



Welsh Government Consultation Responses

Development of the Natural Resources Policy

July 2017

**Consultation
Response
Form**

**Consultation to inform the development of the Natural
Resources Policy**

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From Director Institution of Civil Engineers Wales Cymru

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Submitted electronically

25th November 2016

I would like to thank the Welsh Government for the opportunity to take part in this consultation.

Yours sincerely / Cofion Cynnes

Keith Jones
Director ICE Wales Cymru

Notes:

The Institution of Civil Engineers (ICE) was founded in 1818 to ensure professionalism in civil engineering.

It represents c91,000 qualified and student civil engineers in the UK and across the globe and has over 3,600 members in Wales

ICE has long worked with governments of the day to help it to achieve its objectives, and has worked with industry to ensure that construction and civil engineering remain major contributors to the UK economy and UK exports

For further information visit www.ice.org.uk and www.ice.org.uk/wales

Question: Written feedback on the priority themes and key objectives within them outlined in this document would be welcome as part of this consultation exercise. In particular, taking into account the legal framework and its requirements as outlined in this document, it would be helpful to receive contributions on:

- the key steps that need to be taken in order to deliver on the priority themes and address the key challenges; and
- the barriers that need to be addressed.

Response:

- The legislation interface should include the Active Travel (Wales) Act 2013 and relevant Primary UK legislation including:
 - Environment Act 1995
 - Environmental Protection Act 1990
 - Wildlife and Countryside Act 1981
 - Climate Change Act 2008
 - Planning and Energy Act 2008
 - Energy Acts 2008, 2010 and 2011
- The Policy should make reference to and feed into the Welsh Infrastructure Investment Plan (WIIP) and the proposed Infrastructure Commission for Wales
- Developing the Natural Resources Policy, the main / Key Challenge is the Risk of Flooding but add 'Protecting the natural environment of Wales'.
- Consideration should be given to the economic benefits of Wales' unique assets e.g. water and mineral supplies.
- Natural – based solutions should explicitly be mentioned together with Sustainable Drainage Systems (SuDS).
- There is an opportunity for landscape scale approaches to be made which should include benefits for Flood Risk Management
- Consideration should be given to the benefits of existing hedgerows – both the management and maintenance - including proactive replacement and provision of the resources.

Anonymous response

To whom it may concern

I am responding to this consultation as a member of public who is passionate about the delivery of green infrastructure, especially 'bio-solar roofs'.

I feel positive that the consultation mentions the role that green roofs can play in '*Delivering nature-based solutions to improve resilience and the benefits derived from natural resources*'. However, I fear that this may be rhetoric and that any Natural Resources Policy will not necessarily result in the greater take up of green roofs in our built environment. My response therefore suggests a way that this might be done.

Cities in North America and certain countries in the EU are leading the way in ensuring the better utilisation of their roof spaces. In recognition of this, the London Plan (2008, edition 2) included policy 5.11, this requires major development proposals to consider the use of a green roof and/or wall where feasible. It also suggests that London Borough's may wish to develop more detailed policies of their own. The policy is backed up by supplementary guidance relating to the construction of green roofs and walls as well as ensuring biodiversity benefits.

The London Plan policy places only an 'expectation' on developers to deliver green roofs and walls. Unfortunately there are no compulsory policies/regulations nor a strong culture around green roofs that exists in most parts of the UK, including Wales.

I therefore suggest that Wales acts as a trailblazer in changing the delivery of green roofs and walls not only in the UK, but throughout the rest of the world, by beginning a consultation on the amendment to building regulations in Wales. A starting point could be to use the City of Toronto's green roof bylaw that was introduced in 2010, the first of its kind in North America, and perhaps amend it to satisfy the Welsh context. Solar panels should be added also, hence the term 'bio-solar roofs'. Such a regulation should also align with any future amendment of Part L of building regulations that require houses to generate an element of renewable energy.

The suggested bio-solar roof regulation for Wales is located in box 1 below;

Box 1

Every building or building addition constructed with a gross floor area of 2,000 square metres or greater shall include solar panels and a green roof and/or green wall with a coverage of available roof/wall space in accordance with the following chart:

Gross Floor Area (Size of Building)	Coverage of Solar Panels/Solar Thermal System	Coverage of Available Roof/Wall Space
2,000 – 4,999 m ²	20%	20%
5,000 – 9,999 m ²	30%	30%
10,000 – 14,999 m ²	40%	40%
15,000 – 19,999 m ²	50%	50%
20,000 m ² or greater	60%	60%

A bio-solar roof building regulation, along with other initiatives, is key to making Wales a more resilient country as it satisfies two of the priority themes. It could also be argued that the regulation would satisfy the third priority as green roofs and walls enhance a persons sense of place. The regulation will also satisfy other policy documents of the Welsh Government, such as paragraph 12.9.7 of Planning Policy Wales that concedes:

‘The potential for the development of renewable and low carbon energy development within urban/brownfield sites remains largely untapped.’

