

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

**10 September 2014 - 3 December 2014**

### **Consultation Responses 31 – 60**

**Ref: 0031 - Barry Lynes**

i am amatuer naturlist and active RSPB Volenteer.

I have received an email from the RSPB informing me about your nature recovery plan.

They informed me the good news about the plan, which i also welcome, but there are concerns it lacks a clear set of actions to put nature back on track of recovery.

Please note my concerns and PLEASE get this right for all of us and future generations.

**Ref: 0033 - Pamela Humphreys**

In conjunction with the RSPB I write today regarding the above

We need a full funded plan of action that meets nature's needs. Welsh Government thinks our wildlife will recover because a new approach called "Natural Resource Management" will integrate policies and plans to change the way people work across the environment in Wales. This process may go some way to help, but on its own it is not enough.

Improving our network of special places and most threatened and precious wildlife is essential. We need Welsh Government to invest in restoring our special sites and priority species and habitats. Our sites must be bigger, better and more connected and our threatened and precious wildlife restored. Commitment to improving these crucial nature conservation tools in the Nature Recovery Plan is essential.

Investment in scientific evidence is essential. We need to be able to see what's working and what's not – monitoring the condition of sites and trends for a full range of species and habitats is essential. This helps us see nature's needs and ensures we're using the right tools for the job. We can't restore the nature we've lost if we can't see what we're doing.

Welsh Government must show strong leadership and ambition by making it law to achieve nature's recovery. We need the Environment (Wales) Bill to enshrine in law long-term legally binding targets that promise to reverse declines in nature. We need the law to also declare it a duty of all public bodies "to further the conservation and enhancement of biodiversity" in their activities. This will give nature recovery

the power it needs to succeed.

**Ref. 0034 - Cardiff Biodiversity Partnership**

**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 places too much emphasis on the benefits to humanity of resilient ecosystems, and does not acknowledge the intrinsic value of the natural environment. Whilst a focus on societal benefits is appropriate, it should be balanced with a recognition of the intrinsic and non-monetary value of species and habitats. There is a reference to this point on page 4:- 'There is also a strong moral argument that we should take action to conserve species, habitats and ecosystems.', but this is not carried through for the rest of the document.

There is also a concern that the focus at an ecosystem level may not necessarily support those species which are neither critical to ecosystem function, nor protected by policy and law. Whilst we can state that more biodiverse ecosystems are more resilient, and that all species have their role in an ecosystem, it does not necessarily follow that all species are keystone species, nor that their loss from that ecosystem may cause it to deteriorate to an extent that it no longer functions.

This being the case, by focussing purely on ecosystems and ecosystem services there is a risk that non-keystone species, which do not otherwise receive statutory protection, may be left behind.

It is rightly stated in the consultation that biodiversity both creates and benefits from ecosystem resilience. However an implicit assumption is made that if an ecosystem is functioning normally, then the species which inhabit that ecosystem will be supported. This will largely be the case, but not always, and there are some situations where measures to protect individual species are not embedded into normal habitat and ecosystem management. This is the reason why we have species action plans as part of the BAP process. As above, we are concerned that the ecosystem approach will not necessarily draw with it the full range of species present.

Therefore in our view the Nature Recovery Plan (NRP) should seek to act at all levels, from species to habitats to ecosystems. Furthermore, consideration should be given to seeking a form of protection for ecosystems, rather than simply managing them so that they continue to function. We recognise the difficulty in applying legal protection to an entity such as an ecosystem, which can be difficult to define, but nonetheless there should be a system of sanctions or inducements for those whose activities may compromise or enhance the function of an ecosystem.

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

The Ambition Statement should be amended to better reflect Principle 1 of the Ecosystem Approach under the Convention of Biological Diversity (CBD), which includes:- 'Ecosystems should be managed for their intrinsic values and for the tangible or intangible benefits for humans, in a fair and equitable way.'

Similarly, the preamble to the CBD itself includes the statement:- 'Conscious of the intrinsic value of biological diversity and of the ecological, genetic, social, economic, scientific, educational, cultural, recreational and aesthetic values of biological diversity and its components...'

Neither of these sentiments is reflected in the Ambition Statement, which concentrates solely on the 'benefits to society'.

Reference to Wales is omitted from the Ambition Statement, and this should be corrected to reflect the scope of the NRP.

A better ambition would therefore be:-

'To reverse the decline in biodiversity and ensure lasting benefits to the natural environment in Wales by building the resilience of our ecosystems.'

Or alternatively:-

'To reverse the decline in biodiversity and ensure lasting benefits to the natural environment in Wales by building the resilience of our ecosystems, by focusing on effective protection and management of those ecosystems.'

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

We suggest some amendments to these goals as below. In addition, The headline conclusion of the Lawton Review was that 'To make space for nature we need more, bigger, better and joined up sites to create a sustainable, resilient and more effective ecological network for England.' In our view, this should equally be applied to designated sites in Wales. This being the case, goals relating to improving our highest quality environments and to increasing habitat connectivity - address the 'better' and 'more joined-up' elements of Lawton's conclusion. However, there is no undertaking in these goals to make our protected sites 'bigger'. This is an omission, and we should be aiming to increase the number and size of our designated sites.

- To improve degraded habitats at scale

The term 'improve' is too vague, even when taking into account the strategic nature of this document. In any case it is meaningless, as to 'improve' (presumably the

condition of) a degraded site, does not necessarily entail bringing it back to something like its former state before it was degraded. 'Restore' would be a better term, as is used in the list of proposed goals on page ii.

The statement that we have a large extent of degraded or less diverse habitat should be justified with reference to sources of evidence. Also, use of the term 'less diverse' is ill-advised as some important habitats are naturally not as diverse as others but that does not mean they are less important. A reduction in the normal species-richness that would be expected for a habitat in favourable condition is one element of degradation, along with for example fragmentation or loss of extent.

Therefore we propose that this goal should be re-worded to:-

'To restore and enhance where appropriate, our degraded habitats, at all scales.'

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

These are two separate goals merged into one, and the supporting text reflects this i.e. the first paragraph refers to connectivity and the rest refer to other factors implicated in biodiversity loss such as eutrophication, pollution and invasive non-native species. We can see no justification for having merged these goals, and they should be separated.

The key negative factors of biodiversity loss should be listed in the supporting text, and reference should be made to Aichi Strategic goal A 'Address the underlying causes of biodiversity loss by mainstreaming biodiversity across government and society', and to Strategic goal B 'Reduce the direct pressures on biodiversity and promote sustainable use'.

The key negative factors of biodiversity loss listed should include, but not be limited to, habitat loss, agricultural intensification, resource over-exploitation, use of insecticides and herbicides, lack of enforcement of existing legislation and policies, as well as the diffuse pollution, eutrophication and invasive non-native species which are already listed.

Significant increase in habitat connectivity is difficult to achieve without either incentives for landowners or sanctions for developers. Areas which are strategically important for connectivity should be recognised as such, even if they do not directly support a habitat or species which receives statutory protection or which would be a qualifying feature of a statutory designated site. We suggest that such sites of strategic connectivity importance should benefit from some form of statutory protection.

Trees in an urban environment can provide significant habitat connectivity, as well as benefits related to ecosystem services such as climate change adaptation,

education and aesthetic value. Currently the protection afforded to these trees relates only to their wider public amenity value via the Tree Preservation Order (TPO) system. We suggest that the current TPO system be merged into the NRP, such that urban canopy cover, including newly planted trees and trees of limited amenity value, is protected for the ecosystem services that it provides.

- Improve management of our highest quality environments

Whilst supporting this goal in principle, it should nonetheless be clarified what is meant by 'highest quality environments'. Does this mean habitats or ecosystems? Does it refer to all statutorily designated sites, or just those that are in favourable condition? The term 'improve' is again of concern, as even an incremental increase in condition, no matter how poor the resulting condition, still counts as an improvement, but may be so small as to be of little real value. To maintain, restore and enhance statutorily designated national and international sites would be a better goal.

Page 15 mentions 'priority areas', and these should be defined. Are they NRW priority areas or designated sites such as Natura 2000, SSSIs etc? Are there priorities within the SSSI/N2K network that we are not aware of?

Reference to 'priority areas' should be removed altogether, as this phrase fails to recognise the nature conservation importance of all of Wales. Even urban areas support high quality environments, including bat roosting habitat, parks and gardens, and BAP habitats such as Open Mosaic Habitat on Previously Developed Land. These same areas may also be important for connectivity, particularly for mobile species. Furthermore, large population centres are where there is greatest interaction between people and nature. This presents the greatest opportunity to raise societal awareness of nature conservation issues, and so these areas should not be excluded from any measures to protect, manage and enhance nature conservation interests.

- Achieve 'no net loss' of biodiversity

The use of the term 'biodiversity' in this context is problematic. If it is to be taken in the widest sense as a proxy for 'nature' or 'wildlife' or 'the environment', then the phrase 'no net loss' is not appropriate, and should be replaced by 'no further degradation of' or 'no further reduction in the condition of'.

If, however, it refers narrowly to biological diversity or species richness, then the phrase no net loss should be clarified. For example, what is the benchmark from which there should be no net loss? Is it the current state of biological diversity as reported in the 2013 State of Nature report, or 50 years ago, which the same report takes as a starting point, or some historical state when biological richness in Wales was at its peak? A better goal would be to reverse the decline in biological diversity. At the very least, this goal should be brought in line with the current EU

consultation on the EU no net loss initiative.

The supporting text refers mostly to the mainstreaming of biodiversity across all sectors of government and society. We would like to be assured that, while this is a valid aim, it does not represent the entirety of what needs to be done to reverse the decline in biological diversity. Furthermore, to integrate consideration of biodiversity into wider decision-making and to mainstream consideration of biodiversity across all sectors of government and society, is important enough to warrant being a goal in its own right in the context of the NRP (see below).

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

We generally agree with this goal, but as in other areas of the NRP, the use of the term 'support' is too weak. Throughout the NRP stronger language such as 'ensure' or 'require' should be used. The supporting text for this goal refers to 'participatory planning' and the previous goal refers to 'mainstreaming biodiversity across...society'. Both of these elements should be combined to form a new goal of communicating, and raising societal awareness of, the importance of biodiversity and the contribution that it makes to our society, via ecosystem services.

To summarise our comments above, we suggest the following alternative goals:-

- To restore the condition of previously degraded priority habitats at all scales
- To address key negative factors of biodiversity loss
- To protect and enhance connectivity between protected and priority habitats
- To maintain, restore and enhance statutorily designated national and international sites
- To reverse the decline in biological diversity
- To integrate consideration of biodiversity into wider decision-making and to mainstream consideration of biodiversity across all sectors of government and society
- To put in place a framework of governance to ensure delivery, working together across sectors and strengthening our collective evidence base
- To effectively communicate, and raise societal awareness of, the value of biodiversity and of the ecosystem services that it underpins

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

The NRP should explicitly commit to an adopted plan of action, albeit regularly updated, rather than occasional cursory references to a 'rolling plan of action'. Whilst we accept that the consultation NRP is a high-level framework document, it will have little value unless it contains a firm commitment to a subsequent 'action' or 'delivery' plan. Here are our detailed comments on the individual proposed Strategic Actions:-

- Putting in place effective natural resource management

This Strategic 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. Such non-committal language should be avoided in order to prevent 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. 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 LDP's?

The supporting text 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 again demonstrates that biodiversity conservation is a 'nice-to-do' activity, rather than an essential requirement. If WG cannot commit to delivery then why would any other organisation or sector? WG must lead by example.

This strategic action refers almost entirely to the remit of Natural Resources Wales, and its title should reflect this i.e. 'Putting in place effective natural resource management by Natural Resources Wales'. Doing so would also clarify roles in relation to subsequent strategic actions.

- Delivering a Welsh National Marine Plan

We support this action but have no further comment.

- Facilitating Cross-sector policy integration

The supporting text states that it is important to strengthen the implementation of the

biodiversity duty under the CRoW Act 2000 and the NERC Act 2006 (the 'NERC 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 2000 for Welsh Government and 2006 for Public Bodies, but has not been widely implemented and no enforcement action in Wales has been taken. This demonstrates a lack of commitment to this legislation. As far as Cardiff Council is concerned, even auditing of our discharge of our NERC Duty has fallen away in recent years. The plan suggests that the duty 'could' be strengthened by links with the Environment Bill or Well-being of Future Generations Bill. As above, this non-committal language is a concern, and there should be a commitment that these pieces of legislation will strengthen the NERC 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, then financial resources will need to be targeted for this.

Phrases such as 'work with' and 'engage with' are too non-committal. The NRP should 'require' or 'ensure' that other policy areas deliver their responsibilities with respect to the NERC Duty, particularly in relation to agriculture.

- Funding our partners

Funding streams need to be fit for purpose and there should be moderation across Wales to ensure that funding is evenly and fairly distributed. There is always a danger that successful projects reach a critical mass of resources and expertise such that they become highly proficient at drawing down funds. Whilst not wishing to punish success in this aspect, it is a concern that in a competitive market place, these established projects deprive smaller projects of vital funding.

To this end, provision of funding should be accompanied by moderation to ensure that it is evenly and fairly distributed, and support put in place for those partners who may be promoting very worthy projects, but may not have the capacity and/or competency to administer the funding bidding and reporting process. On a similar point, match-funding is also difficult to find where there are already limited staff resources. As there are many pots of money for natural resource management, consideration should be given to bringing these together, lessening the 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.

Sources of funding must not be restricted to certain areas or to 'priority areas' as this fails to recognise the nature conservation importance of all of Wales. As above, even urban areas support high quality environments, including bat roosting habitat, parks and gardens, and BAP habitats such as Open Mosaic Habitat on Previously Developed Land. Furthermore, large population centres are where there is greatest interaction between people and nature. This presents the greatest opportunity to

raise societal awareness of nature conservation issues, and so these areas should not be excluded from any measures to protect, manage and enhance nature conservation interests.

Reversing biodiversity decline cannot happen quickly, and often work can only be undertaken within certain seasons. Therefore funding streams need to look long-term to ensure that all seasons are used to best advantage when undertaking habitat specific work. Similarly, confirmation of funding is often provided so late in the season that projects are adversely impacted and less likely to be delivered. Timely confirmation is therefore essential to enable efficient delivery of funded projects.

We are concerned that there are a number of funding streams not included under this action, for example Glastir and Local Authority Partnership Funding. All of these funding streams are critical to the delivery of biodiversity conservation work on the ground. It is also not clear whether the term 'nature organisations' in the first paragraph encompasses Local Authorities, as many of them administer LBAPs.

Specifically in relation to the Rural Development Programme (RDP) we would recommend that the areas covered by such funding are expanded to cover all areas needed to deliver the scale of natural resource management. Where there is an ecosystem approach to natural resource management, funding such as RDP should be administered with respect to previously-defined ecosystem areas. Since in most cases these ecosystem areas will traverse political boundaries, the restriction of funds such as RDP to certain Unitary Authorities or wards, is not appropriate.

- Identifying financial instruments

We welcome the commitment to support markets for Payments for Ecosystem Services, and for offsetting schemes in relation to dispersed impacts. In relation to the latter, we would view cautiously any initiative to introduce a scheme of offsetting for local impacts related to the footprint of development, as this may result in adjacent communities being deprived of a biodiversity resource.

Clarification should be provided as to what is meant by 'Green Growth'.

- Review designated sites and species

Management plans for designated sites must be developed to include and integrate wider ecosystem resilience and consider their functioning within such ecosystems. In addition, existing legislation must be implemented and sites protected and appropriately managed. Further designated sites should be identified that protect the key strongholds for biodiversity upon which the wider environment is reliant. 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 in need of protection to prevent further declines in our biodiversity in Wales and to support and recover the biodiversity resource of the wider environment. At present, Sites of Importance for Nature Conservation (SINCs) provide much of the connectivity and support for statutorily designated sites, but they receive no statutory protection themselves. This should be reviewed, and SINCs given some form of statutory protection in the Environment Bill.

