yn rhoi cartref i fyd natur giving nature a home

Call for evidence and projects to inform the development of the National Development Framework - Response from RSPB Cymru

1. RSPB Cymru welcomes the opportunity to respond to the call for evidence and projects to inform the development of the National Development Framework (NDF). We believe the NDF should be a genuinely spatial plan that, in considering where development should be located, looks at how it fits with other priorities, including 'a biodiverse natural environment with healthy, functioning ecosystems' (as per the Resilient Wales Well-being Goal).

2. We note, and welcome, the legal requirement brought into effect via the Environment (Wales) Act 2016 for the NDF to set out how, in preparing it, Welsh Ministers have taken account of relevant policies in the national Natural Resources Policy (NRP). In the NRP, the Welsh Ministers are required to set out their general and specific policies for contributing to achieving the sustainable management of natural resources (SMNR). The objective of SMNR is to maintain and enhance the resilience of ecosystems and the benefits they provide, and in so doing meet the needs of present generations of people without compromising the ability of future generations to meet their needs, and contribute to the achievement of the Well-being Goals. The NDF has a critical role to play in helping to achieve this objective, which will require protection of existing biodiversity assets, as well as creation and restoration of habitats to build resilient ecological networks.

3. In defining SMNR, the Environment Act recognises the critically important role of ecosystems in providing benefits to society, and underpinning sustainable development, and the contribution that ecosystems can make across the Well-being Goals. The Explanatory Memorandum (EM) that accompanied the Environment Bill[1] explained that the approach to SMNR is based on the ecosystem approach described by the Convention on Biological Diversity, which seeks to maintain the integrity and functioning of ecosystems as a whole to avoid rapid undesirable ecological change. It states that the role of the ecosystem approach in the management of natural resources is to make explicit the link between the status of natural systems and ecosystem services that support well-being. Ecosystem services include provisioning services (e.g. the provision of food, fibre or fresh water), regulating services (e.g. climate regulation and flood alleviation), cultural services (e.g. recreation, tourism, cultural heritage and aesthetic experience – with benefits to physical and mental health and well-being), and supporting services (e.g. soil formation, nutrient cycling and water cycling).

4. In making the case for new legislation, the EM highlighted that "*key evidence, such as the 2011 National Ecosystem Assessment on the state of UK ecosystems, shows a continuing decline in*

[1] http://www.assembly.wales/laid%20documents/pri-ld10201-em/pri-ld10201-em-e.pdf

biodiversity with around a third of the services provided by our natural environment either degraded or in decline…Overall, there is a substantial evidence base which highlights that more integrated management of our natural resources is needed, which better recognises the value of our ecosystems and the services they provide" (para 23). While SMNR was identified (in the EM) as the way to deliver this, it was made clear throughout the scrutiny of the Environment Bill that it does not replace the existing legal framework for nature conservation, but rather acts along with it. Indeed, we consider nature conservation tools, including designated sites, to be fundamental to delivering the ecosystem approach (and we note that consideration of the intrinsic value of biodiversity is a key aspect of the ecosystem approach, and included in the Environment Act's SMNR principles).

5. Wales' first statutory State of Natural Resources Report (SoNaRR)[2], published in October 2016, reported losses of habitats and species' populations over at least the last century, indicating chronic declines in the diversity of Wales' natural resources and ecosystems. It also notes that we may see further declines due to past events (e.g. further depletion and losses of species populations due to historic habitat loss). This is a concern not least because diversity (including biodiversity) is fundamentally important to ecosystem resilience. Furthermore, it is a direct indication that Wales' ecosystems are *not* resilient, because species are not recovering.

6. The first NRP has yet to be published; RSPB Cymru recently responded to the Welsh Government's consultation to develop the Policy (our response is provided for information). However, we wish to highlight that the NDF has a key role to play in supporting the delivery of the NRP (and thereby supporting the delivery of SMNR). In addition, the Welsh Government should use the NDF as one tool for the fulfilment of its duties to biodiversity – the 'biodiversity and resilience of ecosystems duty' set out in section 6 of the Environment Act, and the Government's specific responsibilities for priority species and habitats under section 7.