The current non-statutory sustainable drainage standards for Wales are not strong enough and need to be made statutory alongside a bio-solar roof building regulation. In doing this the risk of flooding will be reduced, water quality will improve, habitat connectivity will be increased, air quality will improve and the opportunities for urban greening will be realised.

There will be many in the construction industry who will resist such an approach. It is generally in their DNA to seek simple homogenous solutions to the challenges they face, so it is only through the suggested regulation that roof-level habitats and improved biodiversity in Wales can be delivered.

I consider the regulation to not be overly onerous and possible fears could be allayed by a small but strong group of environmental professionals that already exist in Wales, along with help from other professionals in the London region who played such a key role in the London Plan green roof policy. This would be further enhanced due to London playing host to the European bio-solar roof conference in September 2015, this was the culmination of an EU funded project that aimed to expel the myth that the delivery of solar and green roofs was an either/or situation.

What especially needs to be communicated is that although this regulation would result in an initial additional cost to developers and there is potential for unintended consequences, there is increasing evidence that greener and more sustainable buildings mean improved occupancy rates and that such a regulation will result in the creation of green jobs, the Toronto regulation resulted in the creation of 125 full time jobs.

This regulation also has the potential to gather cross party support from Plaid Cymru, page 135 of their 2016 Welsh Assembly Election Manifesto proposes to introduce green roofs as part of building regulations on new homes. However, green roofs on new homes are not considered an appropriate idea at present.

I hope that you will give serious consideration to my suggestion as I consider bio-solar roofs will play a major role in the construction of our built environment in the future.

Yours faithfully

Anonymous.

Please make phasing out of fossil fuel use the foundation of your policy, with an absolute commitment to rapidly reducing extraction of new fossil fuels.

The only way to reduce fossil fuel burning with certainty is to not extract it, and the only fossil fuels we can not extract are our own.

Also ensure that everyone has the right to produce energy from natural sources if they are able to, wherever they are without let or hindrance, if the energy is equivalent to that required to meet their own needs. This should be recognised as a similar right to the right to produce food for their own consumption without let or hindrance.

Thank you. Apart from the above two policies, everything else is peripheral.

Vicky Moller, Cilgwyn Community Group etc

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Rwy'n croesawu ebyst yn y Gymraeg a'r Saesneg

Natural Resources Policy development

Page 1: Submit your response

Q1. You are about to submit your response. Please ensure you are satisfied with the answers you have provided before sending.

Name	Mrs G Brine
Organisation (if applicable)	-
Phone number	-
Address	Rhydcymerau, Carmarthenshire
	-

Q2. If you want to receive a receipt of your response, please provide an email address.
Email address

No Response

Q3. Written feedback on the priority themes and key objectives within them outlined in this document would be welcome as part of this consultation exercise. In particular, taking into account the legal framework and its requirements as outlined in this document, it would be helpful to receive contributions on: the key steps that need to be taken in order to deliver on the priority themes and address the key challenges; the barriers that need to be addressed.

The Natural Resources Policy Statement says that more energy will be generated, stored and used locally, reducing pressure on the grid. Clarity is needed about how this can be achieved: local grids? using small hydro schemes to store water to release when power is needed?

It says that the scale at which communities develop and invest in local energy schemes will be increased. Clarity is needed. Does this mean larger-scale developments? Or does it mean more communities? Or more selling of shares? The difficulty that needs addressing is the lack of financial protection for communities and individuals and non-regulation of the organisations involved. There are no guarantees on financial returns, nor that they will be used to meet local priorities of those communities that are most impacted.

The phrases "community benefit" and "community ownership" are over-used and lack any kind of clear definition. At the moment, they are providing a licence to print money for so-called energy co-operatives, which are set up as part of a pyramid structure, with a few key individuals at the top of the pyramid benefiting disproportionately, while the citizens most impacted have no representation.

A key challenge that needs addressing is ensuring due diligence in the handing out of funding (from European programmes or from the Welsh Government). At present, there is insufficient scrutiny and a poor return on investment. There is very poor involvement of local citizens and/or the taxpayer. Wales remains second-class compared to England where Planning Policy has been improved (under Greg Clark) to recognise that local people need to be properly involved and that schemes need to be adjusted to gain community acceptance. Protests will gain strength and momentum if the Welsh Government persists in ignoring local democracy - particularly the overwhelming disregard shown to LPAs and their local knowledge and their planning decisions by the (unelected) Welsh Planning Inspectorate.

There are many barriers to fulfilling the pledge to "create an efficient process to ensure the right development is located in the right place." For a start, applications for developments are coming forward in an ad hoc manner, with no strategic zoning and no direction as to better positioning or design. LPAs are making planning decisions without the relevant Supplementary Planning Guidance and without Landscape Capacity Studies. Small schemes are being positioned in such a way as to effectively block bigger and better schemes; there is a smattering of schemes without due regard to the spreading and all-pervasive cumulative effect. A Strategic Planning Panel is proposed, but there is no explanation of how this will be established or operate or what democratic input there would be.