Any change to the level of protection afforded to a given habitat or species, or review of interpretation of the legal protection that it benefits from, should be based upon objective scientific assessment, and not, for example, on economic or political expediency.

- Monitoring and reviewing regulatory instruments

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

However, we are concerned that integrating various pieces of protected species and environmental legislation into one Act will leave the whole Act vulnerable to attack from special interest groups, who seek to undermine legislation relating to individual target species such as foxes or badgers. If this were to succeed, it could lead to weakening of the statutory protection of non-target species. Similarly, if the first test cases of the wording of any amalgamated legislation were to be unfavourable to the nature conservation side, this could set a precedent resulting in weaker protection of species or habitats which weren't the focus of the test cases.

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

Review of regulatory instruments presents an opportunity to address the widely-held view that European Protected Species legislation is focused too much on prevention of harm to individuals, and protection to their immediate breeding sites and resting places at a local scale, and not enough on ensuring ecosystem-scale favourable conservation status of populations. Present interpretation of EPS legislation results in a focus of resources upon site-by-site mitigation of impacts, and not enough upon ensuring the viability of wider populations, which would be more in line with the ecosystem approach.

- Improving the Evidence base

We welcome the undertaking to produce a State of Natural Resources Report (SoNaRR), however we are not aware of the proposed 'Information Hub' so are not able to provide comment on this. We see Local Records Centres as critical to the evidence base for natural resource management, and would there must be an

undertaking to support and engage with them. However, we recognise that the biological data set is far from complete, and welcome the stated intention to gather evidence and monitor NRP progress.

The knowledge and expertise of the network of local naturalists, biodiversity partnerships and voluntary groups should be recognised as essential components of the evidence base, even if this does not take the form of biological data in the narrowest sense. This being the case, the NRP should acknowledge and engage with this network as part of this Strategic Action.

The NRP should include a commitment to produce GIS layers of, among others:-

- Ecosystems
- Ecosystem services
- Accurate habitat mapping
- Predicted habitat connectivity
- Green Infrastructure

These should be provided with the SoNaRR, and would allow better strategic planning of ecosystem-based natural resource management

The final paragraph mentions making better use of information gathered through monitoring undertaken for the planning system. Clarification is needed, as we are unaware of what monitoring is currently taking place. Whilst we welcome the use of innovative techniques such as remote sensing, ecosystem services modelling and predictive mapping, we believe that these augment rather than replace survey and data gathering in support of natural resource management. This being the case, we are concerned at the implied intention to rely more upon 'information gathered through monitoring undertaken for the planning system' and less upon 'evidence gathering on smaller development proposals'.

- Encouraging effective communication and engagement

There is already progress in this respect being achieved through the LBAP process, and it is disappointing that this is not acknowledged in the NRP document, whilst other partnerships are mentioned.

The first paragraph should 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, and also on the benefits of ecosystem services, that the wider public may not be aware of. We should be aware of the audience and ensure we target messages and languages appropriately.

Effective communication and engagement should be a two-way process. The

opinions of the general public should be recognised and valued and incorporated into nature conservation where appropriate, rather than natural resource management imposed upon stakeholders by NRW.

Again, clarification should be provided as to what the 'Information Hub' is.

- Providing better governance to benefit nature

The supporting text discusses the refreshing of the BAP system in Wales and states that the role of local biodiversity action and the responsibilities of public authorities in the context of implementing natural resource management legislation will be 'refreshed'. Instead of a 'refresh' there should be a 'fundamental review', taking into account the diminishing resources within Local Authorities, the prospect of Local Government Reorganisation, and the requirement in the Environment Bill White Paper for an area-based approach to natural resource management. Any new approach should recognise and build on the achievements of the LBAP process over the last 20 years, and the network of skills and experience among local naturalists, biodiversity partnerships and voluntary groups.

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?

We are concerned at the bullet point: 'identify priority species or habitat that society wishes specifically to see benefit from improvements to our ecosystems'. Whilst it is vital that the wider public is involved in nature conservation, the identification of priorities should be based upon objective science-based assessments, and not on a popularity contest. Grey squirrels may be very popular with the general public, as they are often the most visible and charismatic 'wild' animals that they encounter, alongside garden birds, but it would not be appropriate to make them the focus of any conservation efforts.

There is some emphasis on delivery of the NRP by WBP and NRW, but this will only succeed if they are provided with adequate resources.

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

The proposed Strategic Actions are appropriate for the delivery of the proposed Goals, with the exception of the 'To significantly increase connectivity between protected and priority habitats' Goal. Whilst accepting that the Strategic Actions are not necessarily aligned to the specific Goals, we nonetheless believe that increasing habitat connectivity is important enough to warrant specific actions to deliver it. We suggest a Strategic Action of 'Recognising the strategic importance of increased habitat connectivity', with supporting text which refers to measures such as (but not limited to):-

- Placing habitat connectivity on a statutory basis
- Requiring consideration of habitat connectivity in agri-environment schemes
- Progressing computer models of habitat connectivity such as EcoNET and S E Wales Networked Environmental Region.

This raises the prospect of certain areas of land being protected for their connectivity value, even if they do not support a protected habitat or species. However, provided the value for connectivity had a firm basis in evidence, then legislation or policy should be able to account for this.

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

As part of a wider societal awareness-raising process, businesses should be made aware of the ecosystem services that the natural environment provides, and it should be made more explicit how they benefit from those services, as it may not immediately be obvious.

It may be the case that private enterprises should be subject to the NERC Duty to have regard to the purposes of conserving biodiversity in respect of major infrastructure projects and major developments.

Certain businesses may be well placed to use their commercial awareness to administer PES or offsetting schemes, providing these were regulated by WG/NRW.

If other Welsh Government departments e.g. transport, healthcare, economy were to better engage with the WG Nature Conservation Branch, for example by attending WBP conferences and workshops, then they may subsequently be better placed to integrate natural resource management into their relationships with the businesses that they interact with.

Businesses would normally require an incentive in the form of either financial inducement or sanction to ensure that they engage positively with natural resource management. BREEAM was supposed to deliver positive outcomes for biodiversity but the majority of 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?**

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 Local Authorities and LBAP partnerships, whilst continuing to engage via Wales Biodiversity Partnership.

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

Delivery of natural resource management should be integrated into other sector funding e.g. for regeneration or infrastructure projects. Grants for infrastructure, regeneration projects and businesses should include biodiversity requirements. WG grants for all sectors should take into account biodiversity requirements (as per NERC Duty).

**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?**

More important is that reporting on progress is accurate and properly illustrates progress, or lack of, towards goals, even if this reflects badly upon those administering the programme. We would favour longer work programmes (e.g. 5 years) with annual 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.***

The final NRP and any subsequent associated Communications Plan, Evidence Plan and Action Plan should consider carefully the audience for which it is intended, and tailor the language used accordingly. For example, we do not consider it likely that use of 'ecosystems resilience' and 'natural resource management' will be widely understood, especially if no definition is presented. The term 'Ecosystem' can be difficult to understand, define and explain in plain English even for an experienced ecologist. Therefore 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 in plain English need to be provided.

In a similar vein, a glossary should have been provided with the NRP consultation.

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

Man-made ecosystems can play a huge role in conserving biodiversity and in providing ecosystem services. Green roofs and walls where appropriate should be required via the planning system along with other simple but innovative techniques.

We are generally concerned that the plan doesn't set out anything new, and the NRP relies heavily upon the Environment Bill White Paper. We are concerned that progress on these issues continues to be slow, the decline in biological diversity and habitat condition continues.

**Ref: 0037 - Claire Baker**

The concept of a nature recovery plan is great but the information that has been provided thus far doesn't indicate just how we're going to achieve nature's recover also there is very little action included in the plan. The sentiment is good but it doesn't show the commitment to action or access to funding that will make the effective difference that nature needs.

The Welsh Governments "natural resource management" idea to propose to integrate plans and policies to join up the different ways people work across the environment in Wales, from farmers to fishermen, conservationists to construction

workers is sensible , but they are missing the point if they focus on process at the expense of action for nature in our fields, wetlands, seas and mountains. On its own, Welsh Government's "natural resource management" is not enough to 'recover' our wildlife for that strong leadership from Government is required.

There needs to be a fully funded plan of action on the ground to restore our most precious and threatened wildlife, and create space for nature in our network of special sites, and across our wider countryside and seas. Monitoring measures must be included so we can monitor whether we are meeting nature's needs and so investment in scientific evidence is essential.

Also the Environment (Wales) Bill needs to use its power to unite society to save nature. It must set long-term legally binding targets for nature's recovery, and declare it a duty of all public bodies "to further the conservation and enhancement of biodiversity" in their activities.

These measures will go a long way to giving nature recovery the power it needs to succeed.

**Ref: 0041 - Havard Prosser**

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

Yes the focus of the ambition statement is appropriate, but much more needs to be done in identifying the benefits for society. Currently biodiversity is often seen as an add-on 'nice-to-have" in the consideration of economic and social issues, whereas it is fundamental to human existence. Effective valuation of biodiversity is essential but it must be augmented by setting minimum thresholds of populations for resilience. The science around this has to develop considerably, but in the meantime a precautionary approach needs to be adopted. The decline of pollinators represents an important example worth careful study.

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

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

The analysis of key aspects to increase resilience covers the main aspect

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

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

It is on actions that the Plan is weakest. The proposed actions will be inadequate to reverse biodiversity trends because they depend heavily on process.

We need the Environment (Wales) Bill to enshrine in law long-term legally binding targets that promise to reverse declines in nature. We need the law to also declare it a duty of all public bodies “to further the conservation and enhancement of biodiversity” in their activities. This will give nature recovery the power it needs to succeed.

Whilst Natural Resource Management/Policy will integrate policies and plans to change the way people work across the environment in Wales, the current emphasis for public spending on the economy, education and health means that the process may go some way to help, but on its own it is not enough. Achieving traction to make the case for nature will be the major challenge. Reports like the “State of Nature” are important to provide influential evidence.

A fully funded nature recovery plan is required so ensure continuity of effort after the projects in the one-off Nature Fund are completed.

The RDP provides an obvious source of funding for the nature recovery plan, to fund improvements to both the designated site network and to the surrounding environment, but the RDP requires effective targeting of actions for its implementation.

Development of PES projects is welcome as a way of developing the ecosystem service approach. The DURESS project based on upland rivers in Wales provides an important source of information on quantifying the services and their values.

Improving our network of special places and most threatened and precious wildlife is essential. Good condition of these sites is considered to be an essential component of achieving resilience to change. We need Welsh Government to invest more in restoring our special sites and priority species and habitats. Our sites must be bigger, better and more connected and our threatened and precious wildlife restored. Commitment to improving these crucial nature conservation tools in the Nature Recovery Plan is essential.

Investment in scientific evidence is essential. We need to be able to see what is working and what is not – monitoring the condition of sites and trends for a full range of species and habitats is essential. This helps us see nature’s needs and ensures we are using the right tools for the job. We cannot restore the nature we have lost if we cannot see what we are doing.

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

There are good examples in retail and minerals sectors where businesses are seeing biodiversity enhancement to be part of their “licence to operate” – within society. These opportunities need to be exploited more vigorously.

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

Joint investment in landscape project such as 'Futurescape' would help in making the step from special sites to the wider environment. Collaborative effort and funding on on strengthening the evidence base e.g. monitoring is essential

**Ref: 0038 - Elinor Evans**

**Ref: 0039 - Fiona Openshaw**

**Ref: 0042 - Veronica Haines**

**Ref: 0043 - Delcie Simkin**

**Ref: 0054 - Jonathan Stone**

The diversity and richness of nature in Wales is amazing and is a constant source of joy to many. However, nature is in trouble as we are continuing to see declines in the wonderful wildlife we have in Wales including both rare and common species.

Therefore, as a supporter of the Wildlife Trusts, I am pleased that the Welsh Government is working towards a Nature Recovery Plan. However, I have some concerns that that the plan will not be as effective as it could be at halting the loss of nature and creating Living Landscapes and Living Seas.

Therefore, I would like to see:

- The intrinsic value of nature placed at the heart of the plan.
- The inclusion of a fully resourced action plan that will enable the recovery and to give greater recognition to species and habitat restoration and enhancement.
- The plan enabling the better management of our most precious sites including the Local Wildlife Site system. These sites need to be bigger, better and more connected.
- The restoration and enhancement of our seas.
- The recovery of nature to be requirement on all public bodies in Wales.

Thank you for giving me the opportunity to comment on this plan. I hope that you will consider my feedback.

**Ref: 0044 - Paul King**

You need to ensure that Natural Resources Wales comply with the plan. They currently shoot roe, red and fallow deer in line with their stated policy to prevent further range expansion of deer in Wales, effectively almost a "shoot on sight" policy for deer showing up in new areas. Whilst this policy is acceptable with alien species such as muntjac or sika deer they should be encouraging the expansion of indigenous species such as red, roe and fallow not trying to restrict it.

**Ref: 0045 - Mick Green**

I found the language and vagueness of the document made it very difficult to follow. Perhaps if you employed a few ecologists who understand what Nature is this would help developng your plan. This document does not seem to include a deliverable 'plan' but a vague idea that 'Natural Resource Management' will deliver dsomething (though not clear what this is).

The Welsh Government must develop a fully costed and detailed action plan that states clearly, with a timescale and targets, that shows how we will meet our international commitment to halt biodiversity loss by 2020 (just 5 years away) and to develop recovery of our existing much depelated Nature.

I support the RSPBs calls:

- We need a fully funded plan of action that meets nature's needs. Welsh Government thinks our wildlife will recover because a new approach called "Natural Resource Management" will integrate policies and plans to change the way people work across the environment in Wales. This process may go some way to help, but on its own it is not enough.
- Improving our network of special places and most threatened and precious wildlife is essential. We need Welsh Government to invest in restoring our special sites and priority species and habitats. Our sites must be bigger, better and more connected and our threatened and precious wildlife restored. Commitment to improving these crucial nature conservation tools in the Nature Recovery Plan is essential.
- Investment in scientific evidence is essential. We need to be able to see what's working and what's not – monitoring the condition of sites and trends for a full range of species and habitats is essential. This helps us see nature's needs and ensures we're using the right tools for the job. We can't restore the nature we've lost if we can't see what we're doing.
- Welsh Government must show strong leadership and ambition by making it law to achieve nature's recovery. We need the Environment (Wales) Bill to enshrine in law long-term legally binding targets that promise to reverse declines in nature. We need the law to also declare it a duty of all public bodies "to further the conservation and enhancement of biodiversity" in their activities. This will give

nature recovery the power it needs to succeed.

**Ref: 0046 - Newport Biodiversity Partnership**

Newport Biodiversity Partnership in its current format was formed in 2007, to bring together organisations and individuals involved in nature conservation in the area and to deliver the Newport Biodiversity Action Plan. Our members include local conservation charities, special interest groups, local recorders and volunteers. Members of the partnership carry out wildlife surveys and practical work on local nature reserves, as well as projects such as the Shrilla Carder Bee Project.

**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?**

Although we support the concept of restoring ecosystems, we do not support the idea that our reasons for conserving biodiversity are driven by society's needs.

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

The statement lacks reference to the intrinsic value of biodiversity, and the concept that we should be conserving and protecting our biodiversity, rather than exploiting it.