Building ecosystem resilience

7. The consultation to develop the NRP was clear that actions need to be taken to support ecosystem recovery. In addition to securing appropriate management for designated sites (including SSSIs and Natura 2000 sites) this means treating these sites as central to functional ecological networks (wherein sites should become 'more, bigger, better and more joined up' in accordance with the 2010 report 'Making Space for Nature' otherwise known as the Lawton Review[3]) – as set out under the theme of '***Improving individual and community well-being by taking a place and landscape based approach***' in the NRP consultation. (We have suggested this theme should be re-worded to *Taking a place and landscape based approach to protecting and restoring nature, thereby reversing species' declines and building ecosystem resilience while contributing to community and individual well-being*).

8. The NDF should support the development of ecological networks through spatial (mapped) policies - not only by providing protection for designated sites themselves, but also by

[2] https://naturalresources.wales/our-evidence-and-reports/the-state-of-natural-resources-report-assessment-of-the-sustainable-management-of-natural-resources/?lang=en

[3] http://webarchive.nationalarchives.gov.uk/20130402151656/http://archive.defra.gov.uk/environment/biodiversity/documents/201009space-for-nature.pdf

safeguarding other important biodiversity areas, buffer areas around designated sites, and target areas for habitat restoration (integrating species' requirements) to improve connectivity between sites, and in the wider landscape. It is vital that Area Statements, under the Environment Act, which will identify area based priorities for delivering SMNR, are used as a key evidence base for the identification of spatial policies in the NDF.

Nature based solutions

9. Another theme set out in the NRP consultation is that of ***Delivering nature-based solutions to improve resilience and the benefits derived from natural resources***. (In our response we suggested this should be re-worded to *Delivering nature-based solutions through using and managing natural resources in a way that improves social, economic and ecological resilience)*. It is clear in the consultation that 'nature based solutions' encompasses both the development of green infrastructure and the protection or management of existing natural assets.

10. The NDF has an important role to play in supporting the integration of green infrastructure into land use planning and development management. As part of this, the NDF should also include spatial policies to recognise the important and valuable services, or benefits, provided by existing habitats and the potential to restore and/or enhance them – for example, to support catchment management approaches to flood risk through protecting and enhancing upland habitats (e.g. peatlands) and wetlands. These strategically important natural resources should be safeguarded, and enhancement opportunities identified, through spatial policies in the NDF.

11. We also see an important role for the planning system in helping to build and support ecological resilience, by requiring that the needs of species are integrated into the development of green infrastructure projects; this should be part of planning authorities' (including the Welsh Government) delivery of their biodiversity duties.

Ensuring sustainable development

12. The third theme set out in the NRP consultation is that of '***Accelerating green growth by increasing resource efficiency, renewable energy and supporting innovation***'. We have commented that this should be amended, in the published NRP, to reflect the need to *increase resource efficiency and move towards a circular economy while ensuring sustainable development - harnessing the potential of natural resources without compromising the objective to maintain and enhance the resilience of ecosystems and the benefits they provide*.

13. The NDF must support truly sustainable development, recognising both the constraints and opportunities this entails. For example, 'increasing renewable energy' is an important aim, which we support, but one that needs to be delivered in the context of understanding and avoiding impacts on biodiversity and ecosystems. The RSPB's 2050 Energy Vision report identifies how ambitious targets for emissions reductions can be met through harnessing renewable energy in harmony with nature[4].

14. Achieving a truly sustainable low carbon future is possible through strategic spatial planning, building on the approach taken through TAN 8. This would help ensure that low ecological risk sites for energy infrastructure are maximised whilst avoiding unacceptable ecosystem impacts.

[4] https://www.rspb.org.uk/Images/energy_vision_summary_report_tcm9-419580.pdf

Also important to consider will be supporting research to fill the ecological data gaps that still exist, and helping to develop wildlife-friendly innovation in the energy sector. Finally, to reduce the need for energy infrastructure and consequently wildlife impact risks in the first place, reducing energy waste should be a priority focus. For example, energy efficiency should be prioritised through the NDF (as it is in Scotland's National Planning Framework) and ambitious policy measures developed accordingly.

15. We understand that this consultation represents the first of a number of stages in the process to develop the NDF, which is due to be published in 2020. RSPB Cymru is keen to continue to engage with this process.