In particular, the consultation to inform the development of the Natural Resources Policy emphasises the "key role" that energy efficiency measures will have in reducing energy poverty. However, the continued and growing reliance on "community based energy schemes" works against this, as developers are being allowed to interpret these as schemes which are "community" in name only, with profits going outside the host community, and with no reduction in energy bills within the community or direct cheap energy supplies to those most in need. "Community" should mean those impacted by the development, not people somewhere in the same county or "membership" from across the UK.

Q4. If you have any related issues which we have not specifically addressed, please use this space to report them:

There is no overall strategy that considers whether the renewable energy aims can be met by a continued and growing reliance on small-scale schemes. If the amount of energy needed is divided by the average output achievable by each scheme, it will become clear that there would need to be energy schemes built in close proximity to one another across the whole of the land mass of Wales. Compare this to the amount of energy that can be produced by larger-scale schemes, such as the tidal lagoon, and it becomes clear that one scheme of this scale can obviate the need for hundreds of smaller ones, not least because smaller schemes tend to have a poor output for their size whereas large schemes can produce not just a multiple, but exponentially more output. These schemes could be positioned where energy resource is most needed and consumed - instead of in the countryside where it is not needed and then transmitted inefficiently through miles of "leaky" and over-stretched grid infrastructure.

So Wales is scarring its environment and its landscape resource far and wide for little gain and with no logic. This needs to stop. Proper benefit analysis could overcome this. But LPAs have their hands tied - not least by the appeals process - and have not been provided with the appropriate cost-benefit analysis guidance and/or skills.

And why does Wales persist in considering the grid capacity separately from each renewable energy scheme? This makes no sense. Energy is being produced which cannot make it into the grid. Energy storage is mentioned. This should be required at each EXISTING energy scheme where grid capacity is lacking, BEFORE any further schemes are consented - because many more schemes may not be needed once the storage and distribution is properly addressed.

Q5. Responses to consultations may be made public. To keep your response anonymous (including email addresses) tick the box.

No Response



Ein cyf/Our ref: NRW17-019

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13 February 2017

Natural Resources Wales' Response to the Welsh Government Consultation to inform the development of the Natural Resources Policy

We welcome the opportunity to contribute to the development of the first statutory Natural Resources Policy (NRP). The policy will play a critical role in shaping the work of NRW as we continue to transform our organisation to embed the new ways of working defined in the Welsh legislation.

The Policy is central to the preparation of Area Statements led by us but underpinned by collaboration with partners and stakeholders across Wales. It will also inform our corporate and business plans in the years ahead. We have welcomed involvement in the various stakeholder events run by Welsh Government to inform the development of this national policy.

The referendum result changes the strategic context within which this policy must operate. We believe that the Welsh legislation, enshrined in the Well-being of Future Generations (Wales) Act (2015) and the Environment (Wales) Act 2016, provides a strong foundation to build:

- the resilience of our natural resources and ecosystems;
- strong and healthy communities, protected from hazards such as climate change, flooding and poor air quality; and
- a green economy supporting viable incomes for families across Wales.

To realise this ambition, it is critical that all sectors across Wales break from their traditional silos, and look for opportunities to build new alliances and networks. We are committed to playing our part through:

- actively seeking out opportunities to build new approaches through our role on Public Services Boards, challenging the status quo to maximise the collective contribution across the Well-being Goals;
- leading the preparation of Area Statements, actively reaching out to partners and stakeholders to build joint evidence on the risks and opportunities in a particular place

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Croesewir gohebiaeth yn y Gymraeg a'r Saesneg / Correspondence welcomed in both Welsh and English.

and together identifying the priorities to be taken forward through the work of NRW and others;

- sharing our evidence, information and expertise with partners to define the challenges and jointly build solutions which maximise the contribution across the Well-being Goals;
- working with other regulators to ensure that the new ways of working to deliver wider public benefits are fully recognised, for example the role of the water industry in supporting changes to land management; and
- leading discussions with sectors on applying the new ways of working in practice, discussing any implications for regulation and the potential use of experimental powers.

This will be at the heart of NRW's Well-being Objectives which will be published on 31st March in our Well-being Statement and new corporate plan which will be published in summer 2017.