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

The goals are too broad and vague. There is no time limit specified, so they do not reflect the CBD goal to restore biodiversity and ecosystems by 2050, nor the EUBS goal to halt biodiversity loss by 2020. The goals generally do not correlate well to the CBD and EUBS goals.

Whilst we support the principles behind the goals, they are lacking in specific details, such as the definitions of a 'high quality environment' and 'key negative factors'. We believe that connectivity should be addressed separately from factors affecting biodiversity loss, as these many factors, such as pollution, are unrelated to connectivity.

We are concerned by the ambition for 'no net loss' of biodiversity, as this implies that biodiversity is transferrable. Given the current state of our ecosystems, it would be more appropriate to focus on delivering biodiversity gains.

In addition to the stated goals, we would like to see additional focus on biodiversity beyond statutory protected sites. Our Local Nature Reserves, SINCS, Wildlife Sites, and our hedges, farmland, woodlands, parks, gardens and ponds all have their part

to play in allowing biodiversity to flourish. They need conservation action to protect and manage them, maximising the opportunities for wildlife so that they can contribute to healthy ecosystems.

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

We are concerned that the 'focus for action' does not include action 'on the ground'. As such, it is difficult for us as a partnership to see how we can be involved in the delivery of the plan. We are also concerned that setting conservation priorities according to public opinion is not scientific, and will not result in resilience across the whole ecosystem.

Putting in place effective natural resource management – This is a new concept, and it is still not very clear as to what natural resource management actually means in practice. It is also not clear as to whether this action is to be carried out exclusively by Natural Resources Wales or whether other parties are involved. It is also unclear how the National Natural Resource Policy relates to this plan.

Delivering a Welsh National Marine Plan (WNMP) - We support the production of a Welsh National Marine Plan, but it should be closely integrated with this plan, as management of terrestrial resources affects the marine environment, and vice versa.

Facilitating Cross – sector policy integration - We welcome commitment to cross-sector policy integration, and strengthening of the NERC duty. In order to be successful, the Welsh Government needs to take responsibility for delivering the CBD and EUBS goals, and obligations and targets to promote biodiversity recovery need to be placed on all government departments, local authorities and government bodies.

Funding our partners - Without appropriate resources, this plan will never succeed. Within local authorities, we are seeing falling numbers of ecologists and LBAP officers, and expecting more if the proposed mergers take place, at a time when they are needed most. Local authority officers are needed to uphold and support the NERC duty, to deliver planning and statutory obligations towards biodiversity, and to support LBAP partnerships, to name but a few important functions. These posts need ongoing funding.

In addition, NRW and other government departments and organisations, and the Welsh Biodiversity Partnership, will require dedicated ongoing funding to deliver this plan.

Regarding the Nature Fund, we are unable to comment on its effectiveness, as disappointingly, Newport was not within any of the action areas. This is despite being identified as a Futurescape and Living Landscape by the RSPB and Wildlife Trusts, and being identified as an important area for networked environment regions in the Wales Spatial Plan. We understand from partners in other areas that although

the funding was welcomed, the application process and timing was not conducive to effective conservation action.

Identifying financial instruments – whilst we support the principle of seeking and identifying new sources of funding for biodiversity, we are concerned that many businesses do not recognise the benefits of investing in biodiversity, and so this cannot yet be relied on as a source of income. Additionally, this may cause conservation to be driven by ‘product’ rather than need.

Reviewing designated sites and species; Monitoring and reviewing regulatory instruments – Whilst we welcome review, these should aim to make current protection more effective, and not become an effort to remove ‘red tape’ or other perceived barriers to development.

Improving the Evidence base: Research, Monitoring and Surveillance

Whilst there is a clear need to improve our biological evidence base, there is no commitment other than stating what NRW ‘could’ include within SoNaRR. There is no mention of the role that Local Records Centres could play, and no commitment to funding vital conservation research.

We would like to see commitment to researching and investigating the reasons why so many of our current conservation efforts are failing. Why did the Welsh Government fail to halt biodiversity loss by 2010? Why are agri-environment schemes failing to halt declines in farmland species? Why are only 32% of SSSIs in favourable condition?

Encouraging effective Communication and Engagement:

This goal appears to commit to very little, other than stating that opportunities exist for promoting biodiversity. At the local level, partners are already working together and communicating effectively, although this may suffer if local authority cuts continue. We would like to see commitment to biodiversity made obligatory within the forthcoming well-being plans.

Providing better Governance to benefit nature

We are concerned as to what is meant by ‘refreshing’ the Wales Biodiversity Partnership and local biodiversity action. It is worrying that our role in the future of Welsh conservation is not clear, and that this appears to be a top-down dictatorial approach rather than supporting the grass roots action that local partnerships generate.

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

We would like to see commitment to action ‘on the ground’ and commitment to supporting the work of local authority officers, local records centres and local

biodiversity partnerships.

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

Local businesses can support conservation work if they are engaged and informed of the benefits. In Newport, the Eastman Chemical Company supports the work of the Biodiversity Partnership through leasing part of their land to the Gwent Wildlife Trust as a nature reserve. Funding from Eastman has enabled training of volunteers and management of the reserve, which provides positive PR for the company and volunteering opportunities for employees. Examples like this should be promoted to other businesses.

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

We are disappointed that the Nature Recovery Plan fails to acknowledge the role and contribution that LBAP Partnerships can make, and have made so far. Local partnerships have the knowledge and experience needed to deliver positive biodiversity action. It is our experience that the best nature conservation is generated by responding to local needs, rather than government targets. Therefore, the best way that the Welsh Government can work with us is to listen to our concerns, and provide effective communication and resources to support our work.

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

See question 7.

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

There is no mention of BARS, or any other system for reporting biodiversity action, so it is unclear how different organisations and partners will communicate and avoid duplication. It is important that different systems for funding and regulation are integrated and avoid conflict – a recent example being a Glastir grant that contravened a SSSI management plan. Different government departments and organisations need to communicate and work together effectively.

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

We have no knowledge of the Information Hub, so we are unable to comment.

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

No comment.

**12. We have asked a number of specific questions. Please let us know if**

***you think there are related issues which we have not specifically addressed, and provide further information.***

We would like to reiterate our disappointment that LBAP partnerships and the role they can play are barely mentioned. It is not clear who this plan is for, who will take responsibility for delivering the actions, and how the strategic actions will translate into action on the ground. It is also unclear who will be held to account if we continue to fail to meet our CBD commitments. Without commitment to resourcing actions and clear lines of responsibility this plan, as previous plans, is doomed to failure.

**Ref: 0047 - Kenneth Simkin**

I welcome the Welsh Government's commitment to forming a coherent Nature Recovery Plan. This is long overdue and needs implementation as soon as possible.

Therefore, as a supporter of the Wildlife Trusts, I have some concerns that the plan will not be as effective as it could be at halting the loss of nature and creating Living Landscapes and Living Seas.

Therefore, I would like to see:

- The plan take on board the concept of valuing nature for nature's sake, not simply considering its worth to human society. Putting a price on all natural resources can be counter-productive. E.g. if an area of woodland is deemed to have a value of £100 million and a new road is worth £150million to the economy the wood will get the chop - literally – should the road be routed through the wood.
- A cost calculated on the impact of human development on ecosystems services. The negative impacts must be accounted for in the planning process. What of the negative impact on ecosystems services of the above mentioned road?

The inclusion of a fully resourced action plan that will enable the recovery and to give greater recognition to species and habitat restoration and enhancement.

- The plan enabling the better management of our most precious sites including the Local Wildlife Site system. These sites need to be bigger, better and more connected.
- The restoration and enhancement of our seas.
- The recovery of nature to be requirement on all public bodies in Wales.

Finally, in a system where a price is put on everything, what of a possible future benefit of a species/biological system as yet unknown. How can a financial value be put on this? Thank you for giving me the opportunity to comment on this plan. I

hope that you will consider my feedback.

**Ref: 0048 - Carmarthenshire Biodiversity Partnership**

These comments have been put together by the Carmarthenshire LBAP partnership, as a result of a specific meeting to discuss the NRP held on 20th November 2014 which was attended by a number of the partners (see below) . These comments should be considered as officer comments.

Llanelli Naturalists and BSBI

Wildlife trust of South and West Wales

National Botanic Garden - Wales

Natural Resources Wales,

Carmarthenshire County Council and LBAP officer

Main points:

- The Carmarthenshire LBAP partnership urges the Welsh Government to adopt the vision statement for the CBD's Strategic plan for Biodiversity 2012-2020 see p 10 of the NRP.
- Carmarthenshire LBAP urges the Welsh Government (WG) to adopt verbatim the five strategic Aichi goals as these are clearly expressed rather than those presented in the NRP. This approach then gives WG the opportunity to adopt and develop the 20 Aichi targets as part of a future Action Plan. It is considered that the Aichi strategic goals describe more comprehensively what is required in Wales, whereas the origins and justifications for goals in the NRP are unclear.
- The NRP has to be inclusive and engage with all other WG departments, businesses, and other agencies concerned with the management of natural resources. IT need to demonstrate "joined up thinking". We are concerned by the apparent lack of integration with agricultural policies.

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 vision for the CBD's strategic plan as set out on p.10 of the NRP is more comprehensive and is far clearer and easier to understand than the ambition statement proposed by the NRP. It is suggested that this should replace the NRP ambition statement. The focus of the NRP ambition statement is narrower than it

need be, and the focus of the NRP ambition statement does not examine the causes of biodiversity decline, nor its intrinsic value. In addition the NRP ambition statement uses terms such as “building resilience of our ecosystems” which is not widely understood, and nor is it defined within the document.

As a society we have a duty to also conserve our natural environment for its intrinsic value. The requirement to conserve Nature for its intrinsic value needs to be clearly embedded within the ambition as well as conservation for the benefits to society. We consider this to be lacking at present.

We suggest that the ambition statement should be more in line with the NERC Duty, the Aichi Biodiversity Targets and EU Biodiversity targets where, as well as reversing declines, enhancing biodiversity is key.

The new EU Biodiversity Strategy adopted in May 2011 by the European Commission aims to halt the loss of biodiversity and ecosystem services in the EU by 2020, in line with the commitments revised of the CBD held in Nagoya.

The EU Biodiversity Strategy adopted in May 2011 by the European Commission aims to halt the loss of biodiversity and ecosystem services in the EU by 2020, in line with the commitments revised of the CBD held in Nagoya.

This strategy highlights the intrinsic value of biodiversity and has contains six targets and 20 actions. The six targets are summarised as:

- Full implementation of EU nature legislation to protect biodiversity
- Better protection for ecosystems, and more use of green infrastructure
- More sustainable agriculture and forestry
- Better management of fish stocks
- Tighter controls on invasive alien species
- A bigger EU contribution to averting global biodiversity loss

The focus of these targets is clear for all who may read them and at least address the causes of the biodiversity loss, which the NRP does not address in sufficient depth. We also support adopting of the five Aichi Biodiversity Targets, see below.

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

It is considered that the ambition statement in the NRP is unclear and is open to misinterpretation. WG are urged to use the vision statement for the CBD’s Strategic plan for Biodiversity 2012-2020 see p 10, and to consider replacing “sustaining a healthy planet” with “a healthy country” if preferred. The CBD’s vision statement is

clear and uses a language that is more straight forward than that in the NRP ambition statement. Is there anything in the CBD vision statement that WG would not want to sign up to?

It is noted that the ambition statement in the NRP does not reflect the title of the document. Terms such as “building resilience of our ecosystems” and “focusing on effective natural resource management” are unlikely to be widely understood, hence our preference for the clearly stated CBD vision.

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

Carmarthenshire LBAP urges the Welsh Government (WG) to adopt verbatim the five strategic Aichi goals as these are clearly expressed rather than those presented in the NRP. This approach then gives WG the opportunity to adopt and develop the 20 Aichi targets as part of a future Action Plan. It is considered that the Aichi strategic goals describe more comprehensively what is required in Wales, whereas the origins and justifications for goals in the NRP are unclear. It is suggested that WG would be setting out a strong position statement on biodiversity if it adopted the internationally recognised Aichi goals. Is there any reason not to adopt the Aichi goals?

CBD Strategic Plan for Biodiversity 2011-2020 - Strategic Goal A : Address the underlying causes of biodiversity loss.... this is not adequately covered by the goals set out on p 14 and 15 of the NRP. Achieving no net loss of biodiversity does not equate to understanding the underlying causes of loss as suggested on p15 of the NRP. No net loss is also hard to evidence, for example the contribution a habitat makes to biodiversity is more than that of its extent: it reflects its condition, location, and juxtaposition with other habitats, much of which cannot be quantified. We endorse the need to mainstream biodiversity across government and society, and suggest that this requires more than just achieving no net loss of biodiversity (if indeed this can be achieved given the current land use policies that apply to agriculture development, forestry and fisheries in Wales), and we would welcome an approach that addresses the enhancing of biodiversity.

CBD Strategic Plan for Biodiversity 2011-2020 Strategic Goal B : Reduce the direct pressures on biodiversity... this is partly addressed by the second goal on p14 but this goal on the NRP focuses on building connectivity and resilience rather than the factors that cause the loss. It is crucial to address factors resulting in loss, and this could be done by means of mainstreaming biodiversity across government and society, see above. It is suggested that WG consider exactly how they will develop ecosystem connectivity and build ecosystem resilience – What effective mechanisms would be used to achieve these objectives over significant and integrated areas, and is it feasible to use these, and how would one assess when this goal had been achieved?

The significant impacts of farming, forestry, climate change and development on biodiversity loss and the ability to build resilience must be considered in the NRP if the plan has an ambition to reverse the declines in biodiversity. These are policy areas that must integrate with the ambitions and implementation of this of this plan and it must be clearly evidenced how this will be carried out. There is past evidence of agri-environment schemes permitted activities, e.g. hedge cutting that adversely affect S42 species (Brown Hairstreak butterfly) and this appears to be continuing, – e.g. bracken cutting as part of Glastir where there are High Brown Fritillary populations. This is evidence of a lack of understanding of the factors causing biodiversity loss, and the fact that biodiversity is not mainstream within other disciplines that can have an effect on it. It also highlights the inadequate communication between biodiversity and agricultural policy makers.

CBD Strategic Plan for Biodiversity 2011-2020 Strategic Goal C: To improve the status of biodiversity by safeguarding ecosystems, species and genetic diversity. The NRP does refer to management of our highest quality environments, increasing connectivity and achieving no net loss of biodiversity, but this does not adequately reflect the more holistic approach of Aichi Goal C across the wider countryside and urban areas. No net loss suggests an acceptance of some loss together with some form of compensation. Connectivity is hard to explain and quantify. The wording of the Aichi goal is preferred.

CBD Strategic Plan for Biodiversity 2011-2020 Strategic Goal D: Enhance benefits to all from biodiversity and ecosystem services – this goal is not covered by the NRP goals on p14 and 15. Development of this goal would allow the intrinsic value of biodiversity to be considered.

CBD Strategic Plan for Biodiversity 2011-2020 Strategic Goal E: Enhance implementation through participatory planning, knowledge management and capacity building this is covered to some extent by the final goal in the NRP.

Regarding the goals proposed in the NRP:

Goal: 'To improve degraded habitats at scale'

To improve degraded habitats at scale – this is open to a range of interpretation, namely what constitutes degraded? How do you measure improvement of a degraded habitat?

- The first sentence reads 'We have a large extent of degraded or less diverse habitats'. This is a significant statement and should be clarified. There is no reference to the data that supports this statement. Within each area of Wales local knowledge may provide information that challenges this view, changing the perception/understanding of the local environment within a national context. Sometimes less diverse habitats can still be important.

