.

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

Partnership projects in NRM areas will deliver integrated outcomes e.g. Green Infrastructure Strategies (LPAs) and Living Landscapes (Wildlife Trusts).

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

Ensuring delivery plans for geographical areas (including Area Action Plans) have ownership by all partners delivering for nature recovery. This is where the LBAP process often failed with little involvement by NRW (legacy bodies CCW, FCW and EAW) and limited buy-in of NGO's who have their own policies and strategy.

10. How can we best use the Information Hub to collate and disseminate

data and evidence?

The use of an Information Hub will be an invaluable way to ensure relevant bodies have information available to them for decision making and work planning. Access to academic studies can be very important particularly where guidance is lacking. With regards to information gathered through monitoring, if this is going to be meaningfully used, it needs to be meaningfully collected. The development control and licensing systems are failing to secure this. In order for it to be consistent and scientifically credible, guidance will need to be improved.

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

Annual delivery plan with reporting rounds every three years. Leaving it longer than this is too risky if the effectiveness of the Nature Recovery approach is not working as time is really running out!

Welsh Government
Biodiversity and Nature Conservation Branch
Rhodfa Padarn
Llanbadarn Fawr
Aberystwyth
Ceredigion
SY23 3UR

03 December 2014

Dear Sir or Madam,

Nature Recovery Plan Consultation

The Wildlife Trust of South and West Wales (WTSWW) is pleased to be able to comment on the above consultation. We have framed our response below in line with the questions posed in the consultation document.

In addition, following our answers to the formal questions, we have provided case studies which demonstrate how WTSWW presently delivers work that contributes to the ambition of the Nature Recovery Plan (NRP) and how we anticipate that we could contribute in the future.

We confirm that we do not object to our details being published alongside our response.

If we can be of any further assistance, or if you would like any further information or clarification regarding any of the points that we have raised, please do not hesitate to contact us.

Yours faithfully,



Sarah Kessell
Chief Executive Officer



South and West Wales
De a Gorllewin Cymru

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Member of the Fundraising
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Question 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?

We do not agree with the ambition as expressed. We do, however, agree with some of the principles contained within it. Our specific comments are:

- We do not support the use of terms that are in common linguistic use where their intended definition varies markedly from that common use. Specifically, the term 'resilience' has a specific definition with regard to the Nature Recovery Plan (NRP), which is different from the wider public understanding of the word. The understanding and application of this term is key to the success or failure of the plan, which therefore creates a risk. The ambition should be fully understandable in what it seeks to communicate without reference to a technical definition. Not to do this leaves the entire plan and its delivery open to misunderstanding and miscommunication, and consequently vulnerable to failure.
- For this reason, the ambition is much less specific, clear and communicable than the vision accompanying the CBD Aichi targets or even the European Union Biodiversity Strategy (EUBS) vision. Adopting language from these documents would produce a more robust ambition.
- We are concerned that it would be possible, with the current wording, to argue that the ambition has been met without actually succeeding in addressing the spirit of the plan.

Question 2: Does the ambition statement capture this new approach fully? What might be added?

No, we do not believe this is the case. We would like to see consideration of:

- Reference to the intrinsic value of biodiversity (this is explicitly mentioned in the EUBS vision and could and should absolutely be included in the ambition of the NRP).
- Reference to the fact that we need to understand the causes of biodiversity decline if we are to address them effectively.
- The language of the ambition as a self-contained statement is too vague, and cannot be interpreted correctly without reference to definitions (unlike the CBD and European visions). This should be addressed, or at the very least the ambition needs to be accompanied at all times by technical definitions of key terms such as 'resilience' and 'natural resources'.
- Lasting benefits to society are an important component of the strategy and discussion, but have no place in the ambition statement for a 'Nature Recovery Plan'. If they remain an integral part of the ambition statement we would expect a reciprocal arrangement where nature recovery was an equivalent component of ambitions for plans in the economic and social sectors.
- Consistency of language- it is a 'Nature Recovery Plan' and the ministerial foreword refers to 'nature' but the ambition references 'biodiversity'. This

is a relatively small consideration but adds to the difficulty in communicating the spirit of this plan to a wider audience.

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

- We would prefer to see direct adoption of the CBD strategic goals.
- The cross-referencing exercise between the NRP goals, and other goals we would be required to report against (pages 14 and 15), is weak, because the topics are so cross-cutting. This provides an additional argument for the adoption of the CBD goals.
- However, if we assume the goals as presented are taken forward, then:
 - “Improve degraded habitats at scale” does not carry ecological meaning, and is consequently impossible to deliver or report against.
 - What is meant by ‘scale’?
 - ‘Improve’ can mean many things. ‘Restore’ would be preferable.
 - What about ‘recreate’? This is key to meeting our targets.
 - Less diverse habitats are not necessarily less important; species richness is not the only relevant measure. Lowland raised bog for example is species-poor when it is good condition; increasing diversity is a sign of habitat degradation.
 - We need to identify, before we can ‘address’, factors causing biodiversity loss. ‘Reduce’ or ‘remove’ would be preferable to ‘address’.
 - We need to change management of all environments to maximise biodiversity gain, not ‘improve’ management of highest quality environments alone. Again, the word ‘improve’ is subject to multiple interpretations and should be changed to something more specific and universally understood, such as ‘restorative’.
 - ‘No net loss of biodiversity’ requires definition for the plan to be meaningful.
- The goals overall are an odd mixture of outcome and process, this should be addressed.
- The preface should recognise that the ambition is to reverse the decline in biodiversity, rather than building the resilience of ecosystems, which is surely the mechanism by which we achieve our ambition, rather than the ambition itself.
- The success of the plan based on these goals will depend entirely on the nature of the action plan that derives from them. Although this document is entitled ‘Plan’ it is in reality little more than a strategy, or framework. As presented, it is impossible to comment on its likelihood of success or adequacy to create the change that is required, because there is too little detail contained within it.
- Targets and outcomes need to be stated that are measurable and against which we can record success. There also needs to be a clear line of ownership and responsibility for these targets.

Question 4: Are the actions proposed right and adequate? Also:

Question 5: What additional action would you like to see?

- We would refer you to our comments above about the suitability of the goals, which would affect the actions proposed.

- This document is a strategy. Significantly more effort should be expended in producing a more detailed action plan to sit below this strategy. The current actions put forward are not adequate.
- It is impossible to comment on “effective natural resource management” without more detail on what this will look like- including a definition of ‘natural resources’. Natural resource management is critical to the delivery of this strategy, so a much greater expansion of what this means is required. The focus on natural resource management also ignores the significant achievements to date based on targeted species and habitat delivery: in many cases we understand what is required, but it is a lack of resource that is limiting rather than the need to re-think our approach. Species conservation work must remain a part of the strategy if we are to reverse biodiversity decline, and the importance of targeted species conservation must be recognised.
- We commend the inclusion and cross-cutting of marine policy issues, this is a significant step forward in planning a sustainable future.
- We agree strongly with the principle of facilitating cross-sector policy integration, and suggest that consideration should be given to changing the terminology to something stronger, such as a duty to enforce it. Welsh Government should also commit to ‘work with policy teams and portfolios to address biodiversity needs...’ within *all Welsh Government policies*, not just ‘relevant policies’, as stated. If we are to achieve the ambition, all policies are relevant. To illustrate this, the example policies listed (accepting that the list is not presented as in any way exhaustive) are only those which already do give some consideration to biodiversity- RDP, planning etc. Whilst we acknowledge that these do need to be strengthened, it is also critical to broaden the reach and include all sectors- where are the business development, and transport policies? The title says ‘cross-sector’ but the content is still not evenly distributed between the pillars of sustainable development.
- Funding our partners. There needs to be recognition that there is nothing wrong in ‘partnership for life’. Partnerships should be based on what delivers shared outcomes effectively- that may be short term, long term, or permanent. The Nature Fund has suffered from many delays and problems and if best practice is to be secured, experience needs to be drawn from the successes and failures of the wide range of current grant funding schemes such as those run by NRW and its legacy bodies, and private sector grant funds- and from the experiences of grant fund recipients as well as administrators.
- Identifying financial instruments needs to discuss ‘sticks’ as well as ‘carrots’, if it is to make use of all the tools at the disposal of this critical policy area. Examples would include implementing significantly more meaningful fines for contraventions, at present it is perceived to be cheaper in some cases to face prosecution than to comply with legislation on large scale developments, leading to perverse outcomes.
- Reviewing designated sites and species is an inadequate action to deliver the stated goal of improving management of our highest quality environments. The explanatory text does not recognise that many outstanding factors affecting protected sites originate in the wider countryside and cannot be resolved on a site by site basis, or therefore by

site management plans. The language of this section does not reflect the ecosystem approach, which is already implemented by protected site managers, so far as they have the power and influence to do so. This plan needs to facilitate site managers to work in partnership to change these large scale negative factors. In addition, Wales is fortunate to benefit from a wide array of important sites that do not benefit from statutory protection but which play a critical role in maintain connectivity and supporting diversity across our landscape. These Local Wildlife Sites include private land and non-designated nature reserves managed by NGOs and they deserve greater recognition for the role they play and the resources invested in maintaining them. The role of proactive species conservation and the associated public engagement also needs to be recognised.

- Improving the evidence base is an absolutely critical action and we strongly commend its inclusion. However there is a woefully poor elaboration of what this will mean. We feel the following consultation question about the evidence base (relating to the Information Hub) fails to address the most important issue relating to this topic, which is the lack of investment in relevant data. For example, actions with regard to the evidence base should address the following points:
 - SoNaRR will only be as good as the data that inform it. We do not presently know what data sources it will use and how adequate it will be for reporting progress against nature recovery, or how it will address gaps in the data available.
 - To reliably report trends and change you need long term datasets, collected in an appropriate and consistent way. The current NRW corporate plan completely disregards the need for expert data, favouring citizen science, which can only ever be one part of the solution. There is no recognition of the need to protect long term investment in maintaining highly valuable datasets able to detect change over the long term. Much biodiversity data that is currently available is not collected with constant effort and cannot be used easily to measure change over time. Many key biodiversity datasets that are able to inform the measurement of progress are dependent upon poorly funded NGOs and vulnerable to financial constraints. The current lack of priority given to supporting the evidence base is perfectly exemplified by NRW's decision to cease funding Professor Tim Birkhead's 42 year study of the guillemot population on Skomer Island. Long term, high quality studies of this kind are the best resource we have available to us to examine change and the causes of change in the wider environment, and their value is not fully understood or appropriately recognised by decision makers.
 - Data will only answer a question if the design of the data collection is appropriate to the question being asked of it. Welsh Government and NRW need to be more pro-active in supporting external programmes that will (and currently) provide the data required to monitor change in the natural environment. The experts in this field (such as universities), who provide this high-level design and analysis skill base, are inadequately supported or engaged in this process.
 - The importance of verified data is not adequately recognised, in our experience, by either Welsh Government or NRW. Verification is the

process of ensuring the accuracy of the records in a database, which depends upon the skills of the recorder. Many large datasets included on the NBN, for example, are sourced from a huge array of recorders of variable skill, are not verified, and are therefore much more likely to include errors (and are known to do so). This is even more likely when large numbers of non-expert recorders are providing a greater proportion of the dataset used (such as many citizen science projects). All datasets should include a consideration of their reliability, based on the nature of data collection, especially if they are being used to inform key decision making.

- With this in mind, securing sustainable funding for Local Records Centres (LRCs) is key to ensuring the availability of high quality data to monitor progress, as they provide the best verification process in Wales. They also support networks of local recorders, encourage greater recording and reporting, provide local expertise and training, and manage data carefully and appropriately in order that it can be used effectively. The continued success of the LRCs must be protected if we are to achieve the ambition of the Plan.
- Data have value. The system currently depends to a very great extent on volunteers, contributing and verifying records to and for LRCs, county recorders or NGO-led monitoring schemes. This needs to be recognised, not only for the very great benefits this brings and the enormous equivalent financial value of work donated, but also for the future risks in terms of maintenance of skills and financing of recording systems. Investment is required to maintain this enormous voluntary contribution to data generation in the form of training and mentoring the next generation of recorders.
- Many data are not available for use, because data protection or ownership issues (data not in public domain because they are owned by the funder of their collection e.g. developers' ecological consultancy reports).
- The Information Hub is unknown, in our experience, to the majority of conservation practitioners.
- Encouraging effective communication and engagement is a commendable action. We feel that a key component of this effort is recognising other stakeholders as equal partners, in order to engage with them effectively. Wales Biodiversity Partnership has in the past provided a good model where many sectors work together to deliver biodiversity gain and the skills, contributions and opportunities provided by each sector have been respected and encouraged. A top-down approach that has been increasingly apparent undermines the potential benefits gained from genuine co-operation.
- Providing better governance- another action we support in its inclusion. However, there remains a need to identify some of the problems that need addressing. For example, the current WBP (including LBAP) system is barely resourced at all, and relies on unfunded in kind contributions from many partners. Additional funding will definitely be required if the aspirations of this plan are to be achieved. Existing biodiversity measures have provided a number of successes including cross-sectoral work, but even good governance and partnership working carries a cost and this

needs to be recognised. Also in this section, the reference to 'identify priority species or habitat that society specifically wishes to see benefit from improvements to our ecosystems' should be changed. It is not a populist vote, species identified for targeted action should be first an issue of intrinsic value and moral responsibility, and second, a priority identified for work based on evidence gathered to identify the critical threats to those species, and mitigating actions.