We have set out our full response to the consultation document in Annex 1. The legislation states that Welsh Ministers must draw on the evidence in SoNaRR in the preparation of the Natural Resources Policy. We recognise that this consultation document provides a line of sight to most of the opportunities and issues reported in SoNaRR. In finalising the first statutory Natural Resource Policy, we believe there are a number of issues to address:


- making a more explicit link to the marine environment and the Wales National Marine Plan, including the priorities for the sustainable management of the marine resources set out in SoNaRR and the Wales Marine Evidence Report;
- to create a co-ordinated fit-for-purpose funding model for SMNR that is owned by all stakeholders, not just by Welsh Government or NRW;
- giving a clear commitment to developing Payment for Ecosystem Services schemes that will support delivery of SMNR outcomes, with a clear statement of the role of Welsh Government and NRW in supporting such schemes;
- making a clear commitment for the policy intent to be tracked through into changes in supporting advice and guidance across a range of sectors. It would be helpful if the NRP could set out the Government's policy intentions and the supporting timeline for this work. We believe this is particularly critical in terms of water company resource and investment planning, development planning guidance, and wider land management and land use, especially forestry; and
- making a clearer distinction between the "what", "why", "how" and "with who" when describing the challenges and priorities to facilitate the development of Area Statements which need to focus on providing the supporting evidence base and creating the networks that can help to develop spatially relevant, joint solutions to these challenges as appropriate. This clearer distinction would also help to clarify the roles of other organisations and therefore provide an imperative for organisations to engage in the

area statement process, either as evidence providers, or as customers / users of the information.

We, collectively across the Welsh public, private and third sector, are at the start of the journey to further the sustainable management of natural resources. If we are to realise the opportunities identified in SoNaRR we need to build trust, rapport and understanding between sectors to find the “collective space” where we can build joint solutions which address the shared challenges we all face. It will undoubtedly be challenging. Welsh Government needs to facilitate this step change by supporting, encouraging, and incentivising conversations through and across sectors. This must start with a joined up policy approach across Government departments, stated in the statutory Natural Resource Policy, where competing or conflicting priorities are resolved at source.

If you or your team need any further information or support in finalising the statutory NRP, please do not hesitate to contact Ruth Jenkins or Sarah Williams.

Yours sincerely,



Emyr Roberts

Prif Weithredwr / Chief Executive
Cyfoeth Naturiol Cymru / Natural Resources Wales

Annex 1: NRW response to the consultation to inform the development of the Natural Resources Policy (WG29897)

SoNaRR: An assessment of sustainable management of natural resources

The first statutory SoNaRR was published by NRW in September 2016. It looks at the pressures on natural resources and ecosystems and how we are managing them. It covers the whole of Wales, including Welsh seas to 12 nautical miles. It does this from three perspectives:

- looking at the environmental status of both natural resources and ecosystems (extent, condition and trends) and then, from that assessment, highlighting where the resilience of ecosystems is compromised;
- looking at relationships between ecosystems and the benefits they provide for Well-being. This will help society to understand what is potentially at stake and where opportunities may lie; and
- looking at the ways in which the use and management of natural resources are regulated. To assess whether they are currently being managed sustainably or unsustainably, and identifying “systems failures”. This is where management and human activity have created or are continuing to create negative ecosystem impacts, which present risks for future generations. This will help to identify mechanisms to work with or improve to achieve sustainable management.

The legislation states that Welsh Ministers must draw on the evidence in SoNaRR in the preparation of the Natural Resources Policy. We recognise that this consultation document provides a line of sight to most of the opportunities and issues reported in SoNaRR. Nevertheless, we believe the NRP needs to make a more explicit link to the marine evidence set out in SoNaRR and the Wales Marine Evidence Report, which identified a number of priorities for the sustainable management of the marine environment. In particular, we feel that the role of marine and coastal tourism and recreation and aquaculture need to be considered more fully.

We hope that partners and officials in Welsh Government will have used the time since the launch of the Natural Resources Policy consultation to more fully reflect on the evidence in SoNaRR. We believe that the policy opportunities identified in SoNaRR are the best chance of building the resilience of ecosystems and optimising the benefits for Well-being. These are:

- increased green infrastructure in and around urban areas, (including urban trees and sustainable drainage);
- increased woodland cover and more existing woodlands brought into appropriate management to deliver multiple benefits;
- coastal zone management and managed realignment;

- working within whole catchments to manage nutrients, and maintain, enhance and restore floodplains and hydrological systems;
- better soil management for carbon storage, water quality and continued food production.
- better utilisation of our uplands (mountains, moorlands and heaths) to deliver multiple benefits;
- integrated management of marine ecosystems through a plan-led system that facilitates better understanding of the benefits of marine natural resources and optimises their use

Through the Roundtable debates and consultation events, we recognise there is a cross-sectoral consensus emerging around the importance of the “Welsh Brand” of a high quality environment underpinning the production of top quality Welsh produce be it lamb, beef, fish or timber. These products could be marketed on the basis of a proven sustainable production model, taking into account animal welfare, plant health, worker health and safety and the sustainable management of natural resources. In this context, the promotion of nature-based solutions could help to substantially underpin the “Welsh Brand”. The Natural Resource Policy needs to signpost the central importance of forging this strong policy, driving integration between environmental quality and food markets. The food sector needs to be encouraged, through the Natural Resources Policy and other Government levers, to work with food producers and purchasers to define and support the creation of a single coherent standard for agriculture that drives sustainable management of natural resources.

In addition, there is a real desire to seek opportunities to encourage health professionals to prescribe use of the outdoors as a way of tackling the in health and social care issues such as the rise in obesity and poor mental health across the Welsh population.