- Page ii of the consultation document in summarising the document says “restore” and page 14 says “improve”, these are very different.
  - There is no discussion of the scale this goal is to be addressed and how they could be delivered. At a large scale numerous landowners of land under various land uses will be involved. They are likely to be partnership projects that need a strong lead that has the capacity to take on this level of work with clearly identified resources. The voluntary sector (Wildlife Trusts, RSPB) has undertaken successful landscape-scale projects but are reliant of external funding and the pressures and time limitations that this brings with it. Projects at such a scale need to be long term (not 3–5 years but 15–20 years) with funding assured and, with objectives that are based on a vision of an evolving landscape rather than a snapshot. Projects at this scale will require the consideration of different regulatory regimes and landowners’ interests.
  - It must not be forgotten that small-scale habitat restoration can be important at a local level, contributing to connectivity, improved environmental quality for local communities and locally important habitat and species.
  - We feel that this goal should be amended to: To restore the condition of degraded habitats at an appropriate landscape scale.
  - How LBAPs can/have contributed to this goal in Carmarthenshire:
    - The WTSWW lead in a landscape scale partnership project to manage and restore marshy grassland in the Gwendraeth Grasslands projects.
    - The RSPB have the Three Rivers Futurescapes project in the county.
    - Local Biodiversity Action Plan Partnerships are ‘knowledge networks’ with extensive know-how, experience, connections, capacity, continuity and common purpose that could contribute to action contributing to this goal.
  - How Local Authorities can contribute:
    - Carmarthenshire’s Mynydd Mawr Marsh Fritillary Project is an innovative project that contributes to this goal
    - through management of Council-owned landholdings, farms and management of collaborative projects, e.g. Carmarthenshire Bogs Project.
- Goal: ‘To address key negative factors of biodiversity loss and increase connectivity significantly’
- We felt ( if we have interpreted it correctly) that the phrase ‘To address key negative factors of biodiversity loss’ would be better expressed as 'To understand and address the key causes of biodiversity loss' [we feel that the word negative is

unnecessary because are there positive factors of biodiversity loss?].

- There should be more explicit text on the root causes of biodiversity loss – see earlier comments. Factors such as eutrophication and pollutant emission are the results of action that cause negative impacts and not root causes themselves. These are not referred to and should be addressed: agriculture, development, marine activities, forestry, etc.

Before we can address negative factors we need to understand what they are and how they operate to adversely affect biodiversity. While connectivity is a useful concept, it is difficult to define in any empirical way, and we do not appear to have a robust way of measuring it, so it poses problems as a goal or target.

- A new goal should then be created focusing on the second half of the statement: 'To maintain existing connectivity and significantly increase habitat networks'. We feel that existing connectivity should be recognised and strongly protected, in addition to increasing connectivity where it is lacking. The associated text on connectivity should also be placed under the separated goal.
- We would assume that actions that will have considered the causes of biodiversity loss will be part of any costed action plan resulting from the Nature Recovery Plan.
- We feel that this goal should be amended by dividing into two goals:  
'To understand and address the key causes of biodiversity loss'  
'To maintain existing connectivity and significantly increase habitat networks'
- More consideration needs to be given on what actually are the factors of biodiversity loss.
- How LBAPs can contribute to (i) understanding biodiversity loss and (ii) looking at connectivity:
  - Local ecological expertise (i and ii)
  - Volunteer base for survey and monitoring - county recorders, NGO volunteers, e.g. in Carmarthenshire Butterfly Conservation volunteers have significantly contributed to the conservation of the Brown hairstreak butterfly on site.(i)
  - The BSBI have annual recording weeks in the county.
  - Community engagement –citizen science (i)
  - Projects that link into academic institutes, e.g. Carms Bogs project has resulted in two PhD that will work on the project sites. (ii)
- Local Record Centres

- How Local Authorities can contribute:

- Coed Cymru work (ii)

- Planning and LDP processes (ii)

- Green Infrastructure planning (ii)

- SINC network (ii)

- Carmarthenshire's Mynydd Mawr Marsh Fritillary Project – landscape-scale project to manage marshy grassland habitat. Funded through planning contributions.

Goal: 'To improve management of our highest quality environments'

- What does WG mean by 'highest quality environments'? We assume at the very least it includes protected sites (SACs/SPAs,SSSIs), but the accompanying text is slightly ambiguous. Designated sites are/should be protected under existing legislation, so this goal should be more ambitious. We feel strongly that this should include important habitats that may be on unprotected sites (e.g. SINC) – as previously stated it must be remembered that SSSIs are just examples (and not always the best examples) of habitat types.

- 'Priority areas' are mentioned here. Where and what are these? Are they linked to the proposed Area Statements? Are they the areas decided upon by the WBP Ecosystem groups? If not who decides where they are?. Will there be consultation with local LBAPs that have the knowledge to help contribute to their designation?. There is lack of clarity here.

- The mechanisms to achieve connectivity between these 'highest quality environments' should be addressed – on a large scale is this complex and will involve multiple landowners.

To improve management of our highest quality environments suggests a selective approach to habitat management. This goal when read with the para. on p 8, which refers to protected areas raises considerable concerns regarding the NRP' 's view of the wider countryside in terms of its capacity to provide for biodiversity.

Goal: To achieve 'no net loss' of biodiversity

- What does 'no net loss' actually mean here? Surely it is just not possible when considered in the light of the definition of what biodiversity actually is?

- How will 'no net loss of biodiversity' be monitored? A planning site, for example, may have 20 key species which may then be lost and mitigated/compensated for with a scheme that includes 21 species that do not reflect the habitat lost. This results in no net loss but inadequate mitigation. What can we learn from the failure to do this successfully at the moment? Effective, manageable monitoring systems

should be put in place, resourced and required to be delivered.

- Delivery of this goal is largely considered to be through cross-sector integration and awareness raising. As these have evidently not been entirely successful in the past, it is imperative that any new approach ensure that past failures are not repeated.

- Within the planning system the target of 'no net loss' is not possible. Any application that impacts on area of habitat, whatever the quality will result in some loss of biodiversity, even agricultural land. Brownfield sites are hard to defend as they are often key development sites within local plans and mitigation/compensation is hard to achieve. Land is often contaminated making on site mitigation difficult and creation of suitable brownfield habitat close by hard. Developers and Local Planning Authorities need to be innovative to explore the possibilities of suitable mitigation but this can be time consuming and expensive and require long-term maintenance, which often falls by the wayside. The economic benefits of development have generally been prioritised, being an easy concept to grasp in local decision making with the benefits/opportunities of conservation/enhancement of biodiversity being avoided/overlooked. There are few comebacks for non-delivery or non-compliance and the perceived 'constraints' of fully integrating biodiversity do little to encourage other sectors to incorporate it.

- Biodiversity MUST be integrated into decision-making and this has been a duty for all public bodies for some time. Local government ecologists and biodiversity officers have been working hard for many years to address this and officers have made progress in working with departments in addressing these issues. Often, however, biodiversity is still seen as a constraint rather than an asset or opportunity, both within the way Local Government considers its property and carries out its services. LG ecologists have been working from the bottom up often without advocates or adequate understanding at a senior level to make significant changes. A significant culture change is needed to integrate biodiversity considerations through Local Government services and this must also come from the top down, from WG to ensure there is a clear understanding of the issues, requirements and engagement by public bodies. There has been a failure to engage effectively on the NERC requirements and this must be addressed through this Plan.

In addition – WG must consider this goal in the light of the impacts of other the actions/policies of other WG departments: agriculture, economy/growth, transport/infrastructure, grant funding, etc.

Why is the NERC duty only applicable to Public Bodies - how could it or a form of it be extended to other areas, e.g. business, agriculture, which have significant impacts?

- This goal should be brought in line with the current EU consultation on the EU No

Net Loss (NNL) Initiative. Its summary includes issues that might be addressed through the NNL Initiative (p.16), which could inform the Nature Recovery Plan including:

– the need, at planning and project stages, to avoid and, where avoidance is not feasible on the basis of informed evaluation with careful scrutiny, to reduce and compensate (including, where appropriate, through offsetting) for significant residual impacts on biodiversity and ecosystem services arising from all plans, projects and activities (of housing, transport and energy infrastructure, industrial development, extractive industries, major land use changes, etc. – not necessarily limited to those plans and projects within the scope of the EIA and SEA Directives).

– consideration of how compensation might also, while respecting the principles of functionality (like-for-like) and ‘additionality’, enhance the conservation status of protected habitats and species and the ecological cohesion of the Natura 2000 network (above-and-beyond the legal obligation to do so).

– address causes of net loss of biodiversity arising from agriculture, forestry and fisheries, in order to tackle these other key drivers of biodiversity loss and assure a level playing field across sectors.

– give due consideration to the relative advantages and disadvantages of voluntary as opposed to mandatory approaches to the mitigation hierarchy including compensation and offsetting, with due attention to the relative competences of the EU and Member States (e.g. with respect to territorial and developmental planning).

• Societal awareness. Everyone working in the environment in Wales has this as a main objective. We consider the language and links that need to be made to the range of groups that we work with from schools, communities, developers, colleagues, councillors and land managers. We also listen to the range of ways people perceive and relate to their natural environment, which is many and varied. The language of biodiversity, natural assets, natural resource management, ecosystems services, etc. can be confusing and alienating. Many people are aware of the importance of nature/biodiversity and do appreciate it and many do try and do something on a local scale to support it. Conversely awareness not always result in action.

• We feel that this goal should be defined more clearly.

• We would like more information on how monitoring of net loss will be achieved

• We feel that consideration should be given to in the Plan to the EU No Net Loss (NNL) Initiative which considers the issues related to no net loss.

• We feel that a focused actions should come from this that consider how no net loss will be addressed across all sectors that impact on biodiversity.

- How LBAPs can contribute:

- LBAP Partnerships are an exemplar of the range of ways that raising awareness is carried out.

- Continue with raising awareness , and sharing and developing best practice

- How Local Authorities can contribute:

- Engagement with mainstreaming biodiversity throughout the Authority

- Skills to increase knowledge understanding with public, officers, councillors, community councils and schools.

- Favourable management of publically owned land.

- Adequate mitigation/compensation/enhancement via planning system

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

- The lack of integration across sectors and within WG has been a reason why biodiversity continues to be lost/degraded.

Any framework of governance must address the fact that to be effective it must be adequately resourced and clearly embedded into the delivery of services by public bodies. Therefore we suggest that the goal be amended as set out below.

- With the decline in public funding and the loss of staff and expertise at key institutions can we effectively continue to strengthen our collective database?.

Also see comments on Action: Facilitating cross-sector policy integration below.

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

Carmarthenshire LBAP feel strongly that the NRP should include wording that reflects the intrinsic value of biodiversity, the need to take steps to enhance biodiversity, to integrate natural resource management across all sectors and to need to continue to seek to understand why biodiversity is declining. This reflects the requirement of all public bodies under the NERC duty 2006. Some partners suggest that the NERC duties should be extended into business and that evidence of compliance with NERC by public bodies should be clearly evidenced, across their operations, which would assist in mainstreaming biodiversity across society.

Additional goals

An additional goal should be included that relates to a costed and appropriately funded action plan to deliver the goals. Without this any plan become unviable.

The biodiversity sector, especially in relation to public and voluntary bodies, is poorly resourced in comparison to other sectors. Conservation organisations and LAs have very few ecological staff in relation to the scope of work required and funding pressure means that these are being reduced.

The voluntary sector is largely dependent upon external funding, working hard to apply for funding to employ staff and undertake the important management that has been discussed in this Plan. NGOs and public bodies who deliver biodiversity should be treated as equal partner in delivering our shared ambition and adequately and consistently funded.

Often the delivery of on the ground action to reverse the trend of biodiversity decline will be reliant upon public bodies and conservation charities. 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 reliable resources from WG.

Funding for the delivery of this plan could be sourced in part by the sectors that are causing the losses: agriculture, development, etc. through the 'polluter pays' principle, better use of contributions through planning.

We therefore recommend the addition of a goal: To produce an appropriately costed action plan to deliver the goals of the Nature recovery

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

As suggested above it is appropriate that the WG adopt the five Aichi strategic goals and in time the 20 Aichi targets, and that these should form the basis of a Nature Recovery Action Plan that will set out how the WG and its partners will deliver the five strategic goals. In this way Wales will demonstrate its commitment to achieving the CBD's Strategic Plan for Biodiversity 2011-2020. There seems little point in diluting the clear vision set out in the CBD plan, or only addressing a proportion of that vision.

On the 'Focus for action' (p.16) within the NRP we have the following comments:

Action focused on monitoring and surveillance

It states here that focus for action should include 'priority species or habitats that SOCIETY wishes specifically to see benefit...' Firstly action should be based on evidence provided by science. Some of the most important species to conserve and enhance may be the least appealing to the public. We must of course listen to people and there may be opportunities undertaken action based on preferences expressed if appropriate.

Action focused on safeguarding species habitats and ecosystems

At present there is no legal protection for the majority of the S42 Habitats and Species – those that are considered to be priorities in Wales. (The Hedgerow Regulations 1997 and the EIA Regs for semi- natural and cultivated land do prevent some losses but do not apply to all situations). Experience shows that there is an increasing tendency only to do what is a legal requirement, so at present the fate of our priority species and habitats is based largely on goodwill as the majority are not protected by legislation. WG are urged to provide appropriate legal protection for S42 habitats and species.

WG, Local Authorities and other organisations should provide clearer information on biodiversity loss which results from their actions.

Strategic actions (p.17)

Action: Putting in place effective natural resource management

- The strategic action to put in place natural resource management) (p.17) should start with a clear definition for what this might be, and this might include a risk-based, and more pro-active approach to securing the favourable conservation status of key species and habitats. We cannot comment on this approach unless it is defined.
- In relation to the Environment Bill, NRW will be required to publish area statements (definition required), 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 requirement and legal obligations are likely to be delivered upon, any ambiguity in language should therefore be avoided.
- In relation to the NRW area statements (definition required), clarification should be provided as to how these area statements will fit with existing land-use policy, such as LDPs?
- In the final paragraph it states that ' NRW and WG will wherever practically possible endeavour to demonstrate best practice in implementing effective natural resource management on their own estates'. It should be mandatory for WG and NRW to carry out best practice on their estates, not wherever possible...

Action: Facilitating cross-sector policy integration

- Natural Resource Management should surely more than just indirectly influence

economic development but be a key factor in the sustainable economic development in Wales. The needs and values of biodiversity should be key in all decision making, this approach is reflected in the Aichi Strategic Goal A ...biodiversity needs to be made mainstream across government and society.

- The text states that 'it is important to strengthen the implementation of the NERC biodiversity duty'. It is the enforcement of this duty that needs to be strengthened and it is not clear how this will be achieved. Just how the duty 'could be' strengthened by links with the Environment Bill or Future Generations Bill, is not clear within this Plan and clarification on how these pieces of legislation will strengthen the duty would be useful.

- Reference is made to the LDP process - this a bit late really as most Local Authorities have either completed them or well on the way to doing so.

- WG must lead by example in cross sector policy integration – failure to do so in the past has contributed to some of the problems that we are dealing with today. For example agricultural policy needs to be closely linked with the protection of S42 habitats and species and deliver positive outcomes for these. How does Glastir fit into this section? - It is not mentioned and reflects a serious omission in that agriculture is barely mentioned within this document, but it has a major impact on land use and biodiversity in Wales. It is noted that within WG ministerial responsibility for natural resources does not sit with agriculture - these two disciplines need to be brought together if NRM is to have any impact in Wales

- The sequence of policy development means that there could be a lag between finalising this Plan and the other linked Bills. It is important that the links are not lost and that any timing gaps do not mean that decisions can be made that are detrimental to the ambition and goals of the Nature Recovery Plan.