For further information, please contact Annie Smith, Sustainable Development Manager – [redacted]

yn rhoi cartref i fyd natur giving nature a home

Consultation to inform the development of the Natural Resources Policy
Response from RSPB Cymru

1. RSPB Cymru welcomes the opportunity to respond to this consultation. We have also provided input via a number of the stakeholder workshops and other meetings, and we have contributed to the response provided by Wales Environment Link.

2. In this response we provide comments on the priority themes and key challenges identified, as well as on key steps required and barriers to be overcome, as requested. We are particularly concerned that the Natural Resources Policy (NRP) should be clear as to what needs to be done in relation to biodiversity – a specific requirement of the Environment Act, and we provide some specific comments in this regard.

3. We understand that the Natural Resources Policy (NRP) will be a high level, strategic policy, and that it is aligned with the Programme for Government. The Programme for Government is itself a high level document, which promises further development of four Strategies. It has not yet been made clear how stakeholders will be able to input to these strategies – we would welcome the opportunity to engage in their development.

General comments

4. We consider it essential that the NRP sets out the legal definition of SMNR and purpose of the NRP itself, as well as the principles of SMNR which the Welsh Government is required to apply in developing the NRP. This would help to better frame the priority themes in the context of SMNR. The wording from the Environment Act should be used, to ensure that none of the meaning is lost through efforts to make definitions more reader-friendly (after all, the Policy will be much more regularly referred to than the Act itself once it is in place). An example of this happening is the summary provided of the SMNR principles in Annex I of the consultation document, in which the nine principles are set out in 'plain English'. Principle (f) – '*take account of the benefits and intrinsic value of natural resources an ecosystems*' – has been reframed in a way that focuses only on benefits ('*Understanding all of the benefits we receive from our natural resources*') and fails to note the intrinsic value of natural resources and ecosystems (reference is made to cultural ecosystem services, but this is not the same thing). This could lead to the legal requirement to take account of intrinsic value being lost, in practical terms, which we consider unacceptable.

5. We also emphasise that the Environment Act specifically requires the Welsh Government to set out what needs to be done in relation to climate change and biodiversity (we focus our attention upon the latter in this response), which does not come through strongly in the consultation document.

6. A further requirement of the legislation is for the Welsh Ministers to have regard to the State of Natural Resources Report (SoNaRR) in developing the NRP – therefore the final NRP should include key messages from the SoNaRR, which highlight the need for action. SoNaRR shows losses of habitats and species' populations over at least the last century, indicating chronic declines in the diversity of Wales' natural resources and ecosystems. It finds that none of Wales' ecosystems is currently resilient, with the fact that species are not recovering being a key indicator of this. This points to the need for a step change, as recognised by the Cabinet Secretary in her foreword; the priority themes as currently set out do not convey this effectively, neither to they give any sense of urgency.

7. Finally, the three priority themes are very high level, and Government policies or programmes are likely to deliver (or have the opportunity to deliver) against more than one of them. This should be made clear in the final NRP.

Biodiversity

8. As noted above, the Environment Act requires the Welsh Ministers to set out, in the NRP, what they consider should be done in relation to biodiversity. This gives the opportunity to set out the Welsh Government's commitment to halt and reverse biodiversity loss and deliver the Aichi 2020 targets (a recent analysis by RSPB and partners shows that all countries need to significantly raise their level of ambition if the Aichi targets are to be met[1]).

9. We welcome the reference to the Nature Recovery Plan in the consultation document, but consider that the final NRP must be much more explicit that it (the Nature Recovery Plan) is to be effectively embedded as part of the framework for delivering sustainable management of natural resources (SMNR). We absolutely agree that embedding biodiversity action into Area Statements and Well-being Plans is vitally important; the NRP should make explicit that the preparation of these will need to draw directly from the Nature Recovery Plan, including its Action Plan. As noted in the consultation document, this approach will help public authorities to deliver their Biodiversity and Resilience of Ecosystems duty (under s6 of the Environment Act).

10. We welcome the narrative under the priority theme of '….taking a place and landscape based approach', which emphasises the importance of restoring habitats in achieving resilience – further thoughts are provided under our discussion of that theme.