Drawing on the evidence in SoNaRR and using the new Welsh legislation we believe there are now real opportunities to build policy interventions that drive innovative SMNR outcomes. The time is right to start exploring in more detail the kinds of policy interventions which can:

- support profitable and viable businesses across the rural economy where the wider public benefits from sustainable management of natural resources are clearly associated with market value;
- develop a “once in Wales” environmental standard, that sets the performance requirements for all land management sectors in delivering SMNR;
- continue to work on developing a “one-stop-shop” advice service to land managers, which builds on the work already being done under Farming Connect and that builds on the evidence in SoNaRR and in time Area Statements;
- support science and technology to consider different ways of producing food, energy and minimising wastes in the future that support sustainable management;

- support the development of new and innovative products and getting them to market more quickly;
- review public procurement procedures and mechanisms to ensure that the public sector can use its purchasing power to procure Welsh products, especially wood, for schools, hospitals, care homes and prisons. There is a real opportunity for the public sector to optimise its contribution to Well-being by buying produce sustainably grown within Wales and thereby support viable businesses which value and apply the principles of SMNR; and
- refresh centrally defined performance targets for the health and social care sector, to incentivise approaches which are preventative and long-term and thereby encourage health professionals to prescribe outdoor activities which maximise the benefits from natural resources.

There are a range of tools that could support these type of outcomes including the regulatory floor, government funding and behavioural change that together provide the push-pull motivations to move us to where we need to be. NRW is committed to working with all sectors to look at new ways of working with them, including how we regulate and make use of our new experimental powers. As we potentially move away from a settlement where grant in aid (GIA) and subsidy is the primary driver, careful thought needs to be given to how these other mechanisms, some of them novel, can integrate with one another to create a coordinated fit-for-purpose funding model for SMNR that is owned by all stakeholders, not just WG or NRW. A clear expression of the need for such integration would be helpful in the NRP.

Payment for Ecosystem Services (PES) schemes were highlighted in the Natural Resources Policy Statement (2015). We would welcome a clear commitment to developing PES schemes as part of the NRP. This will help to support delivery of SMNR outcomes, as would a clear statement of the role of Welsh Government and NRW in supporting such schemes.

Re-alignment of other areas of Welsh Government Policy

We recognise that the NRP is the first step in aligning Welsh Government policies to the outcomes sought for the sustainable management of natural resources. We would expect the policy intent to be tracked through into changes in supporting the provision of advice and guidance across a range of sectors. It would be helpful if the NRP could set out the Government's policy intentions and the supporting timeline for this work. We believe this is particularly critical in terms of Water Company resource and investment planning, development planning guidance and wider land management and land use.

Water Company resource and investment planning

Water Companies are not classed as public bodies under the Environment Act. We recognise their work to explore innovative approaches, including their work with land managers, as well as the support provided by them to NRW in the development of the Area Statement process and our ongoing work to streamline and simplify existing environmental planning processes. The Welsh Government Guiding Principles for Developing Water Resources Management Plans (WRMP's) for 2020 April 2016 draws the attention of Water Companies' to the principles of SMNR and requires that WRMP's should demonstrate how they have taken into account the Welsh Government's priorities, principles and policy commitments set out in the Well-being of Future Generations (Wales) Act (2015). More generally, NRW are encouraging Water Companies to demonstrate these in the development of their 5 year plans for the periodic review of Water Prices in 2019 and in the development of their long term strategic plans. In developing their investment plans, in addition to meeting their environmental obligations, we want them to consider the multiple economic, social, cultural and environmental services for people, wildlife and the wider environment provided from our natural resources and ecosystems.

NRW will facilitate Water Company engagement with public services through our role on Public Service Boards to help them to realise existing, and seek out further, opportunities and secure commitment from others to ensure that they are delivered. Public services can benefit from their engagement and collaboration in return. We see real benefits here, particularly in enhancing understanding of how economic development is planned alongside strategic investment in sustainable water, sewerage and drainage infrastructure that improves local environments and supports communities. Further guidance to companies on how they should work with PSBs and respond to Area Statements would be helpful.

Development planning guidance

The changes put forward in the Environment (Wales) Act 2016, have yet to be incorporated in the development planning guidance that is currently available. Planning Policy Wales (PPW), the Local Development Plan Manual, Advice Notes and guidance should be updated to provide further clarity to Local Planning Authorities (LPAs) and those involved in the planning process (both development planning (policies and plans) and development management (application/site level)). Without this change the situation is likely to form a significant barrier to the sustainable management of natural resources and the implementation of the NRP.

There should be clear links at the strategic planning level between natural resource management and development planning policy. The Environment (Wales) Act 2016 has gone some way towards this, by amending the Planning and Compulsory Purchase Act 2004 to ensure that LPAs "must have regard to" an Area Statement when preparing local

development plans (LDPs). Similar links would be welcome at the national level between the NRP and the National Development Framework and between the NRP and Strategic Development Plans.