- How LBAPs can contribute:

See below

- How Local Authorities can contribute:

CCC's LBAP officer works with all CCC departments to identify working practices that have an impact on biodiversity and seeks to find ways of safeguarding biodiversity, reducing negative impacts and identifying opportunities for enhancements. LAs need to be encouraged by WG to demonstrate through positive action their commitment to implementing the NERC Act

Action: Funding partners

- The requirement for considering biodiversity - both impacts and opportunities to enhance - should be integrated into ALL grants funding by WG - the grant funding of external wall insulation is a key example – one which has led to the loss of bat

roosts.

- Longer term funding is vital for sustainable biodiversity outcome for any grant funding – perhaps over decades. This should include project development which is often expensive and time consuming. Flexibility needs to be inbuilt into funding provision so that adaptation of projects to new information can be allowed. Recent funds have had very short deadlines for application and delivery and it is very hard to deliver effective long-term outcomes when planning and delivery has such short timescales. It is also hard to build effective partnership projects based on such short timescales. The recent Nature Fund should not be considered as an appropriate model for funding biodiversity action.

- Given the stresses that some Local Authorities are under appropriate funding is vital to ensure that a key delivery partner can deliver the desired outcomes. A good example is the improvement of ‘management of public sector land for nature’. Ongoing budget cuts mean that this is not necessarily easy to achieve: considerable loss of staff and lack of key equipment means that even basic adjustments to management to enhance land for biodiversity may not be possible. Increasingly if there is no statutory requirement to deliver anything for biodiversity then it is unlikely that any change or action will result, especially if there is no effective enforcement. This relates back to comments on the NERC act see above - LAs need to be encouraged by WG to demonstrate through positive action their commitment to implementing the NERC Act

- There are a number of funding streams not included under this action including 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?

- Clarification should be provided in relation to what ‘nature outcomes’ are defined as. The expansion of the RDP to cover all of Wales should be considered so that it can be used for ‘integration of nature’ across the whole of the country. Local experience has demonstrated how RDP funded projects can completely overlook opportunities for biodiversity enhancement.

- Partner funding linking on the ground action and associated academic research should be targeted to that links between delivery, research and monitoring can be established.

- How LBAPs can contribute:

Through the development of long-term funding programmes, partner projects can be properly planned and implemented that will likely have long-term positive results for the environment .

- How Local Authorities can contribute:

- Develop 3-5 year working plans for biodiversity action that NRW feel able to support

- Raise awareness among other grant recipients within in LA of opportunities for biodiversity enhancement, e.g. Economic Development

Action: Identifying financial instruments

- The first paragraph, in particular, is very hard to understand. It states that 'it is vital that action that will strengthen the resilience of our ecosystems is attractive to investors'. What happens if the key action required that will strengthen the resilience of our ecosystems is not attractive to investors? Is the action required compromised in favour of investment and to the detriment of our ecosystems?

- Financial instruments should target the plan's priorities

- What are Green Growth proposals – a definition is required?

- The third paragraph talks about schemes to offset dispersed impacts from development plans. Any such scheme must be specific to the identified habitat impacted upon and local to the impact area. Offsetting is controversial and must be carefully planned and is not always appropriate. It must be shown to be the only viable way in each instance 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.

- As well as financial incentives the NRP should review the monitoring of enforcement of legislation and regulations. Strict enforcement of regulations and legislations works as a deterrent to intentional breaches. The allocation of resources for ensuring compliance with agricultural and forestry regulations should be reviewed, these are considered to be inadequate at present.

Action: Reviewing designated sites and species

- See previous comments.

- We emphasise the importance of designated sites and the need for them to be properly managed. Local sites (SINCs) are also very important as these will include the whole suite of the S42/BAP habitats in the county, not just the best examples designated as SSSIs. In fact SINCs may be better examples than some SSSIs and this should be recognised through the planning process.

- More sites should be designated and safeguarded as previously discussed. Appropriate funding for management must accompany this process.

- It is understood that under the LIFE/Natura 200 programme SACs and SPAs in Wales will have 'Priority Improvement Plans' with identified priority costed actions to get features into favourable conservation status. This links to the Nature Recovery Plan and the approach of costed actions should be adopted throughout this plan.

Action: Monitoring and reviewing regulatory instruments

- In the first sentence it states that the Environment Bill will provide NRW with opportunities to take a more integrated approach to how they deliver their operational activities. This integrated approach should be clearly defined and laid out for scrutiny to ensure that the Plan's goals are helped to be realised via their operational activities and also details provided of how this will be monitored. There have been conflicts in the past.
- The monitoring element of this action is not discussed but through monitoring there should be a mechanism to amend regulatory instruments when needed.

Action: Improving the evidence base: research, monitoring and surveillance

- Monitoring takes resources and expertise. This again emphasises the importance of having a targeted and costed plan and the end of this process.
- Improving the evidence base is important but is the commitment and funding to do this?

CCW's Phase 1 survey is about 20 years out of date, and there would appear to be no commitment to repeat this. Work Environment Systems (Aberystwyth) has done with remote sensing for NRW with a view to updating Phase 1 has not been released, and the recent application from for JWP funding has specifically excluded monitoring. Yet monitoring is crucial if one is to observe and interpret change, for better or worse. You cannot reverse a decline if you do not know what is declining and how fast, and you can only conclude that you have achieved the objective when the monitoring tells you so. Properly funded monitoring, carried out to the required standard is crucial for any evidence based discipline.

- Universities, NRW habitats and species experts, and other academic institutions are vital in the contribution they can/should make to research, monitoring and surveillance and the interpretation of data. Again funding is vital to ensure they can deliver the service they are capable of offering – at the moment these organisations are losing expertise and we cannot afford to let this continue. Universities in Wales also need to demonstrate that they are producing graduates with an ability for field biology. The majority of recording work is carried out by an ageing population of volunteer recorders and over the years these will need replacing, and they need to be supporting by a network of records centres that enjoy some security of funding
- The use of the network of Local Record Centres to improve the evidence base is

not discussed. This underfunded resource could be a vital in future. They and county recorders hold a vast amount of data which could be mobilised to support research and monitoring.

- Will the mentioned State of Natural Resources Report be consulted upon?
- The conservation and enhancement of our soils in all our habitats is vital and should be a priority in any research as well as the contribution of lower plants, fungi and lichen to ecosystem service provision. These are neglected areas.
- What is the Information Hub?!
- With reference to the planning system we are not aware of any effective monitoring that is currently undertaken. This is resource heavy and given the delays in implementation after approval cannot be done easily or quickly. LDPs are required to monitor so that may be a way to gather some information.
- Re the last sentence in the final paragraph of this section does this mean that there will no longer be a requirement for ecological information to be provided with a planning application for smaller developments? We could not support this.
- How LBAPs can contribute:
  - Identifying gaps in knowledge and evidence, supporting and providing continuity for monitoring where resources allow
- How Local Authorities can contribute:
  - Ensuring that decisions regarding biodiversity are based on sound evidence

Action: Encouraging effective communication and engagement

- Understanding rather than enthusiasm should be the primary aim of the need to communicate the value of biodiversity and its intrinsic value. If we can enthuse as well, all the better.
- Engage with partners as equals, ensuring all have an equal voice and there are no barriers relating to status.
- Ensure Glastir consults with local biodiversity projects to ensure that duplication of actions are avoided and that GlasTir actions are consistent with best practice. At present, despite CCC efforts there is no dialogue between the Caeau Mynydd Mawr SAC project (CCC and NRW) and Glastir, which has Marsh Fritillary as a targeted element within Glastir advanced scheme and operates within the same project area. This is complicated by confidentiality issues that could be overcome. Some Glastir management options would be detrimental to the conservation of marshy grassland.
- There are plenty of conservation organisations and LA ecologists/biodiversity

officers who do this effectively already! One of the primary objectives of Local Biodiversity Action Plans is undertaking effective communication and engagement and there is a long history of successful engagement here and good skills and knowledge on how to do so across a range of sectors using appropriate language and links.

- How LBAPs can contribute:

- Continue to operate as a partnership providing a county based focus for conservation organisations

- Community engagement

- Encourage volunteering and citizen science

- How Local Authorities can contribute:

- Support for LBAPs

- Work with other departments within LAs to evidence the links between biodiversity and economy, health and wellbeing, education, enhancement of communities, etc.

Action: Providing better Governance to benefit nature

Specifically with regard to LBAPS:

- Existing local and regional partnerships work well and currently contribute to the delivery many of the goals, and have been doing so for years.

- LBAP Partnerships have a range of partners and a depth of knowledge and experience that should be recognised. They are local and individual to their area and would function now independently of any requirement to have them as they are likely to be the only opportunity for local organisations, ecologists and recorders to network and develop partnership projects. LBAPs understand their area can disperse information and assess priorities. How will the role of local biodiversity action and the responsibilities of public authorities in the context of implementing natural resource management legislation be 'refreshed'? Any such 'refreshing' of these must be carried out in consultation with the Partnerships and with an understanding of the value of the work they have carried out.

- Any refresh of the Wales Biodiversity Partnership should be integrated with the ambitions of the developing plan and the governance structure of the WBP. LBAPs should have wider representation on WBP

- 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?**

- There is little mention of the types of practical action on the ground that WG envisages will be necessary to deliver the plan. Obviously specifics may not be possible but the type of practical action should be discussed. This would give those that will be expected to deliver the action a better understanding of what will be expected. This discussion would also ensure that targets and goals etc are actually achievable.

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

- Why should businesses deliver “our” ambitions? If biodiversity is to be delivered effectively by industry, then industry has to share these ambitions – How can this be achieved? - this is what needs addressing. As the ambition statement stands in the NRP, businesses are unlikely to understand it.
- Better early engagement with the relevant WG departments and organisations such as the CBI in Wales, leading industries, developers and farming unions. The process of developing the Nature Recovery Plan must actively include these departments and stakeholders, not just consult them. Work with businesses to develop their own biodiversity plans, review their existing practices with a view to reducing the impact these have on biodiversity, and explore opportunities for enhancing biodiversity as a result of their activities.
- Business, etc. are unlikely to deliver anything unless they have to – effective incentive/sanctions must be available to implement. BREEAM was supposed to deliver positive outcomes for biodiversity but the majority of developments miss out ecological credits as they do not 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.
- Ensure compliance with legalisation and regulations and take enforcement action against any breaches. Ideally review fines to make these meaningful. Sometimes it is cheaper to breach the regulation and pay the fine rather than adhere to it.
- Grants for infrastructure, regeneration projects and businesses should all 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. All WG supported projects should carry

a kite mark which certifies that the project meets the desired biodiversity standard.

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

- Support/ encourage regional projects, e.g. a South Wales Marsh Fritillary project but allow time for development and implementation. Ensure continuity of support and funding to build confidence in new approaches and reduce perceived risk.
- Make access to grant aid easier and less onerous. The EU LIFE grants appear to require the recruitment of an entire project management team in order to run the project and this is beyond the capacity of smaller organisations.
- Grant funding needs to take on board that LAs are unlikely at present to be able to appoint new members of staff so project work has to be fitted in alongside other responsibilities. NGOs may be in a different position regarding recruitment.
- Make sure that high level organisations, NRW/WG, LAs engage fully with delivering biodiversity and lead by example. If the NRP is to work with businesses they have to be involved at this level as well
- Better communication within the biodiversity sector. There has been concern for several years that those formulating policies and writing WG documents such as this NRP are not really in touch with the LBAPs, and those that deliver the practical biodiversity management projects, on the ground. Documents that include case studies of new methods and approaches to which readers can relate tend to inspire others to make changes. For a NRP or equivalent to work on the ground it has to be applied.

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

- Longer term funding commitments and support would assist in delivering integrated outcomes. Three to five year planning of actions would provide a framework for the delivery of integrated outcomes. The REF funded Carmarthenshire Bogs Project is an excellent example of a really successful new project that is approaching the end of its 18 month funding period, so resources will have to be used to apply for more funding to sustain the momentum that this project has created, bringing with it a period of uncertainty. Ideally successful REF funded projects would be moved seamlessly to a further longer term funding strand so they can keep moving forwards building on their successes.
- Involvement with and contributions from other government departments for the NRP should be considered if this is a truly integrated WG plan. For example, access to natural green space brings health benefits, and provides opportunities for leisure and some sports, are the deliverers of these projects engaging with the NRP?.
- Use the model of an integrated community strategy which brings together LAs, Health Trust, Fire Service and Police and provides one plan with shared strategic

objectives that informs the work of those contributing organisations at a strategic level.

- At the same time, do not overlook the advantages of a single organisation delivering some individual projects

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

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

- What is the Information Hub?! See <http://www.conservationevidence.com/> for an excellent model.

**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?***

- Longer term work plans are welcomed as they provide continuity and allow for the allocation of resources, 3–5 year work plan are acceptable, set within longer term objectives where appropriate. Habitat restoration for example may well take 10 years or more. Natural resources management projects may take decades in the planning and implementation and so a long-term view must be taken, not one based on political cycles. Annual reporting on active project seems appropriate and addresses both budget and seasonal work. BARS allows for the recording of biodiversity action so this system should form the basis of any further reporting that is desirable

**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.***

- Surely this is not a 'Plan' but a Strategy .We assume that a costed action plan ideally based on the 20 Aichi targets will follow.
- Language within plan. This consultation document lacks clarity and requires a number of definitions
- Consistency of terminology – biodiversity and Nature are used interchangeably when a consistent approach should be adopted.
- Of particular concern is the para – the role of protected areas in providing resilient ecosystems see p.8 final sentence of first para –

The wider countryside, in contrast, is under pressure....and as such cannot

necessarily maintain this underlying diversity. If what is written is what is meant this is of very serious concern as it implies that it is the view of WG that the wider countryside cannot maintain this underlying biodiversity. It is well established that the designated sites cannot do this in isolation either. It is imperative that in order to reverse the declines in biodiversity to which the NRP refers, the wider countryside is a place that supports biodiversity, provides connectivity and contributes to ecosystem resilience - hence the rationale for Glastir and previous agri-environment schemes. What is really meant in this section?

The lack of any meaningful reference to agriculture as a major grant funded business and land use is of concern.

**Ref: 0055 - John Bratton**

***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?***

Building resilience of ecosystems is an admirable aim, but linking it to capturing benefits to society suggests these resilient ecosystems will be geared towards tourism and other money-making businesses, and any habitats that don't yield a financial gain to someone will not be valued.

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

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

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

Yes, increasing connectivity, controlling pollution, removing invasive species are all fine aims, but there is nothing new here. There is no hint of how it will be done better in the future.

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

Wildlife conservation was a low priority in the Countryside Council for Wales. The Welsh Government has further diluted the effectiveness of its statutory conservation body by reducing it to a small annex in an organisation dominated by commercial foresters and civil engineers, many of whom refuse to acknowledge the new organisation even has a wildlife conservation responsibility. So the first important additional action required is to recruit some senior staff with conservation experience to put some balance into NRW. The second action required is to stem the loss of specialist wildlife expertise from NRW. The expert in upland habitats was not replaced when she retired. The latest report is that the senior invertebrate ecologist won't be replaced when he retires next year. This is the equivalent of a city hospital deciding it doesn't need to replace its oncologist and cardiologist. It is

laughable to suggest the Nature Recovery Plan can be delivered by an NRW in which the conservation staff continue to be diminished and sidelined.

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

Protection of wildlife habitats is an obligation that needs to be imposed on business. The planning process has to be reset to give protection to SSSIs and County Wildlife Sites, instead of the current system of allowing feeble mitigation plans to win the day for developers. Wildlife conservation is not an activity that can be carried out in isolation while the rest of society carries on as usual. Until it is as pervasive as Health & Safety, all conservation work can be undone by another more powerful sector.