11. However, in setting the ambition to work at scale, we consider that the NRP should make stronger reference to valuable nature conservation tools that exist to maintain and enhance the resilience of ecosystems. Protected sites are key among these, and the NRP should include a commitment to prioritise monitoring and management of these sites to attain favourable condition/favourable conservation status. We note that the NRP's predecessor – the Natural Resources Policy Statement – indentified the need to improve the management and use of protected sites, but feel this has been somewhat lost in the current consultation

[1] http://www.birdlife.org/sites/default/files/score_card_booklet_final.pdf

document and needs to be brought to the fore. We also welcome (as we discuss further later in this response) the consultation document's recognition of the role of protected sites at the centre of resilient ecological networks, in line with the recommendations of the 'Lawton Review'. There is substantial evidence that protected sites remain important in maintaining and enhancing wider biodiversity together with their target features in the context of climate change[2].

12. Site protection and management is currently under-prioritised and under-resourced. If the objective of SMNR is to be delivered this must change, and we would welcome a clear commitment to this in the NRP.

13. The fundamental role of species conservation and recovery in achieving SMNR must also be asserted in the NRP. (The SoNaRR states, for example, '*for the ecosystems of Wales to be resilient we would expect the full range of native species and habitats that remain to be maintained, with populations either stable or increasing*'). We have commented further later in this response on the need to integrate species priorities into consideration of 'nature based solutions' and a 'place and landscape based approach'.

14. The NRP should also commit to setting relevant milestones and measures in relation to our progress in halting and reversing biodiversity loss, under the Well-being of Future Generations Act (WFG Act) framework of indicators and milestones, the Nature Recovery Plan, and the SoNaRR. The National Indicators established under the WFG Act include a priority species indicator (based on the section 7 list), which we consider to be a key measure of whether SMNR is being achieved (as the SoNaRR points out, the current decline of species, and their failure to recover, is a signal that ecosystems are not resilient). We note that during the passage of the Environment Bill the Welsh Government made clear that the WFG Act framework was, in its view, the appropriate place to set milestones and measure progress for national biodiversity indicators – a view that was endorsed by the Environment and Sustainability Committee's Stage 1 report – we would welcome a reassertion of the Welsh Government's commitment to this use of the WFG Act framework in the NRP.

15. The condition of protected sites is recognised both by SoNaRR and by the consultation document to be an important indicator of resilience (or, currently, lack of it), but SoNaRR reports evidence gaps relating to the condition of SSSIs. We call for a clear commitment in the NRP for appropriate management to achieve favourable condition to be in place for all of Wales' designated sites by 2026 (which accords with the earlier Environment Strategy commitment, but recognises that attaining favourable condition may be a longer term goal for some sites due to wider environmental issues). In this regard we note the important work done by NRW in identifying the key actions required to bring Wales' Natura 2000 sites into favourable conservation status. Monitoring of site condition (including for domestic

[2] See– Thomas, C.D., et al (2012) Protected areas facilitate species' range expansions; Johnston, A., et al (2013) Observed and predicted effects of climate change on species abundance in protected areas; Gillingham, P. K., et al (2015) High Abundances of Species in Protected Areas in Parts of their Geographic Distributions Colonized during a Recent Period of Climatic Change; Sanderson, F. J., (2015) Assessing the Performance of EU Nature Legislation in Protecting Target Bird Species in an Era of Climate Change.

designations) by NRW will need to be prioritised in order for this to be reported against in future SoNaRRs.

Key steps that need to be taken, and barriers that need to be addressed

16. **Brexit represents a threat and an opportunity for SMNR**
    We would welcome a clear statement within the NRP of the Welsh Government's commitment to retaining, and building upon, EU derived nature conservation and environmental protection legislation when the UK leaves the EU – recognising the fundamental role it has to play in achieving SMNR. It is also important to recognise that, in exiting the EU, we will be losing access to EU complaints procedures that allow any citizen to file a complaint to the European Commission free of charge about any Member State measure which they consider incompatible with Union Law, without needing to demonstrate a formal interest in bringing proceedings.

17. The importance of ongoing international co-operation to deliver effective conservation action for shared natural resources, such as migratory birds, marine wildlife, and internationally protected biodiversity should also be recognised.