- Agriculture requires a greater profile within the NRP, because of the significant impact agricultural operations have on the greater part of our countryside. Many already identified biodiversity priority actions are signposted to agri-environment schemes and much European funding is directed at agricultural activities. Detailed actions to address this are required, and consideration needs to be given to the risks that may accompany any potential exit from the European Union.
- We would reiterate that although this document is called a plan, it is in fact a strategic framework and we would expect to see a much more detailed action plan on which we would welcome the opportunity to comment.

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

We agree strongly with the ambition to, and necessity of, engaging with business more effectively to deliver nature recovery. We would recommend:

- Conditioning any business funding with biodiversity enhancements, or prioritise plans that do so, including a monitoring mechanism to ensure the work is delivered effectively.
- Increase fines for non-compliance with biodiversity protection.
- Fund compliance-monitoring more effectively through agriculture and development- ensure that mitigation and compensation is delivered and that it is effective
- Build biodiversity into all Welsh Government departments' policies
- Strengthen levers such as NERC to something defensible in court, thereby preventing bodies from brushing commitments aside. Many tools such as NERC are already available to support nature recovery but are not strong enough to make a real difference. Improving existing tools would be an 'easy hit' compared to developing new ones.

Question 7: How can we strengthen the way we work together?

- Make longer term commitments to key projects and partnerships, where the shared outcomes are recognised as key or core to the delivery of nature recovery, giving stability over time and reducing the risk of making an in kind commitment.
- Make engagement more two-way. For example, the WBP conference could be opened up to a more diverse set of contributors and be more challenging. Ecosystem groups and other fora where multiple sectors are represented improve communications, and strengthening the flow of information from Welsh Government through to e.g. Local Biodiversity Action Plans would help engage partners at both a national and local level in the delivery of any shared plans and targets. The continued support of LBAP partnerships will ensure good partnership working within regions.

Question 8: How can we share budgets and look at integrated outcomes

- Many voluntary sector partners are financially vulnerable and delivery of their outcomes and targets therefore subject to fundraising. A longer term commitment to financially supporting shared outcomes would secure their delivery.

Question 9: What else should be done to avoid duplication and to deliver our roles

- Duplication may be perceived where it does not in fact exist. For example, NRW legacy bodies CCW and EAW both had biodiversity officers, which may appear to be a duplication of effort, but they did markedly different jobs. Several NGOs work on Marsh Fritillary conservation, but delivering different outcomes and/or in different places, the outcome of their work being more than the sum of the parts. Care should be taken to identify whether and where duplication is a genuine issue.
- Overall duplication can be avoided by closer partnership working and reporting, so that all partners are more aware of what others are delivering and/or are working towards shared goals, so that projects are not duplicated. WBP ecosystem groups and LBAPs support this function.
- An increasing emphasis on competition in allocating government funding can be counter-productive with regard to reducing duplication, because the competition for funds results in organisations being less open about the applications they intend to make. This duplicates effort in the application process, results in overlapping applications, and puts the onus on the funder to identify and prevent duplication in funding awards and wasting applicants' time and resources.

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

- Too few organisations and individuals are aware of or engage with the Hub for it to be effective at present
- The critical role of Local Records Centres needs to be identified
- Ease of access to data and confidence in their reliability are critical issues

Question 11: How best should we communicate progress with delivery of our ambition, for example, a 3 or 5 year work programme or an annual delivery plan?

Critically, we believe work programming is a separate issue to communicating progress. Reporting action can be annual, but reporting results needs to be much longer term and on longer rotation, because outcomes will be difficult to measure, even harder to link to actions, and slower to change.

Question 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 net loss" of biodiversity is referred to, but there is no discussion about the baseline against which this will be measured, or what success will look like on the ground. This becomes a problem, for

example, when discussing rare species (e.g. on page 8). Are they rare because they naturally occur at a low density, or are linked to scarce habitat (e.g. limestone grassland), or are they rare because we have destroyed the populations and their natural habitats in a way which could and should be reversed for many reasons (such as marsh fritillary butterflies)? Just because they are restricted to protected sites now does not mean they should stay that way.

- Agriculture is barely mentioned except indirectly via the RDP. Page 8 seems to imply the productive countryside can't be expected to be biodiverse. This needs to be changed. There is also a great need to use careful language in this regard- this sentence states that 'the wider countryside in contrast is under pressure to deliver particular services as efficiently as possible'. We should not be describing this process as efficient, if it is not sustainable; this is misleading. What is meant is that is managed in an extractive a way as technology allows, and this should be tackled so that all areas provide multiple outcomes- not excused as inevitable.
- The plan needs to deal with how we recognise and investigate ecosystem functions and processes that we do not currently understand. Quantifying, economically valuing and manipulating natural processes as a method to reverse biodiversity decline is predicated on us fully understanding how the systems work. We don't. There needs, therefore, to be a precautionary element to natural resource management.
- Local authorities and other public bodies need to be more accountable for biodiversity loss so that they invest more in preventing it- employing more staff with ecological skills and investing more in enforcement and monitoring of mitigation and compensation.
- The existing Environment Strategy, and its successes, have not been referenced or included for consideration.

The current and future role of the Wildlife Trust of South and West Wales (WTSWW) in delivering Nature Recovery in Wales

WTSWW already invests heavily in nature recovery in Wales, as a local charity based wholly within the country, working across 40% of south and west Wales. Much of the work we already do contributes to the ambition of the Nature Recovery Plan and through our charitable status we already secure significant funds towards this purpose: whilst we do receive Welsh Government funding, much is also raised from membership, tourism activity (for example Skomer and Skokholm islands), wider UK-based charitable Trusts and funders, and from business activities. We therefore also bring significant additional funding into Wales and into nature recovery.

Within our staff and significant volunteer support base we also have the skills to take forward many of the goals and actions of the NRP. These shared aspirations place us well to contribute to future delivery of the plan. We also have a proven track record of contributing and openly sharing our data and

the results of our work via BARS, partnership working with NRW and engagement in WBP and other cross-sector partnerships.

The following case studies provide just a few examples of areas in which WTSWW can make a valuable contribution to the Nature Recovery Plan. This is not an exhaustive list of potential opportunities and we would welcome any opportunities for discuss additional areas where WTSWW could contribute.

Case study 01: the management of our highest quality environments

WTSWW manages over 80 nature reserves in south and west Wales totaling around 1800 hectares, including 41 SSSIs, 10 National Nature Reserves, 20 sites with European protection (Special Areas of Conservation/Special Protection Areas).

We therefore invest a significant proportion of our own resources in maintaining and enhancing the biodiversity interest of these important sites. The benefits to Wales of our excellent track record in managing these nature reserves include:

- Helping Welsh Government meet its Environment Strategy, European and other biodiversity targets and commitments across a very large number of designated sites
- Maintaining scarce species and habitats and providing the biodiversity hotspots that help maintain and restore diversity in the wider countryside
- Providing public access to almost all of these sites, increasing public engagement and supporting health and wellbeing
- Working with volunteers in site management, upskilling and supporting social networks for vulnerable individuals and communities
- Providing models of sustainable funding for these protected sites through tourism, sustainable local produce such as charcoal

We also have a track record of supporting important and protected sites that become vulnerable through ownership change. For example, as far back as the 1950s in west Wales we worked with the then Nature Conservancy to fundraise and jointly purchase Skomer Island (now an SSSI, NNR, SAC and SPA) for the nation. We secured the funds to purchase part of the Rhos Pil Bach & Pennar Fawr SSSI (referred to in our ownership as 'Rhos Marion nature reserve), in Ceredigion, after it was put up for sale following its designation as SSSI, in 2011. In 2013, following the liquidation of The Grasslands Trust, Carmel NNR in Carmarthenshire was purchased by NRW and WTSWW then took the land on under lease and now works to fund and deliver its continued sympathetic management.

We have a robust network of local staff and volunteers across south west Wales who are highly skilled in managing our best natural environments for

nature recovery and we welcome the opportunity to apply these skills to the delivery of the Nature Recovery Plan.

Case study 02: providing high quality data and evidence

All biodiversity data collected by WTSWW is entered freely into the public domain by reporting on BARS and to the LRCs where it is available to inform nature recovery decision making. We also support the LRC network and two of our staff are Board members of the LRCs in our area of operations, contributing our resources to help support the development and maintenance of high quality data. Many of our members and supporters are key providers of biodiversity data, submitting records, taking part in monitoring programmes (for example on our nature reserves), acting as county recorders, or through WTSWW's own citizens science recording schemes.

We have strong working partnerships with a number of universities and have shared and financially supported postgraduate students to undertake original research into the Welsh environment.

We contribute our experience to publications such as Natur Cymru to help share best practice to other organisations and individuals engaged in nature recovery in Wales.

We support and host globally important research programmes, such as on our Pembrokeshire islands of Skomer and Skokholm.

We believe that the ready availability of high quality data to anyone involved in policy development or decision making is critical to ensuring effective action is taken. We support this through our own work and would welcome opportunities to deliver more in this area, through the existing skills of our staff and volunteers and through our large public interface and the opportunities that affords.

Case study 03: engaging the public in taking action to protect our environment

Over the past 18 months, WTSWW has employed a Water for Wildlife Officer through funding provided by Welsh Water, who has been working with communities in Swansea to raise awareness of pollution on waterways, and help local people mitigate their impact on the aquatic environment.

Swansea is highlighted in the Water Framework Directive as having some of the poorest rivers, estuaries and seas in Wales, both in terms of water and ecological quality. The reason for this includes the prevalence of Urban Diffuse Pollution (UDP), which is a form of pollution that originates, often unknowingly, in and around people's homes and businesses, which is caused by many commonplace mistakes in household activities that people undertake everyday. This includes; disposing of detergents, paints or oils down external drains, incorrectly connecting new appliances to the drainage system and overusing fresh water from taps and toilets.

In the past, the issue of UDP has been tackled by organisations like Welsh Water by building infrastructure such as treatment plants to help mitigate the harm caused to the local environment. This approach is not only expensive, but does not tackle the root cause of the problem, which is inappropriate use of drainage systems by householders. WTSWW, in partnership with Swansea Environmental Forum and NRW, set out to tackle this problem via a new method using the Clear Streams campaign, which sought to directly engage people with their local water environment, and use nature as a catalyst for behavioural change in local communities.

Many people, especially those living in urban environments, have extremely limited contact with nature, and often aren't aware of the wildlife that lives in and relies on their local environment, and the harm that pollution may cause to them. It is evident that encouraging change in community attitude towards the water environment is difficult if people do not see a reason to protect it, and WTSWW has been tackling this problem by taking communities out to their local waterways, often in partnership with local community groups, and showing them the wildlife that relies upon it. This has taken place in the form of activities such as community otter surveys on rivers, bat detecting on canals and lakes and salmon migration mornings at weirs and other obstructions on the river Tawe.

By taking people out into their surrounding environment and showing them the wildlife that relies on clean water, it has allowed us to engage in an ongoing dialogue with many different facets of the local community; from students and academics at Swansea University, to individuals involved in back to work and support groups in Communities First Areas.

We have also been able to engage with people directly in their homes, by offering free water storage devices such as water butts and garden ponds free for those in the Swansea area, which not only delivers a measurable reduction in storm water entering the sewers, but also allows us to communicate to people the importance of reducing the amount of water entering local sewers.

This activity allowed us to secure a small grant from the Welsh Government Tidy Towns scheme to set up a new volunteer community action group called the Tawe River Rangers, which has seen local Swansea people undergo training in aquatic wildlife identification and pollution identification and reporting, and subsequently adopt stretches of the Tawe to survey once every 2-3 weeks and report back their findings to ourselves, and report pollution incidents to NRW.

The Clear Streams/ Water for Wildlife project illustrates WTSWW's commitment to community education for the improvement and protection of the natural environment. With further support and resources, we would welcome the opportunity to build upon the work undertaken this year, and expand our reach to communities beyond Swansea.

Case study 04: delivering nature recovery in the wider countryside

Beyond designated sites such as SSSIs and SACs, the wider countryside contains a network of high quality habitats which are in their own right rich and diverse, but which also provide vital corridors and dispersal routes without which our designated sites would be far less resilient. The majority of these sites are privately owned and are extremely vulnerable to mismanagement and development.

In 2013/14 WTSWW developed a Local Wildlife Sites partnership, comprising 12 Local Authorities, two Wildlife Trusts, and a variety of NGOs who are working together to improve management of private land across South East Wales.

With help from a Resilient Ecosystems Grant, in 2014 over 80 high quality private sites were visited, assessed and their owners' given management advice, six degraded sites received habitat restoration work, and countless other landowners were reached via events and publicity.

By employing staff to promote and facilitate better management of private land, WTSWW has been able to address habitat loss and connectivity at a landscape scale, beyond the boundaries of designated sites. Further funding is desperately needed in order to continue this vital work, to educate landowners, and to protect and restore the multitude of important sites identified across the region.

Case study 05: delivering environmental benefits through species conservation

During 2014 WTSWW has been able to employ a Water Vole Officer, with financial support from the Resilient Ecosystems Fund. Water voles are Wales' fastest declining mammal, now lost from large swathes of Wales as a result of habitat loss and fragmentation, and predation by the non-native American mink. Water voles are an iconic but under-recorded species, and our work has focussed primarily on rural areas of Ceredigion where the species still has a stronghold, surviving primarily on private farmland. By working closely with farmers and gaining access for survey we have identified many new sites where this mammal is present. We have been able to draw up an inventory of sites and potential management that could be undertaken to enhance water vole habitat where they occur; we will now fundraise to deliver this work. This not only helps us target a species on the brink and help it recover, but the actions identified in almost all cases (such as fencing ditches and streams) will provide restored habitat which benefits many species, and improved water quality (by excluding livestock and allowing vegetation to recover). We have also found that as a non-statutory body some landowners are more willing to engage with us.