In the interim period and until Area Statements are published; NRW will endeavour to work with relevant parties and the WG to understand the type of additional information, which can be feasibly and usefully captured within Area Statements to make a meaningful contribution to deliver sustainable development through the development planning system. Within this context, the NRP will play a key role in ensuring that Wales can benefit from the significant opportunities that the better management of our natural resources can provide in parallel with addressing the clear challenges we face.

Wider land management and land use

There is a fundamental issue around land management that needs to be addressed in the NRP. By inference, delivering more sustainable land management requires an ‘extensification’ of land use (to accommodate more nature based solutions) whilst the expectation remains that we continue to produce the same amount (or value) of timber or food or even increase output (green growth – see box 1). There will clearly be a need for compromise at least in the short term, recognising there may be a need to intensify elsewhere or accept elements of reduced supply, until such time as we find the more optimal solutions. How we use the land and sea, to support green growth needs to recognise the areas of change needed if we are to deliver SMNR. In developing policy, Welsh Government needs to consider what its fundamental policy objectives are and how they inter-relate and complement each other in driving SMNR outcomes. Policy choices must be explicit so that all delivery agencies, the private sector and communities are aware of the intended outcome. It would be helpful if the NRP could address this area particularly where NRW has a specific role in managing or regulating natural resources such as forestry, agriculture and water.

The Natural Resource Policy: Defining the risks, opportunities and priorities

We recognise the challenge in setting out specific thematic areas for the sustainable management of natural resources (SMNR) where the policy intent is to take an integrated approach. We believe it is critically important that the NRP recognises that the shift to the sustainable management of natural resources will drive change in the use and management of our natural resources on the land and sea. The NRP needs to support this change.

The definition of each of the themes is important and whilst the consultation does try to explain what each theme means, there is a risk that the definitions will not “land” with some sectors and therefore act as a barrier to them engaging in discussions about the opportunities for their sector. As an example, the green growth theme could be interpreted

as not offering any SMNR opportunities for the forest sector as the theme is defined as limiting the use of virgin material. A broader definition of green growth should be encouraging use of timber (substitution) alongside opportunities to maximise the circular economy.

The three themes must be seen as complementary and work together to support SMNR outcomes. We suggest it would be helpful to further refine the three broad themes so as not to confuse the objective of SMNR (what we need to achieve) with the principles of SMNR (how we achieve it through ways of working), and green growth – which is integral to both. For example, the theme in relation to “Delivering nature-based solutions” sets out a range of potential opportunities – such as better soil management and increased green infrastructure. When considering these opportunities there will be a need to consider “improving community and individual Well-being by taking a place and landscape-based approach” – as well as opportunities which might facilitate the “acceleration of green growth...” It is important that these themes work as a holistic package and are not looked at in isolation (see text box 1).

In order to stimulate activity around three themes its essential that the statutory NRP sets out some of the specific opportunities and priorities which Government, business, third sector and public sector bodies might work together to address. But we must guard against being too prescriptive or “solution focussed”, to avoid stifling innovative and creative SMNR opportunities which inadvertently are ruled out from consideration.

In line with the Well-being of Future Generations (Wales) Act 2015 five ways of working, it is critical that each priority is “defined” or “framed” in the right way to really look at the root causes of the problem and the system change required. We suggest that each priority and opportunity is framed more as an “exam question”. There needs to be a stimulus which then supports people coming together to develop innovative, joint solutions.

There needs to be a clear recognition of what the current barriers are to building the resilience of our ecosystems so they can continue to support Well-being now and in the future – and creating the conditions to develop alternative delivery models – applying the principles of SMNR. Challenges exist because it is easier to take short-cuts, or comply with the legal minimum. Behaviour change linked to the objective of SMNR requires making the right thing to do the easiest option. This will require changes in funding models, Government Policy, legislation and regulation. NRW is committed to using the new experimental powers where appropriate to facilitate new models of regulation and delivery – but this will need to be prioritised and targeted.

Box 1: Timber availability, green growth and nature-based solutions

Seizing the opportunity to restructure monoculture coniferous growing stock at felling is at the heart of the UK's approach to sustainable forest management (UK Forestry Standard) and is changing the characteristics and productivity levels of the Welsh forest resource. A broader range of tree species increases resilience to disease and response to climatic change. Preliminary estimates for the areas of clearfell identified at 2006, indicate around 51% was returned to conifer, 18% to broadleaves, 23% was un-stocked transition woodland and 8% was permanent open space (priority open habitat types such as deep peat and creating riparian zones). The restoration of Plantations on Ancient Woodland Sites is likely to lead to a loss of at least 10% of currently forecasted softwood volumes. However, this needs to be considered against the long-term forecasted availability of timber in Wales (and Britain as a whole) which is predicted to continue to increase until the 2030s, but then fall significantly to below the current level with demand outstripping supply.