**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 progress needs to be measured by improvements on the ground - increased acreage of high quality habitat, increased populations of target species. Progress is not measured by the establishment of agreements, the setting up of partnerships, the writing of scoping studies, the devising of monitoring protocols or the amount of money spent.

**Ref: 0056 - RWE Generation Plc**

Overview

The commitment to an integrated approach to cross-sector policy matters is welcomed by RWE as is the encouragement of effective communication and engagement with all stakeholders.

RWE responded to the Environment (Wales) Bill proposals in January 2014. As part of this earlier consultation RWE made it clear that it considers it essential that natural resource management as put forward in those proposals is co-ordinated closely with the land use planning system and with plan preparation at all levels in particular.

This applies as much to the biodiversity and ecosystem resilience aspects as to other components of natural resource management. This link is not made sufficiently strongly in the Nature Recovery Plan document and RWE consider that this aspect should be strengthened. In addition, to ensure a cohesive approach, similar links need to be made with the planning and development of transport, energy, waste management, water and sewerage infrastructure.

The focus of the ambition (Consultation questions 1 and 13) is supported but RWE consider that the ambition statement (Consultation questions 2 and 14) should be

extended to read:

To reverse the decline in biodiversity and ensure lasting benefits to society by building the resilience of our ecosystems, by focusing on effective natural resource management, integrated into land use and infrastructure planning (addition emphasised).

RWE supports the proposed goal of putting into place a framework of governance but strongly believes that framework must include the integration of biodiversity and ecosystem resilience considerations into land use and infrastructure planning at all levels in Wales. (Consultation question 15). This is to some extent addressed by the proposed strategic action of “Facilitating Cross-sector policy integration”.

”Facilitating” in this context is not considered strong enough. The Welsh Government needs to put this integration on a statutory footing, as is proposed via the Wellbeing of Future Generations Bill and the Environment Bill.

In the particular case of the land use planning system it is essential that biodiversity and nature recovery policy is given full weight as part of Welsh planning policy, and this needs to be written into future versions of Planning Policy Wales. The implications need to be picked up on an area/location specific basis in the National Development Framework, strategic development plans (where prepared) and local development plans. The Welsh Government will need to monitor the integration of biodiversity and ecosystem resilience policies into plans prepared by local authorities (especially SDPs and LDPs) and other agencies and intervene if (Welsh) national policy is not being effectively cascaded down to local level.

RWE considers this aspect to be of particular importance and proposes that it merits another goal along the following lines:

To integrate the protection and enhancement of biodiversity and improvement of ecosystem resilience into Welsh infrastructure and land use policy and development management at all levels.

Specific Responses to Consultation Questions:

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

The ambition is focussed on reversing the decline in biodiversity and building resilience and is therefore aligned with the aims of the Nature Recovery Plan. As presently written the ambition does not explicitly acknowledge the benefits that society is currently receiving from ecosystems.

Understanding the underlying resilience of ecosystems as a whole is important as is

understanding the beneficial use made by society of the natural environment. These beneficial uses may have influenced the evolution of existing ecosystems.

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

As well as explicitly acknowledging the beneficial uses that society makes of the environment (see 1), the ambition statement could be improved by specifying the spatial scale over which the biodiversity decline will be measured.

In addition, as highlighted in the overview above, RWE consider that the statement and approach should be strengthened through integration with the land use and planning system and that the ambition should be extended to read: To reverse the decline in biodiversity and ensure lasting benefits to society by building the resilience of our ecosystems, by focusing on effective natural resource management, integrated into land use and infrastructure planning (addition emphasised).

**3 & 15. Are our goals the right ones? What might. Be added?**

RWE agree that the goals are the right goals but to be able to provide further comment more detail is required on how the goals will be achieved and the associated initiatives which will require implementation. As with comments on the proposed Environment Bill, RWE would urge that greater consideration is given to those sectors where activities result in the greatest impact to ecosystem services (eg controls on housing development, agriculture, fisheries and transport policy), rather than those whom the greatest control can be exerted directly by Government agencies (eg industrial sectors already subject to control under the environmental permitting regime)

One of the targets is to achieve no net loss of biodiversity. To be practically useful this needs to be qualified with a spatial scale. RWE suggest no net loss in biodiversity within Wales is appropriate as it then aligns with the scales of the Welsh Marine Plan.

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

In considering Putting in place effective natural resource management – reference to optimising “social, economic and environmental benefits” is supported but, generally, this consultation deals with the economy and business mainly in passing. If not fully integrated within the planning system for all projects this approach could be seen as an additional opportunity to object to development proposals for highly regulated projects such as those within the energy sector.

Funding our partners – At this stage, there is little detail on how this would be achieved. It is important that NRW and other nature organisations are sufficiently

funded to support the delivery of the actions set out in this plan. This is a particular concern in the context of planning where, in our experience, these organisations sometimes lack the resources to meet the deadlines for consultation responses and to engage in the discharge of consent conditions (eg habitat restoration and biodiversity monitoring) once projects are operational. This may, in part, be addressed by the current Planning (Wales) Bill which seeks to legislate on the matter of substantive and timely consultation responses, but will by itself not solve consultees' resource problems.

Where planning conditions require ecological monitoring it has been our experience that onerous conditions are sometimes placed on a development but there is limited feedback or interest in the monitoring results once the project is operational. Attention is given to designated sites and protected species rather than biodiversity in general. There is often only limited use of monitoring data from similar projects and better use could be made of the outputs of consent conditions in terms of an integrated planning approach and compilation of relevant data for all planning requirements associated with biodiversity. This will require sufficient resources within the bodies responsible for reviewing monitoring results (most often NRW and/or local planning authorities) and greater co-operation between them to enable the data to be disseminated and captured in a managed way for use in future planning decisions.

With regard to Reviewing Designated Sites and Species, RWE would welcome the intention to review the relationship between the Natura 2000 sites, other designated areas and the wider environment. In our experience the focus on the Natura 2000 sites, while legally necessary up to a point, can be at the expense of wider biodiversity management.

With regard to Improving the Evidence Base, RWE commented at length on monitoring and data issues in response to consultation Question 8 (asking if NRW should be the lead reporting authority) of the Environment Bill consultation and those comments remain relevant and are repeated here:

The assessment of progress on delivery of the national outcomes and implementation of priority actions is an essential part of the overall natural resources management process. It is appropriate for NRW to co-ordinate natural resources data collection and reporting as it will already be in possession of much of the information as a result of its wider activities, whether gathered by itself, local authorities or applicants/holders of various consents and permits. However, local planning authorities have an important role in data collection, as do other public authorities, wildlife trusts and other voluntary sector bodies and community groups. While public authorities will be under a duty to co-operate, it is important that the voluntary and community sectors are encouraged to participate actively in the natural resources data collection and reporting process. NRW should liaise with

these bodies to take advantage of the available data.

The developers of projects subject to environmental impact assessment and operators of installations subject to environmental permitting are increasingly required to undertake environmental surveys, monitoring and reporting as part of EIA and the environmental permit application process, and as a condition of their permits. The results of this work are by definition in the public domain. Monitoring data in support of environmental permits are by definition available to NRW and are available to the public, although not always conveniently, through public registers. These data are an important input to the natural resources management planning process.

The natural resources reporting arrangements should include changes which are proven or suspected to be effects of climate change, and adaptations to climate change.

Part of NRW's reporting role should be to facilitate the wider public availability of data on natural resources in Wales. The economic value of this data base is considerable, it should be treated as a public asset and made freely available to all who have a legitimate use for it, with a minimum of formalities.

We are concerned to ensure that project developers and installation operators should not be required to undertake environmental surveys and monitoring activities as part of wider natural resources data collection, beyond those reasonably required for the purposes of their consent or permit applications and the monitoring of the impacts of their operations. In our experience CCW required further information which was apparently to meet shortfalls in their data rather than because it was necessary for the assessment or subsequent monitoring of the effects of the projects concerned.

The flow of environmental data between business and NRW should in principle be a two-way process to a much greater extent than is often the case at present. This would be to the benefit of business, NRW, local and other authorities and the public.

NRW must be adequately resourced to perform its natural resource data management and reporting role in a timely manner. Data management, monitoring and reporting should be focused on the delivery and implementation of policy objectives, as opposed to research projects.

Under the heading Providing better Governance to benefit nature there is a statement that the Wales Biodiversity Partnership will identify species or habitat that society wishes specifically to see benefit from improvements to our ecosystems. There is potential for society to value highly a few iconic species which could bias policy. As a general principle we support science based measures which value ecosystems rather than targeting a limited number of species.

### **5 & 17. What additional action would you like to see?**

To strengthen the Nature Recovery Plan RWE consider it important to consider wider planning policies within Wales where additional opportunities and links can be made to ensure nature recovery is fully integrated into land use and planning. To this end it is suggested that an additional goal is incorporated within the Plan.

To integrate the protection and enhancement of biodiversity and improvement of ecosystem resilience into Welsh infrastructure and land use policy and development management at all levels.

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

Engagement with business will occur through the planning process. Once developments have occurred it may be difficult for businesses to modify their impact on the environment without loss of other societal benefits such as employment opportunities. This consultation is an example of engagement with business.

It is important to ensure communication with businesses is maintained throughout the planning process, this would include post planning consent conditions which can require monitoring for several years. As highlighted within Question 4 it is important that agencies continue to liaise with businesses following completion of a development as many monitoring requirements span several years and the current system can be weak in terms of engagement once a site becomes operational and results are reported. It is important to recognise the need for review as monitoring continues and data becomes available for all sites and not just those with protected species and habitats.

There is a need for greater flexibility in post-development monitoring arrangements, so to take account of the findings of the early stages of post development monitoring programmes. Otherwise monitoring resources may be wasted on matters which prove to be non-issues in terms of their effect on habitats and species, early in the post development monitoring phase. It is important that planning conditions and local planning authorities' management and enforcement of them allow for flexibility to adapt to changed circumstances and unexpected monitoring findings.

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

An opportunity to build links associated with nature recovery and biodiversity in general exists through a project lifespan, not only through the development and planning process. Statutory regimes such as environmental permitting are backed by the criminal law. While this is necessary in the last resort, depending how NRW approaches regulation, it may not be conducive to the co-operative working between business and NRW required to get the best value out of scarce resources for ecological monitoring and biodiversity management. By building links during the

initial planning process and maintaining them through a co-operative process of subsequent monitoring and management a stronger link will be forged allowing further discussions and the sharing of knowledge and information.

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

There is a need for ongoing research into biodiversity, for example the spatial scale of impacts on overall ecosystem function, there may be potential to share budgets within government departments funding such research. Accepting research programs as a valid mitigation measure for the residual impact of a development would be a method by which needed research could be funded.

In addition, an organised approach to the review of data collected during post construction monitoring would consolidate data and negate the need to request costly monitoring surveys if similar data already exists.

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

As highlighted within the overview, RWE consider it vital that the approach is strengthened through integration with land use and infrastructure planning.

**10 & 22 .How can we best use the Information Hub to collate and disseminate data and evidence?**

It is unclear at present the intended form of the Information Hub. As a general principle sharing of information is something to support. However biodiversity is a complex subject and there will be a need for an editorial policy to ensure that data and analysis on the Hub is of useful and known quality.

If full benefit is to be gained from the Information Hub, information on the Hub needs to be readily retrievable both by subject and by the location to which it refers.

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

Changing biodiversity will need multiyear planning. An annual review of a progress of such multiyear plans is appropriate.

**Ref: 0057 - Rachel Tindall**

I am pleased that the Welsh Government is working towards a Nature Recovery Plan. However I am concerned that you can't be serious if at the same time you are planning to build the Newport Relief Road through the Newport Wetlands, which is a globally important area for migratory birds. My husband and I visited this nature reserve for the first time on Sunday and loved it, and we would hate it to be spoilt for future generations.

Please listen to the environmentalists.

**Ref. 0058 - Anne Brenchley**

Dear Sir,

RE: The Nature Recovery Plan and the Environment (Wales) Bill.

As a Welsh resident, I am writing to share my concerns that the Welsh Government does not appear to understand that maintaining and enhancing the natural world is fundamental to the overall health of the Welsh nation. The multitude of plans, strategies and discussions that have taken place over the past years since the Rio Convention in 1992 have not delivered a world with as much variety of life as present in our previous generation.

The Nature Recovery Plan is just another set of good words with little commitment to action. What is proposed is not enough to bring back our wildlife and that essential healthy environment in which we are just a part. Reducing biodiversity is not just 'a shame' but indicates a poor future for all of us in Wales.

Fully funded action is vital. Natural Resource Management through integrating policies and plans is only part of the process but in itself will not deliver the required end result. Our network of special places and the threatened and precious wildlife found in those places and also in the wider countryside are being eroded every year. There is an enormous task ahead to improve our natural wildlife resource. Sites need to be fully protected and where possible enlarged and connected.

Scientific evidence has to be at the core of all environmental decisions. The Welsh Government's scientific advisors need to be completely independent in their thinking and research. This is far from the case at present. Funds need to be made available for monitoring to fully understand the consequences of our actions.

Welsh Government has a huge opportunity to lead the way and protect and maintain country famous for its wild places and special wildlife for future generations. Many things that my generation took for granted have already gone or are now so rare that most people will never have the opportunity to see them. A homogeneous landscape, devoid of wildlife, is not a vision of Wales that I want to remember. In the long term we will reap the consequences. Real action is what is required and I hope that the Welsh Government has the courage to see that.

**Ref. 0059 - Pembrokeshire County Council**

Consultation Questions

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

Pembrokeshire County Council supports the overall ambition to address resilience

of our ecosystems and capturing and identifying benefits for society.

The council would welcome more detailed proposals in the final plan version on how the benefits for society are captured and how these will be used to support the case for public spending on biodiversity conservation. There also needs to be an additional focus on the intrinsic value of biodiversity.

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

The ambitions in relation to the Welsh National Marine Plan and Marine Strategy Framework Directive seem disjointed and separate from the overall Nature Recovery Plan. More work needs to be done to integrate the marine aspects with the overall strategy.

The ambition statement should include reference to public engagement in and understanding of biodiversity conservation. Without greater public understanding and support, conservation effort will always be marginalised. Mainstreaming biodiversity applies to public attitudes as well as policy making.

The ambition identifies the need for addressing resilience; however there is not enough detail on how this will be done.

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

The first goal relating to degraded habitats needs to be clear. The summary states that degraded habitats will be restored and the main text states they will be improved.

It seems unrealistic that the Aichi targets will be achieved by 2020, the timescales are challenging, especially as this Plan will not be agreed until 2015 at the earliest, for example the targets relating to status of biodiversity (Strategic Goal C of the Aichi Biodiversity Targets).

The specific measures and targets for the final agreed goals will also need to be consulted upon so that all interested parties have the opportunity to influence the measures and targets.

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

The actions are ambitious and will require clear and focused work to achieve international commitments under the CBD within the 5 years remaining. If the actions are not yet developed these targets will be difficult to meet.

The 'focus for action' introduces some interesting ideas; however it is not wholly clear how this fits in with the Plan.

The focus for action section is to be developed at the next stage of the delivery of

the Nature Recovery Plan and Pembrokeshire County Council would welcome the opportunity to shape this aspect of the Plan.

#### Effective natural resource management:

The main focus for building resilience defined in this document is increasing connectivity. There are concerns that the Plan does not go far enough towards building resilience on a wider scale. Pembrokeshire County Council would like to see more detail on actions for building resilience and more detail on what effective natural resource management entails in practice for the County Council.

Natural Resources Wales are able to look at the environment as a whole and ensure that it and our natural resources are sustainably maintained, enhanced and used. Since being vested in April 2013, NRW is still in its infancy and many operational issues and details are perceived by others as yet to be resolved. The County Council suggest that this is a major factor influencing the delivery of the Nature Recovery Plan for Wales.