This project is one of many undertaken by WTSWW that demonstrates our ability to work positively with farm businesses, to provide targeted recovery

measures for threatened species but deliver additional outcomes for the wider environment at the same time.

With additional resource we would welcome the opportunity to develop our work in the farmed landscape further.

Case study 06: working with the business sector to deliver nature recovery through public engagement

WTSWW has a track record of working directly with the business sector and delivering both biodiversity and societal gain by this means.

Our partnership work with Dow Corning provides an excellent example of this. Our long term work with the company sees WTSWW managing their Cadoxton Ponds nature reserve at their site in Barry for the benefit of wildlife, making the most of our staff and volunteers skills and experience in this area to drive nature recovery on their property. Dow Corning also fund an education officer through WTSWW who delivers a diverse range of natural environment education programmes through their education centre at Cadoxton Ponds, working with a wide range of local schools. This strong partnership benefits both WTSWW and Dow Corning and delivers a range of benefits through the educational engagement.



RESPONSE BY COED CADW (THE WOODLAND TRUST) TO THE CONSULTATION ON THE NATURE RECOVERY PLAN FOR WALES SEPTEMBER 2014

December 2014

Introduction – Who we are

1. Coed Cadw (The Woodland Trust) welcomes the opportunity to respond to this consultation. The comments that follow are delivered on behalf of Wales' leading woodland conservation charity. We achieve our purposes through a combination of acquiring woodland and sites for planting and through wider advocacy of the importance of protecting ancient woodland and trees, enhancing its biodiversity, expanding woodland cover and increasing public enjoyment.
2. Across the UK we own and manage over 1,000 sites covering approximately 20,000 hectares (50,000 acres). In Wales we have over 120 sites, with a total area of 2,400 hectares (5,900 acres). These include 34 sites of Special Scientific Interest. We have 300,000 members and supporters across the UK. Coed Cadw has three key aims: i) to enable the creation of more native woods and places rich in trees; ii) to protect native woods, trees and their wildlife for the future and; iii) to inspire everyone to enjoy and value woods and trees.
3. In this response, due to time constraints we have declined to address each consultation question separately, but, instead we highlight below what we think are the important issues.

Ambition

4. We support the ambition of the Welsh Government in introducing an integrated approach to natural resource management in Wales; an approach that recognises and manages the 'essential services' and wider benefits that nature provides for people. We acknowledge that there are massive environmental changes and disruption underway and we welcome the attempt to try a new and more integrated approach.
5. Our concern is the absence in this consultation of any detailed strategy to deliver all the aspirations this document sets out. We might welcome these aspirations, but without any route map there is a credibility issue which constrains our willingness to endorse the proposals. We find this comparable with other examples of difficulties in translation from policy to delivery within Welsh Government, for example in relation to the environmental aspirations of Glastir.
6. Our ambition, which we invite the Welsh Government to share, is of a Wales rich in native woods and trees, enjoyed and valued by everyone. This means wooded landscapes, rich in nature's diversity and complexity, more able to bounce back from the worst that climate change, pest and diseases, and other pressures can throw at them. It also means places which are beautiful, inspiring, accessible, productive and relevant to everyone; healthier places in which to live and work providing space to relax, reflect and recharge away from the increasingly fast paced lives we now lead. And it means protecting the many characteristic and special species associated with woodland, some of which may hold the key to important scientific and medical advances.

7. For nature recovery we believe we need to adapt and diversify our habitats for resilience and robustness in the face of climate change and other pressures. This requires maintaining and restoring a diverse range of habitats and ecosystems to a healthy functioning state; enhancing critically scarce habitats that are characteristic and sustainable and developing habitat in highly modified ecosystems in farm, forest and urban environments that enhance our lives and build up wildlife in a sustainable way.
8. We invite the Welsh Government to show clear leadership and commitment to delivering nature recovery and tracking progress towards measurable outcomes. We would like to see the Government demonstrate a renewed commitment to the Nagoya Protocol and its Convention on Biological Diversity, and commitments made within Biodiversity 2020, by making a binding promise to restore all degraded ecosystems. For woodland this means reversing the biodiversity losses in all ancient woodland previously converted to low diversity plantations. Such woods can also contribute to more sustainable long term timber production and the Welsh Government should lead in demonstrating this on the public forest estate, and ensure that support for this transformation is also available through Glastir to private woodland owners.

Principles

9. We think it is vital that the Nature Recovery Plan acknowledges that there are two fundamentally different reasons to conserve biodiversity and that both are important: Our biodiversity should be protected and restored:-
 - a. for its own sake ie for its intrinsic value, and
 - b. Because it is essential to the wellbeing and financial viability of our society.

We do not support a Plan that over-focuses on this second reason alone.
10. People matter and the willing engagement of both the general public and landowners is crucial to finding solutions. We suggest that landscape needs to be recognized as a socio-ecological system of which humans are a part. Since all of the landscape is affected by varying degrees of human agency to think of the landscape as being constituted of 'natural' or 'man-made' may over-constrain activities which could increase permeability and complexity.
11. We believe that nature recovery requires a combined approach of the following strategies. These are mutually interdependent and supportive, and the Nature Recovery Plan needs to effectively balance investment across the full breadth of these actions.
 - a. Protecting the irreplaceable. The surviving patches of habitat are of utmost importance. Clearly these represent rich reservoirs for many species and, in the case of ancient woodland and other ancient habitats, may represent the only available habitat space.
 - b. Restoring that which is damaged and degraded. Protecting, restoring and where necessary actively managing these areas of habitat is also of great consequence.
 - c. Retaining wildlife in the matrix between protected areas. To achieve recovery and resilience our thinking is that it is in the matrix between protected areas where most conservation effort needs to happen. Whilst protecting and restoring 'habitat' is critical it will come to no end if everywhere else (i.e. most of the landscape) becomes sterile, increasing the pressure on that which is left and further undermining processes which support resilience and adaptation. The current concern about pollinators clearly illustrates this. For example, in our own work, our approach to the farmed countryside is not driven by the need to create large blocks of woodland, but to identify a range of ways in which the permeability and complexity of the landscape can be enhanced. Hence our emphasis on the importance of small scale planting and trees outside of woods

- d. Creating and adding new habitat. New woods that can buffer extend and link our fragmented habitats to build more resilient landscapes.
12. The Nature Recovery Plan needs to set out a definition of success, incorporating an understanding that our landscape is not natural but a reflection of land use and change is constant. Biodiversity requires constant reappraisal and reconfiguration.

Actions

13. We seek reassurance that Nature Recovery Plan will generate a rolling programme of actions the Woodland Trust believes the following are essential areas for action, and are our success criteria by which we will judge the Plan:

The Nature Recovery Plan should:-

- a. Describe mechanisms to ensure that all government policy and legislation is proofed for consistency with the Government's biodiversity aspirations and that the value of nature is fully reflected in decision making. A recent example of practice in one area undermining biodiversity conservation is the current re-interpretation of CAP regulations on eligibility of land for basic payments. How will the Welsh Government counter the incentive to remove trees and other habitats that this new interpretation will create?
- b. Demonstrate commitment to biodiversity management on all Government owned land, in particular the public forest estate. This must include a commitment for all planted ancient woodland to be in a process of restoration.
- c. Identify and support actions across all 4 strategies described in paragraph 11 above. Priorities for woodland conservation include:
 - i. the protection of ancient woodland and ancient trees;
 - ii. the restoration of ancient woodland sites converted to coniferous plantations;
 - iii. management of woods to provide for the full range of woodland species,
 - iv. increasing tree and hedge cover in the general landscape and in urban areas;
 - v. Significantly increasing over-all tree cover, along the lines recommended by the Land Use and Climate Change Group.
- d. Acknowledge that some habitats are irreplaceable and cannot be recreated, and therefore should be protected and restored in their surviving entirety. Such habitats include all ancient woodlands including those converted to coniferous plantations, and ancient trees. Considerations of non-creatability also apply to other habitats such as peatlands.
- e. State that biodiversity offsetting cannot be applied to such irreplaceable habitats
- f. Incorporate a climate change adaptation and resilience plan to identify and respond to the long term consequences for biodiversity of climate change and other non-reversible environmental changes, e.g. nitrogen deposition.
- g. Adopt the recommendations for new woodland creation presented by the Land Use and Climate Change Group. A step change is required to maximise the important role that woods and trees play in tackling the impacts of our changing environment, from negating the impact of flooding, to improving our air and water quality, and providing sustainable low carbon building materials and fuel.
- h. Steer the environmental aspirations of Glastir delivering biodiversity across the wider landscape of farming and forestry (ie most of it). The aim should be to establish biodiversity that emerges in a sustainable way from modern farming and forestry systems.
- i. Guide how biodiversity is provided for in the matrix between protected areas, not only in how farming is practiced, but also how and where development is undertaken, how roads are planned, the way rivers are managed and green space is nurtured in urban areas.

Working Together

As part of the final Nature Recovery Plan for Wales the Welsh Government must develop a convincing strategies for embedding shared responsibilities across government and for funding sustained contributions from r all stakeholders who deliver biodiversity conservation.

14. There should be renewed commitment to support effective leadership for nature recovery through the Wales Biodiversity Partnership (WBP), ensuring shared responsibility across Government, enabling all sectors to contribute and empowering partnerships to deliver for biodiversity. The recent Nature Fund process for example triggered many interesting ideas and proposals but then failed to provide a framework to develop and engage with most of the participants.
15. WBP has an important communication role, presenting successes, ensuring engagement with the public and informing business, land owners and the wider community of the importance of, and need for, biodiversity recovery.
16. Wales Environment Link (WEL) is crucial to partnership work across environmental NGOs and between NGOs and Government. The Plan should confirm enhanced support for the work of WEL and their role in information exchange and working groups on policy detail and implementation.
17. The Plan requires buy-in from across Government, especially in relation to farming and land use policy; economic development and transport. All policy and legislative proposals should have to undergo a mandatory assessment of their impact on biodiversity along with the existing appraisals of economic and social impact.
18. There is a need for less fragmented and longer term funding provision including an investment in expertise in matching government and non-government funding. We recommend that NRW establish an external funding team able to assess and co-ordinate approaches to European funding and other major external sources.
19. The Woodland Trust has considerable experience of working with business and bringing in funding from commercial sources including woodland carbon funding. We would be happy to share our experience with Ministers. We recommend caution on expectations of payments for ecosystem services and warn that transaction costs could considerably constrain the potential for such mechanisms. Their remains a crucial role for Government funding derived from taxation.

Consultation Response Form

Your name: **Tom Hunt**
Organisation (if applicable): **Association of Local
Environmental Records Centres CIC (ALERC)**
email / telephone number: tom.hunt@alerc.org.uk
07972131035
Your address: **C/O RECORD,
Cedar House,
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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 proposals you have outlined are not ambitious enough and do not seem to appreciate the fact that the environment has intrinsic value and should be allowed to exist for its own sake as much as for the economic benefit of people. This does not mean that biodiversity does not have economic value, and it does not mean that we shouldn't recognise this value, but it *does* mean we should recognise its intrinsic value as well, and try and protect it even where it is not possible to calculate a clear economic case for doing so.

With this concept in mind, the ambition of the Nature Recovery Plan should be revised. It is not clear what is meant by "reverse the decline in biodiversity", and how this matches with the specific goal "of no net loss". To reverse the decline would be to increase biodiversity, and not simply halt the loss. Accepting the intrinsic value of biodiversity would mean that a clearly stated ambition of increasing the biodiversity in Wales would be more appropriate; perhaps something along the lines of "increase the range and abundance of native habitats and species in Wales" would be better.

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

In a sense the ambition statement may be sufficient to "address underlying resilience" depending on what this means. If the aim is simply to freeze Welsh biodiversity in time as it were, then a "no net loss" approach may work. However, it would be much better if the NRP could adopt a much more ambitious "net gain" approach. This would be consistent with the other stated goals of restoring habitats at landscape scale, addressing negative loss factors, improving connectivity and improving management, all of which are sound principles.

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

No they are not, as suggested by the previous answers. Specifically, the goal of "no net loss" is not commensurate with the ambition of "reversing the decline", assuming that reversing the decline actually means increasing biodiversity. Central to the issue here is the fact that Wales has already lost much of its native biodiversity, both in terms of the number of different habitats and species and in terms of the abundance of those habitats and species. This is a serious problem as it means that the datum by which biodiversity loss, gain and stability is measured is actually much lower than it could and should be. This concept is often referred to as shifting baseline syndrome¹. Take the wall brown butterfly *Lasiommata megera* for example. This is listed on Section 42 of the Natural Environment and Rural Communities Act (2006) and is a species of conservation concern across the whole UK. Viewing records via the [National Biodiversity Network Gateway](#), it can be shown that the wall brown was recorded very frequently across the whole of Wales until sometime in the 1990s when records of it started to decline. The spread of records between 2000 and 2014 is a fraction of what it was in the

¹ Originally by Daniel Pauly (1995) in reference to fish stocks. More information can be found in an article by [Frans Vera \(2010\)](#)

period up to 1990. Therefore, any policy that aims purely at achieving no net loss of biodiversity would restrict the wall brown to its current very limited range. This is species, like many others could and should have a very wide range across Wales (as well the rest of the UK). The NRP should have a goal of “net gain”, encouraging species like the wall to grow their range, and encouraging other extinct species, native to Wales, to come back.