18. In relation to this, we note that the recent 'Fitness Check' of the Birds and Habitats Directives undertaken by the European Commission found the Directives to be fit for purpose. In addition to strong support from nature conservation organisations, we would emphasise that business responses to the Fitness Check process showed a broad consensus for maintaining the legislation unchanged in the interests of investor certainty, as well as strong support for improved implementation (for example, a recent letter sent by NGOs and businesses to Vice President Timmermanns is provided with this response).

19. In addition, we were surprised that the consultation document does not say more about the Welsh Government's commitment to developing future land use support policy – to replace the Common Agricultural Policy – under the banner of the NRP, clearly in the context of achieving SMNR. This is a clear opportunity, and we have welcomed the Welsh Government's process of stakeholder engagement around this to date. We would welcome a clear statement of the Welsh Government's intention to develop its new land management support policy in the context of SMNR in the final NRP. The same applies, of course, to the development of future marine policy, particularly in relation to the need to replace the Common Fisheries Policy. Partnership statements expressing the direction the RSPB wishes to see taken for land and marine management are provided with this response.

20. **A new framework for governance and delivery of the Nature Recovery Plan must be established quickly**
    New governance arrangements must be quickly established in order to maintain the momentum towards identifying the priority actions to halt and reverse biodiversity decline, as well as providing wider benefits, which will support achievement of SMNR. This process, coupled with the development of area statements, should help to inspire the formation of partnerships, and identify shared priorities for Government investment and targeted fund-raising.

Insufficient investment in conservation delivery to improve resilience through conserving and enhancing biodiversity is currently a key barrier to achieving SMNR**.** Both the priority afforded to management of designated sites (by the Welsh Government and in turn NRW), and the budget available to do so has diminished to an unacceptable extent in recent years. Glastir has been relied upon as a funding mechanism for designated site management, but there are numerous concerns about the effectiveness of this scheme in relation to biodiversity objectives (discussed further below), and the evidence from SoNaRR on failure to achieve favourable condition is clear.

21. The loss of biodiversity and nature conservation specialists due to budget cuts within NRW and local authorities also presents a significant barrier to delivery. A current barrier to delivering the Nature Recovery Action Plan is lack of support and capacity in Local Authorities to promote and co-ordinate biodiversity work; addressing this through allocation of resource would also help Local Authorities and others comply with their Biodiversity and Resilience of Ecosystems Duty.

22. The Sustainable Management Scheme is a welcome funding mechanism. We would recommend that, in addition to its important focus on supporting partnerships, it should require a portion of all bids to focus on concrete actions to build ecosystem resilience (this draws on the example of the EU LIFE Nature fund).

23. Given the advent of the new legislation (both the WFG Act and the Environment Act), and its recognition of the benefits we derive from natural resources and ecosystems, we believe there is a stronger case than ever to ring-fence proceeds from wind turbines erected on Government-owned land and redirect it towards building ecosystem resilience. Commitment to other funding streams, such as the Landfill Tax Community Fund, is also essential. The RSPB is currently advocating that this fund be specifically embedded in the Landfill Tax Bill to secure its longevity.

24. Recommended improvements to Glastir must be implemented

Wales' agri-environment scheme needs to be improved if it is to provide benefits for targeted priority species (via Glastir Advanced). A review undertaken in 2014 made a number of recommendations as to how to improve the delivery of the scheme for priority species, including:

- Working with NGOs to improve the data used for targeting action for species;
- Facilitating co-operative action between farmers to secure the full suite of species needs at a scale capable of supporting populations;
- The provision of appropriate advice, guidance and ongoing support to participating farmers;
- Resolving the tensions between designated sites and priority species – i.e. ensuring the flexibility to manage for priority species living in protected areas (where the species is not included as part of the designation); and
- Doing away with an overly uniform approach to management of the uplands and woodlands and moving towards a system that achieves the required habitat conditions for priority

species if present.

25. Glastir will remain an important tool in the early years of the NRP, prior to the UK leaving the EU (and the CAP). Addressing the shortcomings of the scheme as identified by the review will enhance its ability to contribute to achieving SMNR.