#### Facilitating cross-sector policy integration:

In relation to the Plan facilitating cross-sector policy integration there appears at present to be limited mention of biodiversity in the current Planning Bill consultations. The County Council welcomes cross reference to Local Biodiversity Action Plans and developing evidence bases in the recent Planning Bill consultation on the Local Development Plan process, and would want to ensure that biodiversity is suitably represented in any future consultations and iterations under the proposed planning reforms. It is the Council's view that WG's approach to the NERC duty needs to be strengthened to ensure biodiversity is embedded further within all policy areas and sectors.

#### Funding our partners:

The County Council would urge that WG and NRW confirm funding arrangements specifically partnership funding, and would welcome the opportunity to continue to deliver biodiversity benefits which achieve WG, NRW and Pembrokeshire County Council outcomes for the natural resources of Pembrokeshire and the wider area. In terms of options for funding, a clear, realistic and logical grant funding scheme would be welcomed, but the opportunity for core funding would be preferable. This would also demonstrate to delivery partners the commitment of WG and enable longer term planning and delivery. The County Council perceived constraints with the WG Nature Fund process; any further fund of this type would need to integrate more closely with the Nature Recovery Plan and other proposed strategies. The County Council seek assurances that the constraints and teething problems experienced with the WG Nature Fund would be ironed out before any further programmes are implemented.

Further to WG proposals for opportunities for funding, more support for organisations to access funding, would be welcomed.

#### Financial instruments:

The County Council agree that it is crucial for investors to appreciate that action to strengthen the resilience of our ecosystems will bring economic benefits. WG support for payments for ecosystem services (PES) is essential. The County Council would wish to see appropriate governance and ensure that the proposed facilitators are both independent and operate at arm's length from WG or NRW.

The way that the concept of PES is communicated to all sectors is critical to ensure that opportunities for investment in green infrastructure are maximised.

The view that schemes receive funding to offset dispersed impacts from individual development plans appears to conflict directly with the Plan's ambition to reverse the decline of biodiversity and would also not achieve CBD goals. Under this system biodiversity would maintain the status quo only. The County Council suggest that this strategic action be strengthened and will look forward to seeing more detail in future iterations of the Plan.

WG's proposal to use these mechanisms is welcomed but we would wish to see that these were fit for purpose.

Raising awareness of biodiversity should be done in a meaningful way for the layperson to identify with this action.

#### Reviewing designated sites and species:

The County Council welcomes the WG and NRW integrated approach to natural resource management and look forward to the review of site management plans, the relationship between Natura 2000 sites, other designations and the wider environment and how this will align and focus the legislative framework. The County Council welcomes receiving information on the condition and status of designated sites which WG will need to inform the review.

#### Improving the evidence base:

Pembrokeshire County Council approve of proposals under the Environment Bill for NRW to produce a State of Natural Resources Report and the growth of the Information Hub. Integrating this with the evidence base needs of other organisations would support a collaborative and efficient approach.

#### Encouraging effective communication and engagement and providing better governance:

These proposed strategic actions are critical to the success of the Nature Recovery

Plan for Wales. Existing partnerships in Pembrokeshire, particularly the Local Biodiversity Partnership are considered an exemplar of best practice and innovation throughout Wales. The County Council agree that WG learn from existing partnerships. We wish to see successful systems mirrored across Wales to provide a consistent approach. Further aligning partnerships with other policies and strategies (for example the Single Integrated Plan, Local Service Boards, Environment Forums) could provide greater benefits for biodiversity and deliver the Nature Recovery Plan for Wales.

The Council would seek assurances that any changes to partnership working are efficient and do not undermine an already successful and productive partnership in the County.

The County Council have concerns that there is limited detail at this stage on the proposed refresh of the Wales Biodiversity Partnership.

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

Pembrokeshire County Council's view is that the extent of embedding the ecosystems approach is still limited. People delivering services (outside of the conservation sector) on the ground may not see how their work fits into this approach. The way in which these concepts are communicated to the public is also critical. It should be easier to understand by all. This also relates to payments for ecosystems services.

Detailed comments on the strategic actions are stated in question 4 above.

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

More robust mechanisms for recovering the true cost of mitigating against negative environmental consequences of business activity are required. The true long term costs of waste disposal, energy use and materials should be reflected.

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

WG should build on those existing partnerships and working relationships to avoid duplication and encourage complementarity. Core funding for Local Biodiversity Partnerships to engage an officer to facilitate partnership working to optimise biodiversity outcomes for available budgets across the sectors is essential.

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

The Council have explained the need for core funding, and the need to align all plans, policies and strategies in questions 4, 5 6 and 7 above. This will ensure integrated outcomes for WG, NRW and other partners.

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

See previous comments above.

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

An Information Hub is critical for the project, and managed appropriately should avoid duplication and support the strategic aims of the Nature Recovery Plan.

The process should ensure regular liaison with LBAP Officers to ensure two way flow of information between central and local partners. LBAP Officers have detailed knowledge of local conditions and potential partners for a wide range of initiatives.

The Information Hub could use existing partnerships and mechanisms to disseminate 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?**

The Council welcome the proposals for a Communications Plan, Evidence Plan and a refreshed governance structure. We would expect these plans to provide detail of how any changes proposed as a result of this consultation have been taken forward.

The periodicity for this Plan should be in line with proposals within other legislative frameworks and plans, including the Well-being of Future Generations Bill, the Environment Bill, the Marine Transition Programme, Single Integrated Plans and Local Development Plans. Reporting on the progress of the Plan should be proportional and realistic to ensure that targets are monitored and interventions identified to address deviations from these targets early enough to take action and ensure compliance with the CBD. A longer term plan enables partners and organisations to align their work programmes with the strategic objectives of the Nature Recovery Plan for Wales.

**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.**

There are a number of other aspects the County Council would have expected to be included in the Nature Recovery Plan for Wales consultation, namely:

- Proposals for Sustainability Appraisal, Strategic Environmental Assessment and Habitats Regulations Appraisal, and any other statutory assessments of the Plan which may be required;
- Acknowledgement of the resource and capacity issues faced by

organisations;

- Whilst the valuation of specific goods and services is a good way to engage business and those holding public funds, greater reference to the wider argument about the intrinsic value of biodiversity and the need to ensure inter and intra generational ability to benefit from healthy, functioning ecosystems should be made more explicit in the Plan.

**Ref. 0060 - Ken Maurice**

Dear Welsh Government,

I understand that Natural Resources Minister, Carl Sargeant, and his Welsh Government officials are developing a Nature Recovery Plan and new legislation, the Environment (Wales) Bill. The policy plan and new law could go a long way towards saving nature. But there's a problem.

There's not enough action in the plan to meet nature's needs.

Bizarrely, the Nature Recovery Plan doesn't say much about how we're going to achieve nature's recovery. There is very little action included in the plan. It contains many good words, but it doesn't show the commitment to action or access to funding that will make the difference nature needs.

Instead Welsh Government has pinned its hope for nature's recovery on an idea called "natural resource management". This proposes to integrate plans and policies to join up the different ways people work across the environment in Wales, from farmers to fishermen, conservationists to construction workers. This joined up approach makes sense and is necessary. But Government is missing the point if they focus on process at the expense of action for nature in our fields, wetlands, seas and mountains. On its own, Welsh Government's "natural resource management" is not enough to bring back our wildlife.

For nature to recover, it needs strong leadership from Government:

- The Nature Recovery Plan must include a fully funded plan of action on the ground to restore our most precious and threatened wildlife, and create space for nature in our network of special sites, and across our wider countryside and seas. Monitoring measures must be included so we can see whether we're meeting nature's needs.
- The Environment (Wales) Bill needs to use its power to unite society to save nature. It must set long-term legally binding targets for nature's recovery, and declare it a duty of all public bodies "to further the conservation and enhancement of biodiversity" in their activities. With these points enshrined in law, action for nature will be a priority in Wales
- We need a fully funded plan of action that meets nature's needs. Welsh

Government thinks our wildlife will recover because a new approach called “Natural Resource Management” will integrate policies and plans to change the way people work across the environment in Wales. This process may go some way to help, but on its own it is not enough.

- Improving our network of special places and most threatened and precious wildlife is essential. We need Welsh Government to invest in restoring our special sites and priority species and habitats. Our sites must be bigger, better and more connected and our threatened and precious wildlife restored. Commitment to improving these crucial nature conservation tools in the Nature Recovery Plan is essential.

- Investment in scientific evidence is essential. We need to be able to see what’s working and what’s not – monitoring the condition of sites and trends for a full range of species and habitats is essential. This helps us see nature’s needs and ensures we’re using the right tools for the job. We can’t restore the nature we’ve lost if we can’t see what we’re doing.

- Welsh Government must show strong leadership and ambition by making it law to achieve nature’s recovery. We need the Environment (Wales) Bill to enshrine in law long-term legally binding targets that promise to reverse declines in nature. We need the law to also declare it a duty of all public bodies “to further the conservation and enhancement of biodiversity” in their activities. This will give nature recovery the power it needs to succeed.

I hope you can spare the time to consider these points in the consultation process and maybe even put them into “action” as that is what is desperately needed to save wildlife in Wales.

I look forward to hearing from you and to see the positive outcomes of this process in the near future.

Biodiversity & Nature Conservation  
Rhodfa Padarn

Llanbadarn Fawr  
ABERYSTWYTH  
SY23 3UR

22/11/2014

Dear Sir/Madam,

NATURE RECOVERY PLAN.

I am writing to comment on the above plan. We need a fully funded plan of action to meet nature's needs. In addition, improving our network of special places & most threatened & precious wildlife is essential.

Investment in scientific evidence is also essential. Welsh Government must show strong leadership & ambition by making it law to achieve nature's recovery. We need the Environment (Wales) Bill to state long-term legally binding targets that promise to reverse declines in nature.

I would be grateful if you would  
take account of the foregoing  
please.

Yours  
P C  
fairly,  
Cuff Mr.

## **Consultation Response Form**

Your name: Steve Lucas

Organisation (if applicable): Bat Conservation Trust

email / telephone number: slucas@bats.org.uk

Your address: Swansea Environment Centre  
Pier Street, Swansea, SA1 1RY

### **Consultation Questions**

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

NO.

Whilst there is much to be welcomed with his ambition, we feel the Welsh Government should not become so fully focussed on an aspiration that ecosystem resilience, by focussing natural resource management, is the only mechanism by which to carry out nature conservation. This would seem unrealistic, at least for the foreseeable future, as it would require a substantial cultural shift in environmental considerations and thinking. Until that time we will need a range of options if we are to properly and fully play our part in achieving our international obligations. Ecosystem resilience is a necessary basis for nature conservation management but other mechanism including site specific management and protection, as well as species conservation measures, will also need to be employed for key habitats and species that are currently rare and threatened. In the same way society dedicates space for people (such as allocation for housing and other infrastructure), nature needs its own space and we should not only rely on integrating plans and strategies as the primary mechanism for nature.

Furthermore, we do not agree that the focus of nature conservation effort should be directly linked to benefits to society – often there will be direct or indirect societal benefits and where these occur they should of course be highlighted. Whilst we depend on the natural environment for services that are essential to human well-being, there are elements of the environment that are perhaps less

obvious and the Nature Recovery Plan must remain focused on protecting and restoring our biodiversity for its own intrinsic sake whilst recognising the benefits that nature and its many processes and functions can do to improve our prosperity and well being.

The consequence of linking biodiversity to benefits to society can be that this commodifies species/habitats dependent on what society needs. Furthermore, that perception of need may vary between parts of our society and communities leaving a confused and incomplete picture. This will also have the effect of placing a financial value on wildlife and/or natural processes. Whilst using relevant monetised services may be a useful way of presenting important arguments and engaging business and other Government departments, the methods for doing this for all aspects of valuing nature are not yet clear cut or widely understood or applied. It is these more difficult to value intrinsic and cultural values associated with wildlife and landscapes that will have resonance with the people.

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

BCT 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.

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

- *To restore degraded habitats* (suggested amendment to title)  
The supporting text in the draft NRP confuses degradation and diversity. There will be instances where increasing diversity is not a desirable outcome as that in itself could lead to degradation of a key habitat.
- *To address the key negative factors for biodiversity loss* (suggested amendment to title)  
Whilst we agree with the text on connectivity and the need to restore that connectivity, this is not the only important factor that will need to be addressed. Highlighting connectivity as a goal in its own right is misleading. We would suggest a series of sub-bullet points to highlight the key issues would be a better way to identify the key factors:
  - habitat fragmentation and loss of connectivity,
  - habitat loss
  - invasive species
  - pollution
- *To improve the management of our quality environments* (suggested amendment to title)  
We do not consider that simply focusing on the 'highest' quality environments will necessarily achieve the desired outcomes other than for those environments. We should be looking to positively managing all of our quality environments.

We would very much welcome the principle of managing quality environments in the context of the wider environment but are not clear whether Natural Resource Management will simply focus on the core elements of water, soil and air in the expectation that species and habitat recovery will follow.

- *To achieve 'no net loss' of biodiversity*

Whilst we are pleased to note the intention to halt further loss of biodiversity, BCT is uneasy about the principle of a 'no net loss' policy, although we recognise that this is derived through an EU policy, it does not necessarily have to be adopted by Member States. A 'no net loss' policy needs to be treated with caution and we would suggest that it should only apply to the wider countryside and not to key species/habitats whose conservation status is already at threat and/or is declining. At some point in the future, then a no net loss policy could be more widely adopted.

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

BCT agrees with this goal

If the goal are amended to those modifications suggested above this will make it absolutely clear what the intention is without confusing or misleading the reader with other aspects that also need to be addressed.

There is frequent reference to the Aichi targets which we would support however, these should also be viewed in relation to Wales and they may not always be relevant, desirable or achievable. The targets that are chosen for Wales Nature Recovery Plan must be appropriate to the conservation (resilience) needs for the component habitats and species of our ecosystems.

We note that the intention to put in place specific measures and targets for the final agreed goals, however this reinforces our view that this draft Nature Recovery Plan is not a Plan but a document setting out the principles for nature recovery.

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

BCT would agree that an integrated approach to sustainable management is key to achieving our goals but there appears to be some misunderstanding between ecosystems and biodiversity, and the actions needed as set out in the table Focus for Action.

- Evidence and Research.

An **ecosystem** is a community of living organisms (plants, animals and microbes ie biodiversity or biotic component) in conjunction with the non-living (abiotic) components of their environment (like air, water and mineral soil), interacting as a system. We would contend that there is sufficient knowledge and understanding about the causes of biodiversity loss and ecosystem degradation to address these issues but we do agree that further understanding of interaction between the components of ecosystem and functioning is needed. In the absence of research and scientific evidence, then we will need to rely on best expert opinion and advice. We need to build policy around the evidence and not evidence to support policy.

- Monitoring and surveillance

BCT strongly supports this focus. BCT operates the National Bat Monitoring Programme (NBMP). This Programme has been operating since 1997 and it is the longest running multi-species monitoring programme for mammals in the UK. It produces trends for 11 species of bat using data collected by volunteers from three main survey methods – field surveys, hibernation surveys and roost counts. Trends are produced as an index against a baseline set at the start of the monitoring period. The NBMP operates across the UK. For the first time in 2013, species trends were produced at country level for Wales from Hibernation Surveys ([http://www.bats.org.uk/pages/summary\\_of\\_trends\\_in\\_england\\_and\\_wales.html](http://www.bats.org.uk/pages/summary_of_trends_in_england_and_wales.html)).