To achieve this, an additional goal should be considered that aims to build up the full picture of the wildlife of Wales. This should not be difficult to do, but there is existing evidence that is hard to share because it has not yet been digitised (usually existing as written records on recording cards). The wording for such a goal could be along the lines of “ensure future management decisions are based on the best possible evidence”. The actions needed to achieve this goal would be digitise existing data, support wildlife recording groups and individuals and support organisations aimed at collecting, digitising and sharing wildlife information, particularly Local Environmental Records Centres.

4. Are the actions proposed right and adequate?

Generally, these actions seem to be appropriate for the goals and general aims of the NRP. It is good to see recognition that the evidence needs to be improved, as this is crucial for ensuring that the best possible decisions are made. It is important to realise that good, evidence based decision making benefits not just wildlife, but sustainable development as well. It was remarked at a recent all party parliamentary group meeting that a lack of available expertise and evidence to local planning authorities actually works against the building and development sector because it reduces certainty and lengthens the time required to make planning decisions.

With this in mind, the NRP should include a robust action surrounding evidence in order to ensure that policy makers, planners, public and private organisations have access to accurate, detailed and trusted biodiversity evidence. This is outlined below.

5. What additional action would you wish to see?

A robust monitoring strategy for species and habitats. How this is executed is up to the Welsh Assembly Government, but it should utilise the existing network of volunteer recorders, local environmental records centres, recording schemes, societies and wildlife enthusiasts. This is a proven way of ensuring rigor in evidence collection and sharing in a cost effective way.

A monitoring strategy should not stop simply at the collection of records however. Interpretation is just as important. For example, modelling exercises can be used to map the likely distribution now, and in the future, of various species and habitats. There are examples of where this has taken place successfully already, such as north Wales².

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

There is undoubtedly a willingness within businesses to at least appear greener as this can help market their products. Crucial to ensuring that businesses not only appear green, but also contribute to the delivery of biodiversity related ambitions, is ensuring they are using the best possible evidence to make their decisions. ALERC members can help realise this by providing biodiversity records to people working in the construction sector. However, we estimate that in 2012-13 only 5.6%³ of planning applications used biodiversity data to help them mitigate impacts on wildlife. It would be very desirable to raise this percentage by engaging with private companies and local planning authorities to make sure they are aware of the data provided by Local Environmental Records Centres and also to enforce the duty to consider biodiversity that local authorities are already bound to. It is essential that any provisions, whether already existing or set by a new NRP are enforced by the relevant organisation (usually NRW).

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

² [Arnell, A.P. & Wilkinson, J.W. \(2013\) Spatial Conservation Status Modelling of the Great Crested Newt in Anglesey and North-East Wales. CCW Contract Science Report 1044.](#)

³ Based on data from wales.gov.uk and the Association of Local Environmental Records Centres.

In England, Local Nature Partnerships have been set up along county lines, to assist stakeholders as a group in making the best decisions for nature for a given locality. It is important that something similar exists in Wales to fulfil this function and to replace the now fragmented and largely disregarded Local Biodiversity Action Plan system. LNPs enable the public, private and NGO sectors to come together and work in a coordinated way to benefit biodiversity.

LNPs in England currently, and LBAPs historically have traditionally been organised on a county by county or local authority by local authority basis. In Wales this could be organised on a regional basis. The Local Environmental Records Centres in Wales are already set up to cover four different regions (north Wales, west Wales, south east Wales and Powys) and in order to achieve biodiversity protection and regeneration at a landscape scale, it would be advisable to set up regional forums based on these boundaries.

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

Good partnership working ensures shared budgets and integrated outcomes. The current model for Local Environmental Records Centres is to work on a partnership basis by garnering support from a range of stakeholders, including local authorities, private companies and NGOs. LERCs in Wales are able to utilise this support, together with volunteer input to provide a value for money biodiversity information service. The volunteer input ensures that for every £1 spent by the LERC, and extra 56p is gained through coordinating volunteers⁴.

This picture can be improved by ensuring that local authorities, key biodiversity actors and stakeholders are encouraged as much as possible to support their LERC. In order to continue to provide, and to improve, the robust and value for money evidence base that currently exists, all biodiversity stakeholders should offer some form of support the LERC in their area. Failure to do this results in patchy evidence, where species and habitat records can only be shared for certain areas. This problem can be particularly acute for habitat data. For example, in 2012-13 north Wales had habitat data available for 100% of the total area, whereas for south east Wales it was only 2%.

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

This is a key issue, especially when considering how organisations bid for funds in order to complete their projects. There are many small NGOs working to protect and enhance biodiversity in Wales and many of them are bidding to similar funders for similar projects. At worst this can mean that duplication of effort, “reinventing the wheel” and wasting of money. In order to prevent these problems, greater dialogue needs to take place between funders, policy makers and actors. This should include:

- Very clear published goals and objectives, so that everybody is aware of what good projects should try and achieve.
- Meetings between policy makers and funding bodies (from both the governmental and charitable sectors) so that it is clear to funders what the policy objectives are and so that they can make sure the objective of their funds are commensurate with these.
- Meetings between funders and those looking to bid for funds so that bids can be tailored and well written and so that time is not wasted writing and reading in appropriate bids.
- Support to those looking to make to funding bids to ensure they are submitting the best possible bids. For example, this could take the form of advice on which funders to apply to, or which policy areas are currently in most need of action. This kind of support is most critical for the small NGOs, most of whom do not have the overall resources to employ a full time funding officer to research and write bids.

Specific examples that show the need for this support can be made available on request.

⁴ Based on statistics for 2012-13 from the Association of Local Environmental Records Centres.

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

Information is key to making and executing good policy. Investment in information is worthwhile as it helps to ensure that money spent on actions is appropriate, efficiently used and not wasted. Therefore, encouraging the use of the information hub would seem wise. However, somewhat ironically, it seems as though details on what is proposed for the information hub are actually hard to come by. For example, there are only a couple of sentences that mention it in this consultation document, and further details on it are hard to find using internet search engines. Therefore, details of the proposed development of the information hub should be published as soon as possible and people should be allowed to comment on them.

There are many factors which will affect the development and use of an effective information hub, such as the way information is presented, who it is pitched at, how copyright issues are dealt with and so on. These are too numerous and complex to detail here. However, Welsh Assembly Government should be aware that all activity incurs a cost, and information gathering and dissemination is no different. The most pressing concern would be how this cost is covered and how the information hub is to be funded. This will have further implications regarding what information can be shared on it and who it can be shared with. Consultation on these issues should be sought from ALERC and the National Biodiversity Network Trust (amongst others).

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?

It is not clear why a multi-year programme and annual delivery plan are mutually exclusive. It should be possible to do both. Working to a five year work programme has the benefit of removing uncertainty and setting relatively long term goals, something which is particularly important when considering that reversing biodiversity decline is a long term ambition. Within a five year programme, annual milestones can be included and reported on. The advantage of this is that it allows regular comment and scrutiny of the policy, which hopefully makes it more robust and encourages “buy in” from the widest possible range of stakeholders.

Therefore, the answer to this question is to try and do both; a long term work programme, but with shorter term milestones which can be scrutinised and criticised regularly.

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.

Yes. Overall the document seems to lack “teeth”, that is to say its overall ambition is OK, but not really ambitious enough. It mentions the ecosystem services that biodiversity can offer the people of Wales, but fails to set out an ambitious vision for Wales, where species and habitats are valued simply for their own sake and because they provide enjoyment and inspiration to people, rather than valued only because they reduce flood impacts or sequester carbon emissions (although this is also important).

On top of a greater overall ambition, it is important to know how the people of Wales can track progress on biodiversity targets and hold organisations to account when they are not fulfilling their obligations. For example, the document cites the NERC Act (2006) and mentions the important duty it places on public bodies to have regard for biodiversity. However, no mention is made of how people can assess whether public bodies are conforming to this obligation. In the case of planning and development control, how would anyone know whether a local planning authority was using the best possible biodiversity evidence base, and ensuring the correct surveys are carried out to inform building plans and mitigate environmental harm?

For the NRP to have a full and proper impact it needs to be more ambitious in its targets for biodiversity and very clear about how its effects are measured.

**Carmarthen Bay and Estuaries
European Marine Site
Relevant Authorities Group**



**Grŵp Awdurdodau Perthnasol
Safle Morol Ewropeaidd
Bae ac Aberoedd Caerfyrddin**

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By e-mail to: biodiversity@wales.gsi.gov.uk

28 November 2014

Dear Biodiversity and Nature Conservation Branch,

Consultation on the Nature Recovery Plan for Wales

Thank you for the opportunity to comment on this consultation on the Nature Recovery Plan for Wales.

The Carmarthen Bay and Estuaries European Marine Site (CB&E EMS) Relevant Authorities Group (RAG) purpose is to develop and implement a management scheme so as to secure compliance with the requirements of the European Union Habitats Directive and delivery of the conservation objectives for the Site.

The RAG's vision for the EMS is a quality marine environment, where the habitats and species of the site are in a condition as good as or better than when the EMS was selected, where human activities co-exist in harmony with the EMS habitats and species and where use of the marine environment within the EMS is undertaken sustainably.

Whilst we welcome the Nature Recovery Plan's core vision and purpose, we are concerned these will not be realised without clear, committed action to deliver them and without robustly tackling the root causes of environmental degradation and biodiversity decline, including conflicting socio-economic objectives and contrary visions and management.

Carmarthenshire County Council
City and County of Swansea
Countryside Council for Wales
Environment Agency Wales
Pembrokeshire County Council
Pembrokeshire Coast National Park Authority
Trinity House Lighthouse Service
Saundersfoot Harbour Commissioners
Welsh Water

Cyngor Sir Caerfyrddin
Dinas a Sir Abertawe
Cyngor Cefn Gwlad Cymru
Asiantaeth yr Amgylchedd Cymru
Cyngor Sir Penfro
Awdurdod Parc Cenedlaethol Arfordir Penfro
Gwasanaethau Goleudy Trinity House
Comisiynydd Harbwr Saundersfoot
Dwr Cymru

The RAG welcomes the NRP's acknowledgement and acceptance:

- of the ethical argument for conservation of species, habitats and ecosystems as well as the utilitarian necessity of protecting ecosystem services;
- of the unfortunate reality that habitats and species are in decline and under pressure and that the environment is consequently less resilient and able to adapt to change;
- of the need to both build the resilience of our environment, while continuing to protect priority sites and species;
- of the need to reverse the decline in biodiversity and ensure lasting benefits to society by building the resilience of our ecosystems;
- that maintaining and enhancing biological diversity, ecosystem extent and connectivity and sustainable management of our natural resources are fundamental goals;
- of the goals associated with refreshing the Wales Biodiversity Partnership;
- of the essential role that biodiversity plays in the functioning and resilience of ecosystems;
- of the necessity for the condition and connectivity of protected areas and species to be addressed within wide frameworks so that they best contribute the overall resilience of our environment.

The RAG further specifically welcomes:

- the explicit inclusion of the marine environment in its scope, and the acknowledgment of the richness of marine life and seabed habitats around Wales;
- the explicit acknowledgement of the need to contribute to an ecologically coherent network of marine protected areas (MPAs), ensuring that these areas are well managed, and the goal of achieving Good Environmental Status to meet the requirements of the Marine Strategy Framework Directive.

In specific response to question 1 the RAG agrees with the generality of the ambition insofar as it goes, however we urge that the shortcomings identified below are addressed.

The RAG has a number of concerns, including:

- that the goals of 'no net loss' of biodiversity and the specific focus only on management of our highest quality environments are under-ambitious in a nature recovery plan and risk failing to deliver the reversal in biodiversity decline identified as the vision;
- the understanding of the meaning of "Natural Resource Management" and its application; specifically, we are concerned by the risk of it being usurped to favour economic development at the expense of restoring the health of the natural environment and biodiversity;
- whether the objective of improving the "evidence base" actually means increasing our knowledge base or simply increasing the evidence required to support current government policies;

- the risk of the objective to increase the resilience of ecosystems to better enable them to adapt to whatever disturbance is applied to them being interpreted as creating “headroom” to increase pressure on those ecosystems.

Despite welcoming the undertakings to develop a National Marine Plan (NMP), our response to the recent consultation on the vision and scope of that plan found it to be unambitious, to have little acknowledgement of the importance of a healthy, biodiverse and well-functioning marine ecosystem, to fail to acknowledge that Wales’ marine environment has been overexploited and degraded for many years, to fail to include aspiration to enable it to recover, and to fail to identify the need for biodiversity and natural environmental protection and conservation to be addressed as overarching considerations. We also expressed concern that the NMP vision appeared to align poorly with the overarching UK High Level Objectives.

We note reference to the Wales Marine and Fisheries Strategic Action Plan (WMFSAP) and, whilst acknowledging that this plan is subject to review and revision, we are conscious that it is substantially directed towards development of fisheries rather than protection of nature; *i.e.*, there is a high risk of their objectives conflicting.

Consequently, we are concerned that over-focus on the NMP and the WMFSAP in the context of nature recovery will be insufficient and we urge that the fullest attention be directed to the effective management of both existing designated MPAs and prioritising action to safeguard vulnerable marine habitats and species.