26. **Forestry regulation – increasing EIA threshold to 20 or 50 hectares would run counter to achieving SMNR**
    The recently concluded consultation on new EIA Regulations proposed an increase in the area of trees that can be planted (under one scheme) without a requirement to check the environmental impact of the planting with NRW or local stakeholders, from 5 hectares to 20 or 50 hectares. This would put at risk vast areas of inadequately mapped and unprotected wildlife habitats from afforestation, particularly with non-native timber crops, with no scrutiny from NRW. We argue that the existing 5 ha threshold is already too high, as significant areas of priority habitats can currently be planted with trees without any Government or local stakeholder scrutiny. We would like to see the threshold reduced to 2ha to protect smaller sites, e.g. traditional meadows, whose dramatic decline has been recognised in the SoNaRR.

27. The consultation pointed to the use of the existing woodland opportunities map, developed by the Welsh Government, as a suitable alternative to a formal EIA assessment. However, while the maps are useful as strategic pointers, the data underlying the map, particularly the data relating to species, is not sufficiently refined to safeguard against potential negative impacts on priority species.

28. We cannot accept that the proposal to increase the EIA threshold was made in the context of seeking to achieve SMNR, and we urge the Welsh Government to at least retain (and ideally reduce) the 5 hectare threshold. The RSPB's response to the recent EIA consultation is provided as additional information with this response.

29. **Enforcement of basic standards to unlock the potential for PES markets**
    If the Welsh Government's ambition of developing markets for ecosystem services is to be realised, we believe it will be essential to ensure regulation is in place to secure basic standards are met by land managers and industry. As one participant at the 7 December workshop on the NR Policy put it – people are not willing to pay polluters not to pollute. Once a baseline is enforced, markets for additional goods and services – such as clean water, wildlife, infrastructure to support tourism and recreation – could be established. We have long argued that stronger enforcement of cross compliance is necessary; however, with our exit from the CAP this will need to be replaced. General Binding Rules, as applied in Scotland, should be considered.

30. **The NRP must provide greater focus on the marine environment**
    While we recognise the importance of Wales' National Marine Plan in securing sustainable development of our seas, we note that there is still work to do to ensure it reflects the multiple benefits provided by ecosystems and the need to safeguard biodiversity, in addition

to identifying priorities for development. Furthermore, we would emphasise that the Marine Plan will not be a tool for fisheries management. Ensuring that fisheries are not managed on a single species/stock basis alone, but in the context of the objective to maintain and enhance the resilience of ecosystems and their benefits, should be a key element of the NRP. For the avoidance of doubt, our comments elsewhere in this response about the important role of protected areas in achieving SMNR apply equally to the marine environment.

31. **Provide a steer for other key policies such as the National Development Framework**. The NDF has a clear contribution to make to SMNR, as recognised by the legal requirement for it to demonstrate how it conforms to the NRP. It would be helpful for the NRP to provide some direction as to how the NDF can support delivery of the priority themes. This should include, for example, protecting important areas for 'nature based solutions' (e.g. peat soils) – including those with restoration potential, requiring integration of green infrastructure and other nature based solutions in relation to developments of national significance.

32. **The 'step change' required has to be embraced and delivered across Government.** The current Welsh Government proposal is an example of a Welsh Government policy that is rooted in 'old thinking'. It does not embrace the new, bold approach to sustainable development embodied in the WFG Act, nor recognise the real importance of natural resources and ecosystems (thereby failing to live up to the ambitions of SMNR, and to deliver on the Government's biodiversity duties under the Environment Act). We are deeply concerned that the Government's failure to revisit the proposal (by re-examining the *problem*, rather than seeking to tweak the identified motorway *solution*) sends a dangerous signal about the Government's own commitment to leading the delivery of Wales' ground-breaking legislation. If the change is to be delivered across the public sector and inspire new partnerships with business and the voluntary sector, the whole of Government must commit fully to the new approach.

Comments on the key challenges and priority themes

Key challenges

33. We suggest an additional challenge should be included, recognising the urgent imperative of addressing biodiversity decline, e.g. '***halting and reversing biodiversity decline in line with international commitments***'. This would lend weight to the statement in the Cabinet Secretary's foreword that the Environment Act '*enshrine*[*s*] *in legislation the commitment to key international obligations'*.

34. While we agree it is important, and welcome its inclusion, we would also recommend that the challenge '*Improving the quality and connectivity of our habitats*' be amended to reflect the wording of the Environment Act around ecosystem resilience – '***Improve/enhance the resilience of ecosystems, taking account of diversity (between and within ecosystems), connectivity, scale, condition and adaptability***'.