Green growth requires integrated activity in both the supply and demand chains that use, manage and add value to a natural resource. Green growth in the forest sector requires action to tackle the lack of new productive woodland creation. Levels of contemporary new woodland creation are very low, of small average size and predominantly of native broadleaves targeted for carbon benefit largely to off-set agricultural emissions and environmental improvements on farms in hedgerows, field margins and in-field shelterbelts for water quality, biodiversity and amenity. These woodland types will not compensate for productivity losses due to restructuring of the existing forest resource and nor will it meet the aspiration to increase woodland area to 20% by 2030. Policy support and investment confidence is low for the creation of new mixed or coniferous woodlands more capable of maintaining or increasing the productive capacity of the wider Welsh woodland resource.

Furthermore, stimulating demand for sustainable timber requires local networks. For example, recently in partnership with WoodKnowledge Wales, Powys County Council have launched a Wood Encouragement Policy that seeks to promote the sustainable use of locally sourced timber in construction and development. This aims to improve resilience and the benefits derived from natural resources and create local employment opportunities by using wood as a sustainable construction material.

These examples just illustrate how the three “themes” cannot be considered in isolation but need an integrated approach working across sectors.

Theme: Accelerating green growth by increasing resource efficiency, renewable energy and supporting innovation

Green growth is applicable to all sectors regardless of their dependency on terrestrial, freshwater or marine ecosystems or whether projects are supported on brownfield sites or support growth of ‘blue’ or ‘green’ infrastructure – as long as they follow the principles of SMNR. Further clarification on the scope of the “green growth” theme would be helpful in terms of providing a clear line of sight from SoNaRR, through the National NRM policy and into the forthcoming Area Statements.

Green growth is dependent on the realignment of WG policy frameworks with the NRP as stated above - particularly critical in development planning guidance and other land use change decision making – and the regulatory changes linked to this. It would be helpful if this theme was to clearly express the relationship between land and sea use, land use change, and the improved flow of benefits from our natural resources. We consider that this theme should include not only resource efficiency but also tackle resource change. For example, finding space in which to create new woodland, as highlighted in SoNaRR.

Whilst green growth incorporates topics such as resource efficiency, it remains unclear whether this heading can be used to explore solutions to the problems of diffuse and point source agricultural pollution as well as promoting more effective use of both nutrients and pesticides (see Text Box 2 for an example). Whilst water pollution is mentioned under the nature-based solutions theme, not all of the relevant issues can be addressed under this heading.

Box 2: Innovative slurry management

Focussing on innovative slurry treatment systems could help develop a sustainable approach to utilising the large quantities of nutrients now produced on dairy, intensive beef and poultry farms. Large quantities of manure/ slurry are difficult to transport over long distances, but treated inert nutrients could be traded more easily - potentially replacing some of the bagged fertilisers now being purchased by many upland farms.

In partnership with the Department of Economy, Science and Transport, NRW has utilised Innovation techniques and Rural Development Programme funds to see whether the private sector can approach the problem of slurry management from a new direction. The chosen approach involves passing slurry through a reactor to deliver an inert dry fraction for use as a fertiliser whilst the liquid fraction is returned to the slurry store. A prototype slurry reactor has been deployed at Coleg Sir Gaer in Carmarthenshire and the focus has now shifted to overcoming the remaining technical issues so that the prototype can be adapted for commercial use on a range of typical farms across Wales.

Theme: Delivering nature-based solutions to improve resilience and the benefits derived from natural resources

In essence this theme requires changes to the management and use of our land-based, freshwater and marine natural resources. Management choices that follow the principles of sustainable management of natural resources, are likely to be more or less nature-based in principle. It is important not to prescribe the solutions at the outset, as this may curtail innovation and rule out opportunities. Applying the principles of SMNR will drive this outcome.

There is also a risk that by focussing only on “nature-based solutions” nature becomes “segregated” from rural businesses and other land uses such as forestry and agriculture. SoNaRR has shown how resilient ecosystems are at the heart of Well-being and all seven of the Well-being goals and action is required by everyone.

There are potential unintended consequences of such a focus on nature based solutions. From a flood risk perspective, the NRP appears to focus purely on the natural elements and opportunities for natural flood risk management. The NRP must also be mindful to reflect the range of activities undertaken by flood risk management authorities and the range of actions needed in order to reduce the risk of flooding to people, properties & infrastructure. Reducing the risk and consequences of flooding will never be achieved from natural interventions and land management changes alone. We support a greater emphasis on a catchment management to deliver multiple benefits, including for flood risk in appropriate locations. There are however legislative requirements and national flood risk priorities that must be met when undertaking flood risk management activities. Ideally, the NRP should reflect these basic requirements (such as Capital Funding (GiA) restrictions) that may impede or limit the ability to facilitate landscape scale solutions.