We therefore welcome the statement that “designated sites are the jewels in the crown of our natural environment” and that Welsh Government will set clear objectives for the *Natura 2000* network in its Natural Resource Policy. We further welcome the goal of the Marine Transition Programme to ensure that all MPAs are well managed. However, we note that the intention for securing effective MPA management is not only to safeguard marine biodiversity and the wider ecosystem but also socio-economic benefits. In this context, we further note Welsh Government’s intention to, if necessary, revise the legislative framework “to remove conflicting objectives and increase integration”. Whilst we acknowledge that a secondary purpose of the Habitats Directive is to support sustainable development, we urge that the key nature conservation purpose of this Directive not be compromised.

The RAG notes the acknowledgement of the CBD and EC policy contexts, and specifically the EUBS vision that biodiversity and the ecosystem services it provides are protected, valued and appropriately restored for biodiversity's intrinsic value as well as its contribution to human wellbeing.

We also unreservedly welcome the overarching goal of sustainability, though are concerned that the concept is poorly understood and misused. We urge WG to make clear that sustainable development refers in the first instance to environmental sustainability and that economic sustainability will follow from this.

We welcome the currently ongoing work of the Marine Programme to improve management of MPAs, of which European Marine Sites are the most significant for Wales, however we have concerns about its direction of travel and its ability to deliver the necessary improvements.

Whilst we welcome the new Common Fisheries Policy initiatives to eliminate discarding, we remind Welsh Government that this change will benefit targeted species and their associated trophic webs rather than marine habitats and the remaining majority of marine species; *i.e.*, it will not directly benefit the greater part of marine nature interest.

We urge that schemes to offset impacts be considered carefully and that, where introduced, they are able and highly probable to ensure habitat or species compensation or mitigation will deliver at least like-for-like environmental quality with that which is lost.

We welcome the undertakings to improve the “evidence” base through research monitoring and surveillance. However, setting aside the misuse of the term “evidence” (that which is presented in support of an assertion; that which tends to prove or disprove something; that which serves to either support or counter a theory or hypothesis) we urge that the focus is on the knowledge base required to make the most informed decisions rather than restricted to collection of information to support specific agendas. We are also acutely aware that the resources currently available for marine monitoring are far from sufficient; the allocation of adequate resources will be essential to meet this aspiration.

We welcome the commitments to communication and partnership working. We ask that you note this RAG and the other EMS RAGs around Wales have worked as partnerships for 15 years and that communication between the partners and with stakeholders has been important part of this work. We therefore look forward to being provided the opportunity to contribute our experience and knowledge to support improvement of marine nature protection governance.

As a general point, we are concerned that, in discussing environmental and natural resource management, neither this document nor Welsh Government in general, acknowledges that it is far beyond mankind’s capability to proactively manage most natural environmental systems to achieve a desired goal (this is particularly so in the marine environment). It is misleading to the public to imply it. Rather, Welsh Government needs to make clear that our shared objectives should be management of human activities and use of the environment and its natural resources, so as to least disrupt them and to best allow them to recover.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Trevor Theobald', written in a cursive style.

pp

Trevor Theobald

Chair, Carmarthen Bay and Estuaries EMS RAG

[REDACTED]
[REDACTED]
[REDACTED]

Biodiversity and Nature Conservation Branch
Rhodfa Padarn
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By e-mail: biodiversity@wales.gsi.gov.uk

1 December 2014

Dear Sir / Madam,

Consultation on the Nature Recovery Plan for Wales

Wales' wildlife and natural habitats are depleted and degraded. There is, without doubt, a deep and urgent need for meaningful action to arrest their decline and enable them to recover. Whilst I welcome the Nature Recovery Plan's core vision and purpose, these will not be achieved without clearly acknowledging and vigorously tackling the fundamental causes of environmental degradation and biodiversity decline, not least conflicting socio-economic objectives and business-as-usual growth objectives.

I am encouraged to read Welsh Government's clear acknowledgement and acceptance of:

- the validity of the ethical case for conservation of species, habitats and ecosystems in addition to the utilitarian case for protecting ecosystem services, that maintaining and enhancing biological diversity, ecosystem extent and connectivity, and sustainable management of natural resources are of themselves fundamental and legitimate goals;
- the essential role that biodiversity plays in the functioning and resilience of ecosystems;
- the reality that wildlife and its habitats are in decline and under pressure and that the environment is consequently less resilient and able to adapt to change;
- the essential need to reverse the decline in biodiversity while continuing to protect priority sites and species, and thereby improve ecosystem and environmental resilience and their benefits to society;
- the objectives associated with the reinvigorated Wales Biodiversity Partnership;
- the necessity for the condition and connectivity of protected areas and species to be considered within wide frameworks so that they best contribute the overall resilience of our environment.

Having spent my career working to foster marine environmental conservation, I particularly welcome the explicit inclusion of the marine environment in the draft plan; the explicit acknowledgment of the richness of marine life and seabed habitats around Wales; the explicit acknowledgement of the need to contribute to an ecologically coherent network of marine

protected areas, ensuring that these areas are well managed; and the goal of achieving Good Environmental Status under the Marine Strategy Framework Directive.

The general, overarching vision and aspiration are commendable - as far as they go. There is, however, a perceptible change throughout the consultation document's narrative that undermines the vision. Specifically:

- the goal of 'no net loss' of biodiversity and the specific focus only on management of highest quality environments are insufficiently ambitious, particularly in a nature recovery plan, and risk failing to deliver the vision of a reversal in biodiversity decline;
- the meaning of "Natural Resource Management", despite its now widespread and popular usage, is ambiguous and its misuse or misunderstanding creates the risk of it being appropriated to favour the exploitation of nature at the expense of restoring the health of the natural environment and biodiversity;
- there is great risk that the objective to increase the resilience of ecosystems to better enable them to adapt to whatever disturbance is applied to them may be interpreted as creating "headroom" to increase pressure on those ecosystems.

The multiple references to the parallel marine initiatives anticipated to contribute to nature recovery may appear encouraging to the readership unfamiliar with them. However, these in turn suffer from fundamental weaknesses in their ability to deliver the vision of nature recovery.

The vision and scope for the National Marine Plan (NMP) is unambitious; it poorly acknowledges the importance of a biodiverse and well-functioning marine ecosystem; it fails to acknowledge that Wales' marine environment has long been overexploited and degraded; it fails to include any ambition to enable recovery or for biodiversity and natural environmental protection and recovery to be tackled as overarching priorities; and it aligns poorly with the overarching UK High Level Objectives.

The Wales Marine and Fisheries Strategic Action Plan (WMFSAP) is predominantly targeted on the development of marine fisheries rather than protection of nature; its objectives are thus more likely to conflict with the vision for nature recovery than to support it.

Both these two marine plans, therefore, have little capacity to make significant positive contributions to nature recovery. Consequently, the Nature Recovery Plan needs to give comprehensive attention to effective management of existing designated marine protected areas (MPAs) and prioritising action to safeguard vulnerable marine habitats and species.

To this end, the statement that "designated sites are the jewels in the crown of our natural environment" and that Welsh Government will set clear objectives for the *Natura 2000* network in its Natural Resource Policy is therefore somewhat reassuring, as is the clearly stated goal of the Marine Transition Programme to ensure that all MPAs are well managed.

Nevertheless, the emphasis on socio-economic benefits in the objectives for ensuring effective MPA management are of great concern. In particular, I am disturbed that the stated intention to, if necessary, revise the legislative framework "to remove conflicting objectives and increase integration" is simply doublespeak to prioritise business-as-usual where conflicts with nature conservation arise. Although a subsidiary purpose of the Habitats Directive is to support sustainable development, the primary nature conservation purpose of this Directive must not be undermined.

Whilst the Marine Programme has indeed begun work to improve management of MPAs, of which European Marine Sites are the most significant as they encompass all SACs, SPAs and

most SSSI with marine features, its ability to deliver necessary management improvement and needed outcomes for marine nature conservation are, at the most generous, far from certain.

Whilst the proposed revised Common Fisheries Policy initiatives to eliminate discarding are extremely positive, any changes that accrue will benefit targeted species and their associated trophic webs but not marine habitats and the remaining majority of marine species that comprise the greatest part of marine nature interest.

The commitment to improving the “evidence” base *via* research, monitoring and surveillance would be more welcome if focus were explicitly on the knowledge base required to make the most informed decisions rather than potentially limited to the restricted meaning of the term “evidence” (that which is presented in support of an assertion; that which tends to prove or disprove something; that which serves to either support or counter a theory or hypothesis). However, to deliver on this commitment, Welsh Government will need to substantially increase resources for marine monitoring since those currently available are far from adequate.

The language in this document serves to perpetuate the widespread and hubristic misconception that mankind has the capability to proactively manage natural environmental systems to achieve desired goals. In general, and certainly in the marine environment, society does not have such capability. Instead, our objectives need to be management of human activities and use of the environment and its natural resources, so as to least disrupt them and to best allow them to recover. Further, WG need to acknowledge and make clear that the achievement of sustainable development necessitates environmental sustainability in the first instance and that economic sustainability will follow from this.

Yours sincerely,

A handwritten signature in black ink, reading "Rose Zullino". The signature is written in a cursive style with a large, stylized 'R' and 'Z'.

Nature Recovery Plan Consultation

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?

We welcome the Welsh Government's ambition to become more proactive towards nature recovery (page 5), which will enable Government to take a whole system approach to conservation, instead of the reactive, piecemeal approach which has ultimately allowed biodiversity to decline.

We are pleased that there is reference made to the UK National Ecosystem Assessment findings (page 4). The UK NEA highlights that underlying economic and social drivers are causing biodiversity loss and that ecosystem degradation is not being tackled, leading to continued loss of habitats and species. We notice that there is an overview of the State of Nature report in the Appendix to this consultation, and it would be useful to have some of the key points from this report included in the body of the consultation to give a clear picture and better background to the rate at which species and habitats are in decline.

We welcome the recognition that there is less richness and abundance of nature in the marine environment (Page 4). We would further welcome recognition of the importance of the marine environment in Wales, as highlighted in the UK NEA which notes that 'seven out every eight hectares of Wales Natura 2000 sites are in the marine environment, reflecting the high conservation importance of marine habitats in Wales'.

We welcome recognition that Welsh Government plan commit to embed the ecosystem approach across Government and to and promote the value of this approach to the Welsh public and to businesses (Page 4). It would be useful if the consultation highlighted how Government are promoting these values to the public and businesses or, furthermore, had this as an action for the Nature Recovery Plan.

We would like to highlight our concerns over the wording used to describe the role of the MTP:

"The Marine Transition Programme (MTP) will ensure coordinated policy development and delivery to achieve resilient marine ecosystems and protect our most valuable environmental assets to encourage sustainable jobs and growth in a way that is consistent with our national and international commitments" (page 5).

We welcome recognition of the role that the MTP will play in achieving resilient ecosystems and protect valuable environmental assets, but the purpose of delivering this should not be simply 'to encourage sustainable jobs and growth'. **Our international obligations state that there is a need to protect biodiversity in its own right.**

Additionally, we have some concerns in how effective certain aspects of the MTP will be in delivering resilient marine ecosystems. We have discussed these concerns in detail in the following questions.

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

We welcome the ambition statement on Page 6, however this statement should recognise the **intrinsic** and **non-use value** of biodiversity as an equally important reason to reverse its decline. Furthermore, the ambition statement reads like the only reason to reverse the decline in biodiversity

is to bring about benefits to humans. **Recognising the intrinsic and non-use value of biodiversity would better reflect the ambitions of the Convention on Biological Diversity (CBD).**

We welcome the ambition to develop Natural Resource Management as this will help to move away from simply feature based conservation measures which has been the status quo to date. **However, Natural Resource Management alone will not achieve ecosystem resilience and recovery unless the full suite of conservation measures are implemented including site and species specific conservation.**

We welcome the acknowledgment of the Welsh marine environment under the 'Reversing the decline in biodiversity' section (Page 6) given that marine has been recognised as under-resourced and under-prioritised by National Assembly for Wales Environmental Sustainable Committee in their Enquiry into Marine Policy in 2012. However, **we feel that the current actions proposed for marine may not go far enough** to protect and recover biodiversity for the following reasons:

Under 'building resilience', we are pleased to see recognition of the need for Wales to complete their contribution to an ecologically coherent network of Marine Protected Areas and ensure that these are well managed, and that it is recognised that this network will play a critical role in improving the status of the wider marine environment and support sustainable use of Welsh seas. Whilst we also agree that this will build resilience of marine habitats and species, we are currently concerned that research suggests up to 50% of the current MPA network is in unfavourable conservation status. Therefore, we would expect the Nature Recovery Plan to demonstrate some **real actions** with dedicated **resource identified** and **set targets for recovery** to reduce this decline (such as robust assessments for damaging activities within protected sites and greater resource allocated to monitoring). Furthermore, it is yet to be determined whether the network in Wales is ecologically coherent and therefore an action of Nature Recovery Plan should be to **complete the network of sites** in the marine environment as soon as possible.

Under 'effective resource management', we are pleased to see that both the Welsh National Marine Plan (WNMP) and the EU Marine Strategy Framework Directive have been highlighted as frameworks to support national resource management. However, we are concerned that, having now seen the draft Vision and Objectives of the WNMP, **marine planning may not ensure development in the marine environment occurs sustainably.** The draft objectives currently highlight that "jobs and growth are the overriding priority" for Wales. Should this statement remain, the Plan once adopted is unlikely balance the three pillars of sustainable development (economy, society and environment) in the decision making process and therefore cannot ensure that natural resources are sustainably managed. It should be mentioned within this consultation that marine planning (as a requirement of the EU Marine Strategy Framework Directive) should adopt an **ecosystem based approach** to marine management. An ecosystem approach to planning will help to ensure that such management decisions are balanced and that the environmental capacity of the marine ecosystem is fully understood.