35. We welcome the reference to safeguarding and increasing carbon stores, but note that the consultation document also refers to other ways in which natural resources and their management contribute to mitigating against climate change, including resource efficiency measures and renewable energy generation. This challenge could be reworded to reflect this - **'*Mitigating and adapting to the effects of climate change through safeguarding and increasing carbon stores and supporting renewable energy development in harmony with nature'*.**

36. The challenge '*Improving health and equity through access to quality green and blue spaces*', unlike the others in the list, puts the benefit or opportunity ahead of the action needed in terms of sustainable management of natural resources (SMNR). We would suggest the challenge is really about improving local environmental quality, including the natural environment, and provision for access so that more people have the opportunity to benefit from high quality environments. We would suggest rewording along these lines, e.g. **'*Improving the quality of local environments to enable more equitable access to nature and resulting benefits to health*'**.

37. The challenge of '*Maintaining our productive capacity*' should also be reworded, as we feel it could currently be read as a commitment to maintaining production, whether or not it is in line with SMNR. We suggest '***Supporting sustainable production, providing a wide range of benefits for people and nature***'.

Priority themes

38. We recognise there are benefits to ensuring strong resonance between these priority themes and the Programme for Government, as it is vitally important for all government departments and the wider public sector to recognise the role of SMNR and their essential contribution to achieving it.

39. The Cabinet Secretary, in her foreword to the consultation document, stated '*The evidence in relation to the challenges our natural resources face is also clear and underline that a step change is needed in order to address the unsustainable trends within the State of Natural Resources report*'. We wholeheartedly agree. If it is to effect this step change, we believe the need for change needs to be more clearly expressed by the priority themes. In addition, rather than simply reflecting how natural resources can support the aims of the programme for Government, they should be more clear about how they will contribute to SMNR. We offer some suggestions in this regard below.

40. *Accelerating green growth by increasing resource efficiency, renewable energy and supporting innovation*

We are aware that concerns over the phrase 'green growth' were raised during at least some of the workshop sessions, as the meaning of the term was hard to understand; also, the commitment to *accelerating* growth is of concern, unless it is made more clear how this relates to particular sectors that have capacity to contribute to delivering the objective of SMNR.

41. It is vitally important that this cannot be read as simply a commitment to sustained development without recognising both the constraints and opportunities that achieving SMNR presents. For example, 'increasing renewable energy' is an important aim, which we support, but one that needs to be delivered in the context of understanding and avoiding impacts on biodiversity and ecosystems. The RSPB's 2050 Energy Vision report identifies how ambitious targets for emissions reductions can be met through harnessing renewable energy in harmony with nature[3].

42. We note the Welsh Government's interest in the development of tidal power. The RSPB recently welcomed Charles Hendry's recommendation that the Swansea Bay lagoon project should be treated as a pathfinder, to allow lessons to be learned about how to deploy this technology in an ecologically sensitive way. However, we note that this is a new and expensive technology; it must also not distract from the need for continued investment in existing affordable alternative and potentially more sustainable sources of renewable energy, and it must not cause needless harm to nature and fabulous ecosystems like the Severn. (http://www.rspb.org.uk/community/ourwork/b/martinharper/archive/2017/01/12/how-to-harness-the-tidal-power-of-the-severn-estuary.aspx)

43. In addition, from the discussions we have participated in it feels as though the commitment to move towards a circular economy and increase resource efficiency have been overshadowed by concern and confusion over the phrase '*accelerating green growth*' and would benefit from being brought out more strongly.

44. We welcome the recognition in the narrative of the potential economic importance of management of natural resources both for food and other goods and services, which presents opportunities particularly in the light of the EU referendum result. As noted above we expect the final NRP to set clearer direction in terms of developing new land and sea use policies in the context of SMNR.