- **Safeguarding species, habitats and ecosystems**  
BCT strongly supports this focus however, this must be based on nature conservation needs and not simply on what society wishes to see delivered. Safeguarding will need to be backed up with appropriate statutory enforcement procedures.
- **Engagement and Support**  
BCT strongly supports this focus. We will need to build engagement and confidence not just with the wider public (as previously stated in 1 above, it is the intrinsic and cultural values associated with wildlife and landscapes that will have a resonance with people), but also with other strategic delivery mechanisms. The Third Sector has a wealth of experience engaging with the wider public and we will have a major part to play in the successful delivery of this element of work.

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

- **Site specific and species management**  
Until there is sufficient evidence that Natural Resource Management will deliver the objectives that are needed, BCT would wish to see explicit recognition and commitment that site specific and species management will remain part of the actions needed to deliver nature conservation recovery and resilience.
- **Reviewing of designated sites**  
BCT welcomes Welsh Governments' intention to set clear goals for European designated (Natura 2K) sites but we believe that this could go further and be extended to all statutory domestic sites. The suite of Natura 2K sites that have been identified are those in support of species and habitats listed under Annex I and II of the Habitats Directive and these should be seen as a sub set of the domestic SSSIs and NNRs. There remain gaps in the Natura 2K series.

Focusing only on Natura 2K sites undermines the importance of the SSSIs and we note that these are already considered by Natural Resources Wales to be of importance for Wales' natural heritage. Whilst there are flaws in the selection process of sites for notification as SSSI, these have none the less been identified by rigorous scientific criteria. However, the selection of SSSIs does not cater for all sites of equal or similar quality indicating that there are areas that are worthy of designation that have yet to be designated, and these sites that are of good biodiversity value that need to be maintained and managed appropriately. Where sites no longer qualify as SSSI, then there is scope within existing legislation to de-notify such sites.

It may also be appropriate to look at the description of sites in terms of air, water and soil management as well as other societal services such as flood control.

- Ensuring linkages with key statutory instruments

BCT believes that there is great opportunity with the emerging Well-being of Future Generations Bill and the Environment (Wales) Bill to ensure delivery of biodiversity targets. In particular, the Well-being of Future Generations Bill should contain a clear definition of sustainable development including the concept of living within environmental limits.

The Environment (Wales) Bill is a chance to provide Welsh Government and Natural Resources Wales with the legislative framework to strengthen the protection and enhancement for the natural environment. This could be done by strengthening the duty under section 40 of the Natural Resources and Communities Act 2006. We would suggest that amending the duty to *'Every public authority shall, in exercising its functions, take all reasonable steps so as to further the restoration and enhancement of biological diversity, in the proper exercise of their functions, to the purpose of conserving biodiversity'*. This would accommodate the new approach that Welsh Government wish to adopt for Natural Resource Management and the concept of resilience. It would also allow for potential future changes in conservation policy.

We would also suggest that the Environment Bill could be used to make biodiversity targets statutory to enable cross government and Local Authority support

- 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 focus on natural resource management will result in on-going (reductions in funding for nature conservation.

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

BCT will be addressing this issue through its work on the Wales Biodiversity Strategy Board.

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

Welsh Government and its agencies need to 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 and share the aims and objectives of the third sector organisations, as it is about how the third sector organisations can deliver government aspirations.

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

BCT will be addressing this issue through its work on the Wales Biodiversity Strategy Board.

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

BCT will be addressing this issue through its work on the Wales Biodiversity Strategy Board.

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

BCT will be addressing this issue through its work on the Wales Biodiversity Strategy Board.

**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 will need to make clear that some objectives and targets are going to take many years to achieve and that building resilience into our ecosystems is not going to happen over night or indeed over the lifespan of governments.

We would suggest that since it has taken five years to deal move on from the failure to reach the 2010 targets, it would be appropriate to put in place stringent timed work plans for the remaining five years leading to the 2020 target to halt and reverse the loss of biodiversity and the degradation of ecosystem.

Bat Conservation Trust, as a species organisation, has a primary interest in the conservation of biological diversity and the natural environment and we will measure success by outcomes for species and indirectly by the habitats that support those species. We will be addressing this issue through our work on the Wales Biodiversity Strategy Board

**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.**

Notwithstanding our detailed comments to the questions posed, BCT is of the view that this is not a Plan but a document setting out the principles by which

Welsh Government wishes to develop a Biodiversity Strategy or Nature Recovery Plan.

BCT is disappointed and saddened that there is still scant recognition of Wales' important flagship species, especially where these are of international significance, and the need for species conservation measures to ensure that the decline in species is arrested and reversed. Whilst Natural Resource Management is to be welcomed for managing the wider countryside, general management alone of our natural resources, will not be sufficient and it will be necessary to appropriately tailor land and marine management to ensure the future for these flagship species.

The consultation document is by and large, helpful and encouraging, although some aspects are misleading or unwise. With some minor amendments, this document could form the basis of a good and strong biodiversity strategy / nature recovery plan for Wales.

Responses to consultations are likely to be made public, on the internet or in a report. If you would prefer your response to remain anonymous, please tick here:



# Cymdeithas Edward Llwyd

Cymdeithas Genedlaethol Naturiaethwyr Cymru

Elusen Gofrestredig rhif 1126027

Tŷ Capel Bethel  
Golan,  
Garndolbenmaen  
Gwynedd  
LL51 9YU

Y Gangen Bioamrywiaeth a Chadwraeth Natur  
Rhodfa Padarn  
Llanbadarn Fawr  
Aberystwyth  
Ceredigion  
SY23 3UR

23 Tachwedd 2014

## Ymgynghoriad ar Gynllun Adfer Natur Cymru – Ymateb Cymdeithas Edward Llwyd

Sefydlwyd Cymdeithas Edward Llwyd yn 1978 gyda'r bwriad o hyrwyddo "Ymwybyddiaeth o amgylchedd a threftadaeth naturiol Cymru, a gweithio dros eu gwarchod" Y mae oddeutu 1000 wedi ymaelodi gyda'r Gymdeithas

Yn y Pwyllgor Gwaith a gynhaliwyd ar y 13eg o Dachwedd 2014 penderfynwyd ymateb i'r Ymgynghoriad fel a ganlyn:

- Bod y Gymdeithas yn cefnogi uchelgais y Cynllun o "gwrthdroi'r dirywiad mewn bioamrywiaeth a sicrhau manteision parhaol i gymdeithas drwy wella cadernid ein hecosystemau, drwy ganolbwyntio ar reoli adnoddau naturiol yn effeithiol" ynglŷn â'r nodau arfaethedig a'r dull o weithredu a amlinellir yn nhudalen ii) o'r Crynodeb.
- Noder nad yw'n bosib i'r Gymdeithas paratoi sylwadau manwl oherwydd cyfyngiadau amser a chyfundrefn y Gymdeithas.
- Yn ychwanegol, mynegodd rhai aelodau o'r pwyllgor eu hanfodlonrwydd am y diffyg rheolaeth a fu ar rai safleoedd dynodedig yn y gorffennol a bod angen gwella'r sefyllfa yn y dyfodol er mwyn sicrhau llwyddiant i'r Cynllun.

Yn gywir

Tom Jones

Cadeirydd Cymdeithas Edward Llwyd

Chris Taylor

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

**biodiversity@wales.gsi.gov.uk**

Dear Welsh Government,

### **Nature Recovery Plan**

The diversity and richness of nature in Wales is amazing and is a constant source of joy to many. However, nature is in trouble as we are continuing to see declines in the wonderful wildlife we have in Wales including both rare and common species.

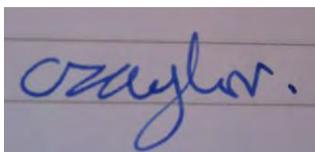
Therefore, as a supporter of the Wildlife Trusts, RSPB, WWT, I am pleased that the Welsh Government is working towards a Nature Recovery Plan. However, I have some concerns that that the plan will not be as effective as it could be at halting the loss of nature and creating Living Landscapes and Living Seas.

Therefore, I would like to see:

- The intrinsic value of nature placed at the heart of the plan.
- The inclusion of a fully resourced action plan that will enable the recovery and to give greater recognition to species and habitat restoration and enhancement.
- The plan enabling the better management of our most precious sites including the Local Wildlife Site system. These sites need to be bigger, better and more connected.
- The restoration and enhancement of our seas.
- The recovery of nature to be requirement on all public bodies in Wales.

Thank you for giving me the opportunity to comment on this plan. I hope that you will consider my feedback.

Yours faithfully,



Chris Taylor

*Responses to consultations are likely to be made public, on the internet or in a report. If you would prefer your response to remain anonymous, please tick here:*

Ref. 0049

*Gordon Parfett*

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Welsh Government,  
Biodiversity & Nature Conservation,  
Rhodfa Padarn,  
Llanbadarn Fawr,  
Aberystwyth,  
Ceredigion,  
SY23 3UR.

24th November 2014

Dear Sirs,

The RSPB has asked its Welsh membership to respond to the public consultation on the Welsh Government's proposed Nature Recovery Plan and Environment (Wales) Bill.

I would like to endorse the comments of the RSPB as they are presented in the attached sheet and would like to add that I hope that the proposed policy plan and legislation will include serious attention to the control of carbon emissions.

Also attached is a copy of a recent article on carbon emissions which appears to go well beyond what we have been accustomed to.

Yours faithfully,

  
Gordon Parfett, Mr.

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Welsh Government

Biodiversity & Nature Conservation Branch  
Aberystwyth.

28 NOV 2014

Dear Sir/Madam

Public Consultation re: Nature Recovery Plan  
and Environment (Wales) Bill

The above mentioned proposals show a lack of leadership and true commitment to solving the acute decline in the biodiversity of Wildlife in Wales. They amount to a re-jigging of existing policies and plans in order to give the appearance of progress.

In order to be truly effective the Nature Recovery Plan must include a fully funded plan of action to restore threatened Wildlife and create space for Nature. If it doesn't then it's a waste of Time and Taxpayer's precious money.

The Environment (Wales) Bill needs to set long-term legally binding targets for Nature's recovery and make it a duty of all Public Bodies to further the conservation and enhancement of biodiversity.

Yours sincerely

Ray Chester

27th November 2014



28 NOV 2014



Biodiversity and Nature Conservation Branch,  
Rhodfa Padarn,  
Llanbadarn Fawr,  
Aberystwyth,  
Ceredigion,  
SY23 3UR.

Re: The Environment (Wales) Bill. Nature Recovery Plan.

Dear sir/madam.

Delighted to know that the Welsh Government is putting together a 'Nature Recovery Plan'.

The State of Nature report published in May 2013 showed an alarming decline in the natural environment. Such a 'Nature Recovery Plan' as mooted by the Welsh Government is vital for Nature's, and our own well being.

However, it is necessary to put action into the ideas as stated. To implement these, money needs to be invested for the plan to succeed. Such things as making special wildlife sites larger, and allowing for corridors of connectivity between them, and taking strenuous steps to stop, then to reverse the alarming loss of certain species.

All these steps will require scientific monitoring, not only to measure the problem fully, but also to monitor progress with time.

There is a very troubling project on the horizon. This is the proposed M4 relief road between Newport and Cardiff. Its route would take it through much unspoiled natural countryside that supports many species of wildlife. (plants and animals) To go ahead with this is surely at odds with the 'Nature Recovery Plan'. Although we are assured any damage to nature will be made good, that is a specious argument. Once it's gone, it's gone.

The Environment (Wales) Bill needs teeth to make the proposals work. Long term legally binding targets need to be enshrined in law, and all public bodies involved in nature, however small that involvement may be need to understand the importance, indeed the enormity of furthering the conservation and enhancement of biodiversity. In fact, it is the duty of all.

Yours in hope,

A handwritten signature in cursive script that reads "Godfrey Bradshaw".

Godfrey Bradshaw.

REF: 0052

Mr & Mrs Richard Smith

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[REDACTED]  
[REDACTED]  
[REDACTED]  
Tel no: [REDACTED]

E-mail: [REDACTED]

26<sup>th</sup> November 2014

Biodiversity and Nature Conservation Branch,  
Rhodfa Padarn,  
Llanbadarn Fawr,  
ABERYSTWYTH,  
Ceredigion,  
SY23 3UR.

Dear Biodiversity and Nature Conservation Branch,

**Re: CONSULTATION on NATURE RECOVERY PLAN**

We are writing in response to the Welsh Government's Nature Recovery Plan consultation.

We have read and considered the consultation document and welcome most of its content. We are pleased to see several positive and essential ingredients including the proposal to integrate plans and policies to join up the different ways that different stakeholders work across the environment in Wales.

This is however, one huge lacuna. No matter how well intentioned is "good effective natural resource management", it is just not measurable or understandable to most "people in the street". Although most of the words, sentiments and ideas throughout the plan are very welcome indeed, there is no hard visible evidence of a willingness to do specific things which could easily make a significant difference to both trust and confidence in these words, sentiments and ideas. To succeed, there must be a real commitment to implement certain actions, which self-evidently will benefit functioning ecosystems and recovery of biodiversity.

Common sense examples include:

- Mechanical flailing of hedges annually, which wastes precious fossil fuel and damages ecosystem functioning around those hedges, eliminating the winter life-stages of Brown Hairstreak butterflies and many invertebrate species and natural fruit, berry & seed supply to Welsh birds and small mammals. Only roadside hedges need to be cut annually. There is scientific study available to show economy & sustainability of longer rotation and trimming intervals for field hedges. Organic farmers adopt it, so there is no ecosystem reason why other farmers should not do the same. Our countryside is needlessly stripped of vegetation every winter, at considerable cost to farmers, who are subsidised to carry it out unnecessarily, taking away obvious wildlife corridors and damaging ecosystems. Cross compliance can easily be changed to stop this arrogant nonsense by recipients of state aid.
- Publicly owned land. Whilst some publicly owned land in Wales is now being brought into the "conservation" portfolio, there is still a long way to go to set a real example. Land prices continue to rise inexorably, but whilst public land is not actively being developed or built upon, it should be made available to achieve nature recovery for species and habitats, however temporarily.

- Agri-environment initiatives to be credible should be in the public domain, so that we can all see where biodiversity species and habitat gains and losses are taking place and feel confident that everyone involved is working to these ends.

We fully appreciate that Welsh Government funding resources are under severe pressure at the present time and that cuts are inevitable, which is why it makes absolute sense to pledge to deliver some measurable initiatives, like those listed above. A more sustainable hedge management approach costs nothing in funding and in fact will save huge resources. If stakeholders like farmers are to receive subsidy but be expected/allowed to maintain their hedges, as funders you MUST set conditions by which activities of those in receipt of funds are guaranteed both sustainable, respectful of ecosystems and in support of your Nature Recovery Plan.

Yours sincerely,



RP. Mr & Mrs R G Smith

30<sup>th</sup> December 14

REF 0053

02 DEC 2014

Carl Sargeant  
Natural Resources Minister  
Biodiversity & Nature Conservation Branch  
SY 23 3UR.

Dear Sir,

Firstly I was pleased to learn you are preparing a Nature Recovery Plan, I believe we have a wonderful wildlife/natural resource here in Wales, but government is good at drawing up plans, not so good at implementing them - action now is essential.

It is important to consult the experts in the field and draw up plans that will be fully planned & funded from the outset, monitoring sites over a full range of species & habitats.

Legally binding targets are essential to reverse declines in nature, making it a duty for all public bodies.

I have seen great improvement in the S. Wales valleys over the last 10 years; & more & more people think nature is a wonderful resource that needs to be treasured & protected at all costs.

It is now up to Government to implement definite strategies to protect & halt any declines in our wonderful natural resource.

I hope you will undertake/oversee this important task.

Yours faithfully,  
L. Jones