We are pleased to see the connection has been made between marine planning and the delivery of MSFD. Marine plans, if developed using an ecosystem based approach, should provide a framework for spatial protection measures and guide marine licensing decisions, supporting delivery of Descriptor targets for MSFD. From what we have seen, it is unclear currently to what extent the WNMP will adopt an ecosystem based approach and therefore support the delivery of Good Environmental Status (GES) by 2020.

Lastly, **additional measures will be necessary to achieve GES in Welsh waters.** Although we are aware that the proposed UK MSFD Programme of Measures will be consulted on early in 2015, we are concerned that there may be few, if any, additional measures proposed to achieve delivery of GES in UK waters. **If new measures are not adopted, Welsh Government will be less effective in achieving GES and therefore less effective at achieving effective natural resource management and nature recovery in the marine environment.**

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

We welcome the goals proposed to achieve the ambition statement.

We welcome the quantitative Aichi targets for terrestrial, inland and coastal and marine areas, however, we would argue that there should be reference made to the need to conserve 30% of marine areas through the system of protected areas. We would highlight that this should include the equivalent of terrestrial SSSIs' as recommended by United Nations (2003), which states that the number of coastal and marine protected areas should be greatly increased and that 20 to 30% of *every habitat* should be "strictly protected". Furthermore, it should also be recognised that the goal '*to improve management of our highest quality environments*' will only be achieved if these protected areas are well managed (including properly resourced for monitoring and enforcement).

We particularly welcome the goal to put in place a '*framework of governance to support delivery, working together across sectors and strengthening our collective evidence base*'. There is currently a paucity of data in the marine environment which makes strategic sustainable management of natural resources more difficult to achieve. Welsh Government, through the Effective Evidence Base project, should seek to identify what elements of the marine ecosystem are data deficient and prioritise research needs on this basis. This will ensure sustainable marine planning and achieving GES in marine waters is more achievable.

This goal should also help to ensure that there is a more integrated approach to natural resource management of the marine and terrestrial environment in Wales, which supports the principles of Integrated Coastal Zone Management. **We would like to see more joined up thinking than currently exists between the draft Planning Bill (Wales) and the development of the Welsh National Marine Plan.**

We are concerned that the '*no net loss to biodiversity*' goal could be misinterpreted to not allow for recovery of already degraded habitats and species, particularly given the lack of baseline data for marine species and habitats.

4. Are the actions proposed right and adequate?

We welcome the proposed strategic actions which will be used to deliver the NRP ambition and goals. Without knowing the detail of the National Natural Resource Policy and how this will integrate with other policies, it is difficult to note how effective the first action ('putting in place effective resource management') will be. However we note that on page 17, when discussing how NRW will publish area statements which will identify the ways in which our natural resources in each area of Wales can be managed, it states:

"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."

We are concerned that current proposals for area plans will not provide for recovery of areas or habitats that may not appear to provide high economic and social value or these areas will be at the bottom of the priority list to manage. Again, we stress that **recovery of habitats, under international obligations, should be undertaken for wider purposes than just perceived human benefit.**

We are pleased that Welsh Government recognises the need to restore marine habitats in Wales. To do this they have identified the Welsh National Marine Plan as a proposed ‘action’ to deliver nature conservation. That being the case, it is important that the Plan embeds an **ecosystem based approach** (a requirement of the EU MSFD) to ensure the environmental capacity of the marine ecosystem is fully understood and ensures development in the marine environment is environmentally sustainable (not just economically viable). It is also critical that the WNMP embeds an **ecosystem approach** if it is to support delivery of Descriptor targets under the EU MSFD. We are concerned that the current draft Vision and Objectives of the WNMP will not ensure development in the marine environment is sustainable, given that in the current draft objectives state that “*jobs and growth are the overriding priority*” for Welsh Government.

We welcome the proposed action to ‘*review designated sites and species*’ and in particular the need for the Marine Transition Programme to complete Wales’ contribution to a coherent network of MPAs and to ensure these are well-managed. **We are concerned with the current intention of Welsh Government to secure a framework for MPA management if the purpose for this is ultimately to improve the socio-economic benefits for Wales.** The principle purpose for MPA designation **and management** is to protect and recover biodiversity, and although MPAs ultimately provide a wealth of ecosystem goods and services for humans, the aim for their management should not be to enhance socio-economic benefits. It should also be recognised that **conservation and human use are not always compatible.**

We are concerned that Welsh Government plans for natural resource management with a focus on natural resource usage will unduly compromise NRW’s role in its ability to advise on nature conservation and protection. With regard to Natural Resources Wales (Page 19), we would refer you to Wales Environment Link response to the Environment Bill White paper, which MCS was signatory to, in which many of our present concerns over this consultation are duplicated. In that response WEL stated that proposals currently place ‘*too much emphasis on the use of natural resources and not enough on their enhancement, protection and responsible stewardship*’.

We welcome the action to ‘*improve the evidence base for nature*’ and in particular the production of a State of Natural Resources Report (SoNaRR) that can be used to track progress towards achieving the sustainable management of natural resources. We hope that this report will include the state of marine and coastal natural resources.

We welcome recognition of the Effective Evidence strand of the Marine Programme within this action which aims to develop appropriate research and a marine evidence base for Wales. **We have been made aware that this programme only has funding until March 2015.** In order for the evidence base for marine to improve over time and support other actions such as sustainable marine planning and delivery of the MPA network, we believe that **longer-term funding should be secured for this programme and recognised as a funding need within Nature Recovery Plan**, to ensure the evidence base continues to be used, updated, and has the ability to identify marine research needs.

5. What additional action would you wish to see?

It is currently unclear within the consultation who is going to fund and execute this plan. Further information is needed.

Furthermore, we would like to see **greater resource allocation to marine** to ensure that it is given sufficient priority; we understand that the MTP including the Effective Evidence Base project and staffing allocations are under review and would strongly advocate that the Nature Recovery Plan recognises the need **increase resources allocated to marine**.

There is no action that highlights Welsh Government's need to achieve GES in Welsh waters by 2020 within the strategic actions of the Nature Recovery Plan. This is an **essential** component of nature recovery in the marine environment and therefore there needs to be a separate goal to reflect this. Additional measures will be needed to ensure Wales achieves delivery of GES and this separate goal should reflect the need for Wales to identify and implement monitoring programmes and measures including identification of funding to achieve GES in Welsh waters by 2020.

It would be useful to have an additional action that will determine how Welsh Government will promote an **ecosystem based approach** to natural resource management across departments and to the public and businesses.

We would like to see **timescales** given to actions to which Welsh Government can be held to account.

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

We believe that this question should include stakeholders rather than just businesses.

We believe that **Welsh Government needs to promote and incentivise the ecosystem based approach** across Government Departments, businesses and stakeholders, to support socially responsible practices and ensure that understanding environmental limits and encouraging participation becomes part of the Welsh ethos.

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

Clear, transparent and increased communication from Welsh Government is critical to ensure people are aware of Government proposals and can provide their views.

Recognising that NGOs and Welsh Government have the same overarching goals, **Welsh Government need to do more to facilitate dialogue between government and the NGO sector/stakeholders**.

As a charity, we provide valuable evidence and advice to Welsh Government. We would suggest that, given that most stakeholders give their time freely, expert opinion provided is given recognition and **feedback** on how this has shaped policy decisions.

We welcome the acknowledgment of the work of Wales Biodiversity Partnership (p22-3) and would caution against the review process undermining the excellent work undertaken by the Biodiversity Action Plans (national and local) and the NERC section 42 species work, both of which are vital in providing management and monitoring essential for ecosystem functioning and ensuring we meet our international biodiversity targets.

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

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

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

In order to disseminate information we would **strongly recommend** that Welsh Government continue to commit to previous levels of funding for Wales Environment Link and Wales Biodiversity Partnership.

We recommend that Welsh Government instigate a standard format for data collection and collation across Welsh Government and Natural Resource Wales.

As per the WEL evidence to the Environment and Sustainability Committee, we would suggest that due to the high financial costs associated with marine data acquisition, Welsh Government provide a clause when granting licenses which enables them to be made privy to data from baseline surveys (for example Environmental Impact Assessments and post-construction monitoring), giving due regard to data confidentiality.

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 would like to see **annual summary review cycles**, which demonstrate progress against Welsh Government goals, actions, national and international commitments. For instance, how the Plan has supported obligations under the Marine and Coastal Access Act, the EU MSFD, etc.

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.

We welcome recognition that the implementation of the EU MSFD, EU Wild Birds and Habitats Directives, and Marine and Coastal Access Act (England and Wales) are considered as being critical to achieving the ambition of the Nature Recovery Plan.

We are concerned that currently, in terms of developing Welsh Policy, **the draft Well-being of Future Generations Bill does not go far enough to ensure sustainable development is achieved.** The environment goal needs to go further to ensure Wales recognises and stays within its environmental limits.

Overall we feel that this consultation reads like a discussion document and is **lacking in detail** as to how it will achieve its strategic goals and actions. We would welcome further detail on this and on how this plan will deliver against national and international Welsh Government commitments.



RESPONSE TO THE CONSULTATION ON THE NATURE RECOVERY PLAN FOR WALES.

1. The Alliance for National Parks Cymru¹ welcomes the opportunity to comment on this draft plan. Our interest in the plan is derived from the role that Wales' protected landscapes already play in the delivery of biodiversity targets and could play in the delivery of the plan. It also stems from the fact that 'nature' is one of the key components of 'landscape and seascape' and provides the basis for many of the special qualities for which the protected landscapes of Wales have been designated and that the public value so much in these areas.
2. Whilst we recognise the importance of halting the decline in biodiversity and of reversing the current downward trends in its condition, we are disappointed that:
 - a. the plan is not explicit about the causes of the decline in Wales' biodiversity and where the threats to it lie in the future - as a result the task ahead is not clear
 - b. the necessary components of "an action orientated recovery plan" seem to be missing, most notably what is to be done to address the threats, where it is to be done, how and by whom. It needs a clear roadmap on how the agreed international biodiversity targets are to be met nationally and locally. The plan needs clear and achievable targets, delivery timetable, resources and an indication of who is to take the lead
 - c. the status of the plan in relation to other plans and strategies is not made clear particularly the National Natural Resource Plan and the Marine Plan for Wales – will it simply inform them or dictate to them?
 - d. notwithstanding the welcome mention of the importance of integrated natural resource management, it is not made clear how this plan will fit in with the proposed area resource plan approach nor with the management of key marine resources adjacent to land
 - e. the approach in the plan uses a plethora of terms – nature, biodiversity, ecosystems, natural resource management – which serves to confuse the reader as to what is meant

¹ The Alliance for National Parks Cymru has recently been established to defend and promote the interest of Protected Landscapes in Wales. The founder members of the Alliance are the three National Park Societies, the Campaign for the Protection of Rural Wales and the National Association for Areas of Outstanding Natural Beauty. Other organisations with an interest in the future of our Protected Landscapes are also involved in the Alliance.

3. As we make clear above we welcome the 'Ambition' to reverse the decline in biodiversity and to ensure lasting benefits to society as set out on page 6. However, the ambition statement is made unnecessarily complicated by introducing the means by which the decline is to be reversed – the building of resilience of our ecosystems and by focussing on effective natural resource management. It could usefully be simplified by focussing solely on reversing the decline in biodiversity. The means can then be dealt with separately.
4. The references to the interpretation of the term sustainable development in Wales are likewise somewhat confusing. At the bottom of page 12 and the top of page 13 a definition is set out. The final bullet mentions the need to respect environmental limits. We agree that this is very important. However, we are concerned that this principle now stands in isolation as it is not reflected in the drafting of the "Well-being of Future Generations" Bill currently before the National Assembly. The absence of any mention on 'environmental limits' in the Bill has come under heavy criticism, not least from the National Assembly's Environment and Sustainability Committee in its recent report on the Bill. For this plan to succeed the Alliance considers it essential for the concept of 'environmental limits' to be at the heart of the plan and expressed in a manner which establishes exactly what this concept means.
5. The Alliance recognises that integrated management will be an important means of achieving the recovery of Wales' biodiversity. However, it is very concerned that there is no mention of the role of protected landscapes [AONBs and National Parks] in delivering biodiversity, especially as they contain a greater than average proportion of the nationally important nature conservation sites [SACs, SPAs, NNRs, SSSIs etc]. With their management plans covering 25% of Wales and the expertise they have acquired through active involvement in the conservation and enhancement of biodiversity in their respective areas, they already play an important role in delivering such an integrated approach and they could continue to do so in the future – a role that they could also play in the wider countryside around them. Further, the close relationship of 5 of the protected landscapes [Anglesey, Gower and Llŷn AONBs and the Pembrokeshire Coast and Snowdonia National Parks] to the marine environment [they all have marine SACs immediately adjacent to them] points to a role that they could play in securing the integrated management of land and sea.
6. The current review of the purposes and governance of the protected landscapes in Wales provides a golden opportunity to make their role even clearer in helping to achieve the recovery of biodiversity through an integrated approach to the management of the natural resources of these areas – an approach that is recognised internationally – and to managing the land and sea. If, as many have suggested to the Review Panel, the management plan for each protected landscape [extended out to sea where appropriate] were to serve as the local natural resource plan for the area a sound basis for nature recovery would be created and could be effectively implemented.