45. We would suggest this priority theme should be reworded to reflect the need to ***increase resource efficiency and move towards a circular economy while ensuring sustainable development - harnessing the potential of natural resources without compromising the objective to maintain and enhance the resilience of ecosystems and the benefits they provide.***

46. *Delivering nature-based solutions to improve resilience and the benefits derived from natural resources*

It became clear during workshop discussions around this theme that 'resilience' in the context of this theme refers to 'social, economic and ecological resilience' as referred to in Goal 2 of the Well-being of Future Generations Act, rather than 'the resilience of ecosystems' which is the central objective of SMNR. While they are obviously very closely related, the former is broader, and it would be helpful to make this more clear in the

[3] https://www.rspb.org.uk/Images/energy_vision_summary_report_tcm9-419580.pdf

wording of the theme: '***Delivering nature-based solutions through using and managing natural resources in a way that improves social, economic and ecological resilience***'. The explicit inclusion of ecological resilience would go some way to addressing the concern that this theme is focused on utilitarian benefits of natural resources to the exclusion of their intrinsic value.

47. Building on this point, we consider it essential that the NRP makes clear that delivering benefits for biodiversity is an aim of this priority theme. The development of nature based solutions should make clear that their design should integrate consideration of what biodiversity needs – in particular the priority species and habitats listed under section 7 of the Act. This could influence the design of the solutions themselves – for example, what trees to plant in urban areas; how to design water treatment reed beds to provide habitat for key species; and so on. It could also mean *protecting*, as well as restoring, areas of habitat such as peatland, from land use change or development because of the benefits they provide. And it would mean carefully considering the impacts of 'natural solutions' on priority species and habitats – so that these could be avoided, mitigated or as a last resort compensated for. For example, a commitment to increasing woodland cover should not lead to planting in areas where it would damage populations of priority species and their habitats; a commitment to managed realignment should include provision of replacement habitat for species (such as lapwing) making use of the habitat that will be lost. The RSPB is currently investing in some research to support the integration of biodiversity into 'natural solutions' via Area Statements, which we will make available in due course.

48. We welcome the listed commitments under the international Nature Based Climate Action MoU, which do appear to reflect the need to integrate the needs of biodiversity (although it is unfortunate they do not refer to enhancing and restoring, as well as safeguarding, biodiversity).

49. ***Improving community and individual well being by taking a place and landscape based approach***
    The wording of this theme heading is confusing, given the narrative that follows it. The narrative places a welcome emphasis on the need to maintain and enhance the resilience of ecosystems through protecting, managing and restoring habitats at a large scale. It does not discuss the community and individual well-being benefits, which are explored in more detail under the previous theme. Unfortunately, the wording of the theme heading (and of the three theme headings taken together) could suggest that the NRP places no emphasis at all on the key actions needed to build ecosystem resilience.

50. The State of Natural Resources Report (SoNaRR) found that none of Wales' ecosystems is resilient; therefore building this resilience should be the absolute starting point of the NRP. During the workshops, a slide was shown that illustrated that this theme effectively underpins the other priority themes.

51. It was helpful and reassuring to see this slide and we would strongly urge that it be included in the final NRP. We also recommend that this priority theme be reworded, to '***Taking a***

place and landscape based approach to protecting and restoring nature, thereby reversing species' declines and building ecosystem resilience while contributing to community and individual well-being'.

52. We welcome the paragraph citing the 'Lawton Review', outlining the ambition to improve the condition of priority areas while expanding and making connections between them, to improve the resilience of ecosystems and help develop protected sites as the cores of large scale functional networks.

53. We consider it important that the final NRP is more explicit about the essential role of existing nature conservation tools in delivering this ambition and achieving SMNR – designated sites in particular, with their appropriate management to attain favourable condition being a key policy commitment.

54. Furthermore, beyond assuming that '*As opportunities for spatially targeted actions to build healthy resilient ecosystems that deliver key ecosystem services are identified, there will almost certainly be a strong correlation with priority habitats and species*' the NRP should make an explicit commitment to halting and reversing biodiversity decline by ensuring the needs of priority habitats and species are integrated into place and landscape scale approaches.

55. Without explicit commitments of this sort, there is a risk that species and habitats will be sidelined by a focus on ecosystem services, such that, not only could opportunities for positive measures be missed, but damage could be inadvertently caused (e.g. through creating a new habitat on an area that is already important for priority species).

56. We hope the comments in this consultation response are helpful in combination with the input we have provided via other routes. The RSPB is committed to ongoing engagement in implementing the Environment Act.

For further information, please contact Annie Smith [redacted]