Contact point for the Alliance:

Edward Holdaway of the Friends of Pembrokeshire Coast National Park

edward.holdaway@btinternet.com

NATURE RECOVERY PLAN FOR WALES CONSULTATION

Neath Port Talbot County Borough Council

Consultation Question Responses

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 concentrates too much on conservation for what we can get out of systems and not for the intrinsic value of nature. It gives the impression that the systems are purely a resource for our use. We would suggest that the ambition be more in line with the NERC duty and Convention on Biological Diversity (CBD) 2020 targets; it should include reversing declines and enhancing biodiversity.

We have concerns about the language used. There have been problems with the general public understanding of the term 'biodiversity'. 'Ecosystems resilience' and 'natural resource management' are unlikely to be widely understood. No definition is presented for natural resource management. The biodiversity definition varies throughout the document. Ecosystems is a scientific ecological term that is difficult to understand, define and explain in real terms on the ground even for an experienced ecologist, it is unlikely that the public and other professional sectors will understand such terms. If such language is to be used then clear, understandable and consistently applied definitions need to be provided.

It is considered key to understand the audience for the plan. Do the wider public need to understand the technical ecological terms? Does the plan need to include technical terms and the science; or would it be better to keep such information for separate background papers? A better understanding and awareness of the audience is important otherwise these plans are not going to reach the wider community, as apparently intended.

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

The statement is too resource focused. A commitment to conserve biodiversity and ecosystems for their own intrinsic value should be added.

The statement is generally theoretical, it just describes the ecological principles; which have been presented previously in Sustaining a Living Wales consultation. Examples of practical application to demonstrate how these can be applied in real terms would be helpful.

The language again needs to be defined. References to functional units, ecosystems, and ecosystem extent must be explained. Further explanation and definition is needed to expand upon these principles.

The delivery mechanism for large scale projects needs to be considered by the plan. At a large scale there will be multiple landowners, land-uses and administrative boundaries. What organisation will be identified to take the lead and have the ability to influence this effectively? Landscape scale projects have been delivered by the voluntary sector, but these are ad hoc and dependent upon external funding. For the delivery of such an approach to become the norm there needs to be a mechanism to ensure delivery that brings together all of the different control, regulatory regimes, landowners and interested parties. This has implications for both land use planning in the development sense, and in relation to farming practices and schemes. This would require wide scale

change through numerous sectors and whilst this plan touches upon cross sector integration it does not suggest how such changes would come about.

The plan should include a statement supporting and strengthening designated sites. These sites are the core reserves and strongholds of biodiversity upon which the habitat networks and ecosystems within the wider environment, proposed within the plan, are reliant upon. These areas are the only sites that are afforded legal protection from inappropriate use, damage or destruction and without such protection mechanisms for key sites in Wales we would be in danger of losing both the biodiversity interest of the sites themselves and our back up reserves from which biodiversity can expand and recover. However, it should be noted that SSSIs only include representative examples of our important biodiversity resources; they therefore do not protect all of the equally important habitats, species and ecosystems. Further sites will need protection to prevent further declines in Welsh biodiversity and to support and recover the biodiversity resource of the wider environment.

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

Goal -Restore degraded habitats at scale – This goal needs to be followed up with quantifiable targets. The inconsistency in language should be addressed. Page ii says “restore” and page 14 says “improve”, these are very different.

Reference to the evidence supporting the statement that we have a large extent of degraded or less diverse habitat, should be included. Also, clarification on what is meant by less diverse; as some important habitats are naturally not as diverse as others but that does not mean they are less important; how is this measured? We would suggest that it would be more appropriate to consider the condition of habitat rather than their diversity. Further information should also be provided as to whether we know where these degraded habitats are and if not how this will be achieved. It will be difficult to target restoration appropriately if we don't know where such habitats are located. There is concern about the level of control available to deliver such restoration works, as these habitats are likely to be under any number of ownerships.

We have large extents of habitat in good condition which we can aim to connect; especially in areas such as the South Wales Valleys. It should be recognised that Local Biodiversity Action Plans (LBAPs) and Local Authorities (LA's) in particular are already undertaking projects to improve habitats through practical on-the ground works to sites, working with landowners, through planning mitigation/enhancement/compensation requirements, and through the provision of Local Sites – Local Nature Reserves (LNRs) and Sites of Importance for Nature Conservation (SINCs)/Wildlife Sites.

The text behind the goal talks about implementing Aichi targets regarding ecosystems but the goal is only about habitats. At scale should be at all scales allowing small but vital habitats to be valued as much as larger areas.

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

Goal - Address key negative factors of biodiversity loss and increase connectivity significantly – We would recommend that this goal is split into two. *Alternative: One goal to address the key causes of biodiversity loss and the other to maintain and significantly increase ecological connectivity.* Again we would recommend that this is followed up by quantifiable targets. It is of concern that the statement only refers to integrating biodiversity into decisions and increasing awareness of it; it is not clear how these proposals can achieve or facilitate the achievement of the goal. *The plan should identify the “key negative factors” and these should then be the focus of more specific goals.*

In relation to connectivity it is recommended that existing connectivity should be recognised and strongly protected, in addition to increasing connectivity where it is lacking.

The narrative to this goal is disjointed and implies that the key negative factors are eutrophication, other pollutant emissions and invasive species; it is of concern that there is no mention of losses to development, farming practices, marine navigation and forestry. Whilst it is agreed that the named issues do contribute towards biodiversity loss it is the activities that cause these issues that are the root causes and should be tackled.

LA ecologists play a vital role in ensuring that development throughout Wales avoids adverse impacts and losses to biodiversity as much as is possible. This role is supported to a small extent by NRW for specific issues but only the LA ecologist consider the full range of biodiversity issues and deliver in relation to the S42 list. Whilst the nature of planning decisions requires a weighing up of all the benefits and impacts from a development, without LA ecologists to advise this decision and negotiate for benefits to biodiversity, biodiversity losses would be even more widespread. Support for LA ecologists is essential, as they are the last line of defence for the biodiversity resource of Wales.

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

Goal – Improve management of our highest quality environments – There is no definition of the highest quality environments. It is assumed that this refers to designated sites, although this is not clear. If it does relate to designated sites, it is of concern that the goal relates to requirements already set out in existing legislation and targets under previous plans that should already have been delivered upon. It is suggested that the existing legislation is fully enforced.

The commentary discusses connecting high quality areas to improve ecological and wider environmental resilience; this is not reflected in the goal itself.

Alternative: To maintain and increase connectivity and improve the management of our designated sites

Whilst it is agreed that connecting designated sites would be beneficial to biodiversity it is not clear whether this is achievable. Connecting sites will require control over many land-uses and landowners. Is this realistic? Further incentives will be needed especially for landowner and farmers, for example if a farmer already has a SSSI on their land that is non-productive agriculturally- wise why would they want to give-up further land to aid connectivity?

p.15 mentions priority areas, these should be defined. Are they NRW priority areas or designated sites such as Natura 2000, SSSIs etc?

Goal – Achieve ‘no net loss’ of biodiversity – We would suggest that this goal is not achievable. This was widely missed in 2010 and it is unclear how this plan can realistically achieve this. The narrative talks about integrating biodiversity into decision-making, this is largely already a requirement of the NERC Duty, however, with no enforced by WG there has been little incentive to embed this into current decision making within the public sector. This will need to be addressed by the plan.

The commentary also talks about increasing societal awareness. This has been something that many people have tried hard to achieve over a number of years and many people in society are aware of nature/biodiversity, appreciate it 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.

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 and the constraints imposed when biodiversity is considered at a late stage in a project do little to encourage other sectors to incorporate it. Biodiversity is still seen as a hindrance rather than an asset. On 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 needs to come from top down, from WG.

Action needs to be targeted at the causes of biodiversity loss to halt and reverse such loss. It is unclear at this stage whether it is fully understood what the causes are and who is responsible, to enable the required focus of action to deliver a change. Are certain sectors responsible for significant proportions of the loss and if so how do we tackle those sectors? More focus is therefore needed.

We would suggest that *biodiversity* is too broad a term, it is all encompassing. A more focussed approach would be more beneficial, easier to measure and more likely to enable action to be achieved. Identification of what is important in the right places would aid this focus. How we measure loss should also be addressed by the plan. Do we currently consistently record loss to measure any improvement against? Monitoring systems should be put in place, resourced and required to be delivered.

This goal should be brought in line with the current EU consultation on the EU no net loss initiative which includes references to ecosystem services and actions to deliver this.

It is of concern that delivery of this goal is largely considered to be through cross-sector integration and awareness raising. These have not been fully successful in the past, therefore a different approach is considered to be needed. Separate goals relating to development and delivery of a clear, enforceable/incentivised approach to cross-sector policy integration and awareness raising are recommended. In addition, another goal should be considered, which would be to develop an approach to fully engage with the land management sector, particularly developers, to embed no net loss of biodiversity into that sector.

Goals relating to species are also missing. There may well be species that have specific requirements not addressed by habitat improvements, so may require more specific proposals.

It should be recognised that LBAP and LA's are already significantly contributing towards this goal. LA ecologists already work towards 'no net loss' as part of their advice for planning applications however it is not always the case that the final decision are able to deliver this due to the weight expected to be given to economic development. It is however 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 working to deliver biodiversity gains. In addition, LBAPs and LAs are also delivering on enhancement and improvement projects throughout Wales that are realising a gain in biodiversity. LBAPs and LAs also 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 etc.

Goal – To put in place a framework of governance to support delivery, working together across sectors and strengthening our collective evidence base – We would add to this goal: *embed biodiversity into all the decisions and actions of all public bodies.*

The biodiversity sector, especially in relation to public and voluntary bodies, is poorly resourced in comparison to other sectors. LA's in particular have very few ecological staff and have seen an unprecedented reduction in specialist staff in recent years. The voluntary sector is largely dependent upon external funding. 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, as proposed by the plan, will not be achievable without support and resources from WG. We would therefore also recommend the addition of a goal to *appropriately resource the biodiversity sector, both in respect of monetary and staff resources.*

LBAPs and LAs have a wealth of locally collected data that would be able to contribute towards the evidence base.

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 actually deliver anything that could result in any nature recovery or deliver any of the items previously listed in relation to improving degraded habitats and addressing the causes of loss, or to increase connectivity. All that is listed is:

- Research so we understand ecosystems better
- Monitor biodiversity
- Identify species and habitats and maintain them
- Integrate and engage with other sectors

We would consider this list incomplete. Focus for action should also include practical on the ground delivery, specific measures to ensure resources are available to deliver.

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.* It is strongly recommended that the selection of priority species and habitats should be science based rather than chosen by society. Extra species that have merit in relation to awareness raising and encouraging societal action could also be selected for promotional purposes.

We would recommend that further detail and clarification is provided for the actions, as those currently listed are vague and it is difficult to understand 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 we are unable to comment in detail about this action.

In relation to the Environment Bill, NRW will be required to publish area statements, which identify the ways in which our natural resources in each area of Wales **can** be managed. We would recommend that such non-committal language should be avoided wherever possible to avoid any misinterpretation of intention. Similarly, it states that the Environment Bill and the Well-being of Future Generations (Wales) Bill can help public bodies to seek opportunities. This seems again a little weak if the expectation is for public bodies to deliver based on such language. With the increasing cuts in budgets throughout the public sector only necessary requirements are likely to be delivered upon, any ambiguity in language should therefore be avoided.

In relation to the NRW area statements, clarification should be provided as to how these area statements will fit with existing land-use policy, such as LDPs?

The narrative states that the “Welsh Government and NRW will wherever practically possible endeavour to demonstrate best practice in implementing effective natural resource management on their own estates.” This is again ambiguous and non-committal, the WG and NRW should set the example and work in line with these documents and policies. This lack of firm commitment just continues to demonstrate that biodiversity conservation is a nice to do activity, when we can rather than an essential requirement. If WG are not to commit to delivery then why would any other organisation or sector? WG must lead by example.

Action – Delivering a Welsh National Marine Plan – No comments

Action – Facilitating Cross-sector policy integration – the narrative states that it is important to strengthen the implementation of the biodiversity duty. We agree that it must be strengthened but a commitment to implement and enforce is just as, if not more, important. The duty has been in place since 2006 but has not been widely implemented and no enforcement action in Wales has been taken, which again demonstrates a lack of commitment. The plan suggests that the duty ‘could be’ strengthened by links with the Environment Bill or Future Generations Bill, but it is not clear what this would entail plus the language is, again, non-committal, we would like to see a commitment that these pieces of legislation will strengthen the duty.

The last part of the text refers to improving management of public sector land for nature. However, it is not clear whether this is a realistic expectation. If this is to relate to Local Authorities, resources will need to be targeted for this. Recent budget cuts mean that this is unrealistic at the current time. In addition, we would welcome the intention to engage with government depts. but would note that engagement does not necessarily mean that a change or an action will be delivered. If there is no requirement for that government dept. to deliver anything then it is unlikely that any change or action will result. We would suggest that this action should be more ambitious and require other sectors to actually deliver in relation to biodiversity conservation. The current expectation is for the biodiversity sector to engage and encourage other sectors, this has been happening for many years, especially within local authorities, but clearly does not deliver the necessary outcome. A different approach is needed to ensure that other sectors seek out help from the biodiversity sector due to the need to deliver rather than the biodiversity sector push their way in to where they are not welcome.

Action – Funding our partners – Funding streams need to be fit for purpose, reversing biodiversity decline cannot happen quickly and works can only be undertaken within certain seasons. It is clear that funding needs to be for several years to ensure that all seasons are used to best advantage when undertaking habitat specific work. There are many pots of money for biodiversity work, they should be brought together, lessening administrative burden not only on the funders but also the applicants who are often put off from applying due to the time consuming paper work. The sector, generally, is grossly under resourced; therefore the amount of time available to fill in application forms to secure funding can eat into the time needed to actually deliver action. Funding is often obtained by bodies that have the staff resources to apply, this potentially means that conservation works are therefore continually delivered in the same places to the detriment of other areas. Similarly, match-funding is also difficult to find where there are already limited resources. Confirmation of funding is often provided so late in the season that projects are adversely impacted and less likely to be able to be delivered, timely confirmation will also be essential to enable efficient delivery of funded projects.

We are concerned that there are a number of funding streams not included under this action; Glastir and Local Authority Partnership Funding. All of these funding streams are key to the delivery of biodiversity conservation work on the ground. It is also not clear what 'nature organisations' in the first paragraph encompass, are Local Authorities included?

Specifically in relation to the RDP we would recommend that the areas covered by such funding are expanded to cover all areas needed to deliver the scale of conservation works required under this plan; or else additional funding will need to be identified for landowner/farmers. In addition, clarification should be provided in relation to what 'nature outcomes' are defined as.

Funding needs to be targeted at agreed priorities.

Specifically funding needs to be released to fund project development, especially if large scale projects are to become the norm.

Action – Identifying financial instruments – the narrative describes biodiversity offsetting. This is a new and very difficult scheme to administer. Strong leadership is needed from WG to LPAs to ensure that this is a secure and fair way of securing long term protection for habitats, species and ecosystems. Offsetting needs to be delivered on a local basis to ensure that the local biodiversity resource is not adversely impacted and that local communities continue to be able to benefit from their local biodiversity. These schemes need to be carefully developed, and we have concerns about this being included in the plan until a scheme has been fully developed.

Clarification should be provided as to what is meant by 'green growth'.

Action – Review designated sites and species – We would suggest that this action be altered to: *Support designated sites and species*. We consider these site and species as very important. Designated sites provide a vital role as core reserves of biodiversity that support the wider environment. 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. We would also suggest that management plans for designated sites be developed to include and integrate ecosystems resilience and consider their functioning within such ecosystems. In addition, existing legislation must be implemented and sites protected and appropriately managed. We would suggest that further designated sites are identified that protect the key strongholds for biodiversity upon which the wider environment is reliant upon, at the moment SSSIs are only representative examples rather than a systems of sites protecting all areas of importance. Further sites are therefore suggested to be needing protection to prevent further declines in our biodiversity in Wales and to support the and recover the biodiversity resource of the wider environment.

Action – Monitoring and reviewing regulatory instruments – We suggest that there must be ways to amend regulatory instruments when needed. There have been many loopholes found in the various pieces of environmental legislation we currently adhere to. We do not expect any single piece of legislation to cover everything but if issues occur there must be some way of dealing with them.

The first paragraph states that the Environment Bill will provide NRW with opportunities to take a more integrated approach. We would suggest that a firmer commitment is needed, the Environment Bill needs to set out how NRW will take an integrated approach.

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

Action – Improving the Evidence base – there are no targets or quantifiable goals currently 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, although it is again just mentioned as an item that could be looked at rather than any definitive commitment. However, if this monitoring is to take place this will need additional resources. The narrative fails to mention the already excellent set of Local Records Centres that cover the whole of Wales. They hold a vast amount of data which can be mobilised at any time to support research and monitoring. However, they are currently independently funded. It would be prudent of WG to incorporate the LRCs into their function or that of NRW to help fulfil this action.

The final paragraph mentions making better use of information gathered through monitoring undertaken for the planning system. Clarification is needed. What information? What monitoring? Use of information provided as part of planning submissions has issues in relation to copyright and intellectual property rights; whilst planning monitoring undertaken by LA's in relation to habitat loss is not consistently undertaken and is time-consuming so would need further resources to provide a robust data set. We would have concern that it is considered likely that a reasonable dataset may be available on a local level to negate the need for small developments to look at providing information pertaining to their sites. Such a data set is not currently available and resources are currently non-existent at a local level for this to become a reality. This 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 – this is already being done at ground level by LBAPS and LAs and it is disappointing that WG have not acknowledged that in this document. With fewer resources to Local Authorities it is certain that effective communication at a local level will suffer. The constant loss of Biodiversity Officers and Ecologists from LAs means only the bare minimum statutory work is being done and the very well established LBAP networks are starting to be adversely affected and there is a danger that LA will be unable to fully support these networks over the coming years; meaning that some will cease meeting or undertaking works entirely.

We would recommend that the first paragraph be altered to focus on getting people to understand rather than just be enthused; particular focus should be placed on getting people to understand what they can do to help. We should be aware of the audience and ensure we target messages and languages appropriately.

Clarification should be provided as to what the information hub is. LA's are not aware of or feeding in to the information hub so there is a great deal of information missing from it at present.

Clarification should be provided in relation to the final sentence concerning the State of Natural Resources Report informing public debate on the Future Generation Report that will inform public sector priorities; it is not clear what this actually means and what the outcomes will be. Surely biodiversity conservation is already a priority for the public sector, hence this plan? Further explanation is needed to expand on this point.

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. However, it does not indicate what the direction of such refreshing will be. If WG is suggesting that LBAP duties are removed from LAs we believe that this would undermine

the system by removing vital support from local groups. The LBAP groups are mostly made up of local people who are there voluntarily. Any policy produced by WG will not be able to change the structure of LBAPs as the people involved in them are not bound to such policy. If the intention is to use LBAPs and LA roles to help implement actions for this plan then resourcing will need to be specifically targeted. Most LAs in Wales have scaled back their ecological functions and are only just able to manage their statutory planning responsibilities, most have removed ecology staff, and therefore there is absolutely no capacity in LAs to assist in implementation of the additional action proposed. However, it is worth noting that many of the elements mentioned within the plan are already being done at a ground level. It is of concern that WG and possibly the top levels of WBP are unaware of the delivery of local action, it is therefore suggested that communication between WG and WBP needs to be strengthened, else local community action is unlikely to be able to contribute towards delivery of this plan.

Clarification should be provided in relation to what is meant by 'natural resource management legislation' in the third point of the list of elements. This has not been mentioned previously, is this relating to the Environment Bill?

5. What additional action would you wish to see?

We would like to see WG recognising that the LBAP system is continuing to work without any high level policy in place and that this system is already delivering regardless of the overarching policy. 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 is acknowledged and appreciated.

We would like to see an action relating to all public bodies reporting on their actions in relation to the NERC Duty and sanctions where they have not adequately discharged that duty. 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 are able to deliver public sector land management and 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 with support to continue these roles and to gain impetus to continue to seek improvements. It is also essential to support LBAPs as the main delivery mechanism for local action and links with communities, volunteer groups, local businesses and local biodiversity expertise.

Practical on the ground action. There is no mention of any specific action that would actually result in a positive outcome for biodiversity. All of the actions are supportive and knowledge based, none will actually deliver the required practical on the ground action that will be absolutely necessary if we are to see a recovery in our declining nature. We need to understand how to focus action appropriately, how it will be resourced, and who will be responsible for delivery of what. LBAPs can only do so much, based on their membership interests and resources available. The only mechanism to steer LBAPs to deliver action for nature recovery is to ensure that local authority staff, Biodiversity Officers and Ecologists, are in place to take that role. It should also be noted that LBAPs are unlikely to be able to deliver the large scale projects suggested as needed in the plan, without significant support and resources. Supporting regional working (e.g. GlamBAG and GGBAG) to take such projects forward should be specifically included in the plan. Whilst, LBAPs remain the best link to local communities and local expertise and knowledge.

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 by biodiversity professionals that other WG departments attend the WBP Conference and that workshops are held to discuss with such people (e.g. transport, healthcare, business) how they can better engage with the biodiversity sector. Actually discussing with them what they can do and what they think is unreasonable would be the best approach.

The majority of businesses won't deliver anything unless they have to. To maximise this opportunity, there has to be an incentive or a sanction to encourage them. BREEAM was supposed to deliver positive outcomes for biodiversity but many developments miss out ecological credits as they don't have to get them. There could be consideration of making some simple but effective biodiversity measures mandatory for new builds, e.g. x meters of pollinator friendly planting, bird or bat box per house, solar panels on all new buildings (indirectly positive outcome for biodiversity). If certain simple measures could be delivered as mandatory it would become more mainstream and cheaper to incorporate with time.

Grants for infrastructure, regeneration projects and businesses could include biodiversity requirements. WG grants for all sectors should take into account biodiversity requirements (as per NERC) and ensure that applicants are not penalised due to seasonality requirements. Maybe there could be a small grant scheme for businesses to make their land holdings more biodiversity friendly, e.g. install green/brown roofs, ponds and generally improve the green infrastructure of the environment that they have control over.

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

Acknowledge that the LBAP system works on a basic level and that the LA officers have a vital role in steering LBAPs and as go between from LBAPs to WBP Strategy Board.

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.

Clarify NRW's roles within the planning system to ensure that decisions are being taken based on appropriate advice. Certain issues that have traditionally been assigned to NRW as a statutory consultee currently appear to be stepped back from. With changes to policy and direction within NRW and with further legislation changes the role of each organisation in the public sector in relation to natural resource management/biodiversity etc. needs to be set out clearly. These changes have far ranging implications for the way we all work, not just for NRW; so clarifying specific roles needs to be undertaken.

WG should gain knowledge and understanding of the potential delivery mechanisms for such plans. Only through understanding how biodiversity requirements are delivered at a local level and what the constraints are, can a plan actually reflect a realistic approach that will make a difference to the biodiversity resource in Wales. It would therefore recommend that WG engage more directly with LAs.

Better administration of biodiversity related project funding is needed. Historically, public sector biodiversity funding is short term and uncertain. LAs are well placed to deliver local action that meets the aims and objectives of NRW and the WG and the LA partnership grants are a key mechanism for delivering these aims. A firm commitment from NRW / WG to back up recent suggestions for a move towards 3 year funding programmes would be welcomed.

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

Work with other WG departments first and lead by example. Integrate biodiversity conservation delivery into other sector funding e.g. for regeneration or infrastructure projects. Grants for infrastructure, regeneration, health projects and businesses could include biodiversity requirements. WG grants for all sectors should take into account biodiversity requirements (as per NERC) and ensure that applicants are not penalised due to seasonality requirements.

Ensure that large projects have several deliverable elements so different sectors are not competing with each other. E.g. windfarm community grants which are decided by public votes on the internet often force competition between e.g. sports and biodiversity.

Go back to the system of having disseminated targets like the former Wales Biodiversity targets. If it is done properly essential works can be disseminated through levels of complexity down to local levels and the funding distributed accordingly.

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.

Listen to and appreciate the work being done on the ground.

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.

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.

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?

Working with biodiversity/ecosystems requires long term work programmes with appropriate resources. Short reporting timeframes are essential to ensure resources are in the right place, priorities are reviewed appropriately and improved communication mechanisms are in place.

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 NERC Duty has been mentioned throughout the consultation – the duty only covers biodiversity, maybe this should be broadened to include ecosystems and their functions.

Man made ecosystems can play a huge role in conserving biodiversity and in creating artificial ecosystem services. Green/Brown roofs/walls should be insisted upon via the planning system along with other simple but innovative techniques.

Note comments provided in relation to the need to appropriately resource and support for LAs and LBAPs; as the main delivery mechanism for on the ground action, local community engagement, other sector engagement, frontline defence of biodiversity at a local level from development, local expertise and local knowledge of current status of flora and fauna. Without such support it is likely that biodiversity decline will get significantly worse over the next few years.

We have concerns about the inconsistency of language and definitions plus the use of complicated language for the wider public to engage with, the plan should address these issues fully to enable full engagement. On pages Pi and P3 – “Biodiversity – the variety and abundance of the natural world” – this definition is clearly incorrect and it is disappointing that a WG document has this kind of mistake in its opening sentence. If these elements are seen as essential to the goals set out in the document then this should be amended to “Biodiversity and the variety and abundance of the natural world”.

Next steps mention a communications plan and evidence plan. Whilst we have numerous plans, consultations and programmes for further plans it is more important at this stage to have delivery of action on the ground for the issues highlighted in this document. We need to act ASAP to address the decline in biodiversity and that involves delivery of practical targeted work on the ground.

We feel that the plan doesn't set out anything new. Much of the issues, goals and actions have been looked at within the Sustaining a Living Wales consultation. It is worrying that progress on these issues has been and continues to be slow whilst biodiversity continues to decline.

During this consultation period Butterfly Conservation discovered that the only site for High Brown Fritillary in Wales is under threat from actions taken under a Glastir agreement. The SSSI at Old Castle Down is being managed by the Commoners with the aim of eliminating bracken – a key component of the High Brown Fritillary habitat. The Commoners have SSSI consent for this work and a Glastir agreement and are, therefore, not at fault here. This is an example of an obvious failing in communications and integrated working between WG and NRW. It highlights the need for WG to get its own house in order and it is hoped that WG will use the Nature Recovery Plan for Wales to do this.