Theme: Improving community and individual Well-being by taking a place and landscape scale approach

This theme provides the approaches we must take to achieve green growth and better management of our natural resources by building consensus at place that adds up to improvement that is felt both locally and nationally. For example, we recognise the role that designated landscapes can play acting as hubs, working beyond their boundaries to develop greater connectivity and landscape resilience.

However, it is important to try to avoid any pre-conceptions about *what* the solutions might be – this can limit innovation, and opportunities may be narrowly defined or miss important considerations about addressing issues in a holistic way. Likewise care needs to be taken around *where* solutions might be found (e.g. setting a scale first). Issues cannot necessarily be resolved by a landscape scale or place-based approach *alone* – there are likely to be national / global and more localised factors at play too. Applying the principles

of SMNR in the thought process, will help to draw out the appropriate scale at which to address these challenges. Other factors such as the historic and cultural association that have helped shape the landscape can also shape and add richness to the proposed solution – in turn encompassing the opportunities for maximising community and individual Well-being.

Role for Area Statements

We suggest it would be helpful for the development of area statements if the NRP made a clearer distinction between the “what”, “why”, “how” and “with who”, when describing the challenges and priorities. Area statements need to be able to focus on providing the supporting evidence base and creating the networks to help develop spatially relevant, joint solutions to these challenges as appropriate (the “where”). This clearer distinction will also help to clarify the roles of other organisations and therefore provide an imperative for organisations to engage in the area statement process, either as evidence providers, or as clients / users of the information.

We, collectively across the Welsh public, private and third sector, are at the start of the journey to further the sustainable management of natural resources. If we are to realise the opportunities identified in SoNaRR we need to build trust, rapport and understanding between sectors to find the “collective space” where we can build joint solutions which address the shared challenges we all face. It will undoubtedly be challenging. Welsh Government needs to facilitate this step change by encouraging, cajoling and incentivising conversations through across sectors. This must start with a joined up policy approach across Government departments, where competing or conflicting priorities are resolved at source.

BACKGROUND

1. Wildlife Trusts Wales (WTW) represents the six Wildlife Trusts in Wales – Brecknock, Gwent, Montgomeryshire, North Wales, Radnorshire and South and West Wales (hereafter referred to as the 'Wildlife Trusts') working together in partnership to achieve common aims. The Wildlife Trusts collectively speak on behalf of more than **24,000 members** and manage over **200 nature reserves**, covering more than **8,000 hectares** of prime wildlife habitat, from rugged coastline to urban wildlife havens.
2. Nature is fundamental to everyday life; it provides the air we breathe, the food we eat, the fuel we use for warmth, and the resources we consume for shelter and modern life. Nature and people are not separate; nor is nature separate from our economy. Without a healthy environment, society cannot be resilient but for nature to look after us, we need to look after nature.
3. The Wildlife Trusts in Wales are all about restoring biodiversity across Wales. We strive for **Living Landscapes** and **Living Seas**, recognising this as an inspirational end point where our environment, society, and economy coexist for the benefit of wildlife and people.
4. Ecosystems in Wales have undergone significant degradation resulting in negative impacts on biological diversity and peoples' health and well-being¹. None of Wales' ecosystems are resilient² and this means their capacity to provide ecosystem services and benefits are severely reduced. Therefore, before we can maximise the benefits from ecosystems we must first restore and enhance them. This requires us to not only have sustainable policies but **ecologically restorative policies** as called for by Professor Terry Marsden³, Sir John Lawton⁴ and Professor Dieter Helm⁵.
5. It is worth highlighting Wales' current baseline, as set out in SoNaRR:
 - The condition of SAC and SPA species features on sites in Wales, as reported in 2013, remains mostly unfavourable (55%),
 - The condition of the most extensive semi-natural habitats of mountain, moorland and heath within SSSIs ranges between 63 and 73% unfavourable.
 - The percentage of SSSI features in unfavourable condition ranged from 12% (flush) to 100% (montane).
 - **none of Wales' ecosystems are resilient** and this means that their capacity to provide ecosystem services and benefits are at risk.
 - Between 2002 and 2008, fewer than half of the species on the interim Section 7 list were considered to be stable or increasing
 - Wales (along with the UK as a whole) did not meet the 2010 international and national biodiversity targets
 - The diversity is declining in Wales, which is shown by loss of habitats and species identified in the State of Nature 2016 report¹
 - 21% of invertebrates were declining,
 - 37% of vertebrates were declining
 - 29% of fungi and lichens were declining
 - 47% of bryophytes feature were declining

¹ State of Nature <http://www.wtwales.org/wildlife/state-nature-2016>

² State of Natural Resources Report <https://naturalresources.wales/our-evidence-and-reports/the-state-of-natural-resources-report-assessment-of-the-sustainable-management-of-natural-resources/?lang=en>

³ Marsden, T <http://blogs.cardiff.ac.uk/sustainableplaces/2016/09/22/brexit-towards-building-a-new-consensus-for-an-integrated-food-and-rural-development-policy/>

⁴ Professor Sir John Lawton - Making Space for Nature <https://www.gov.uk/government/news/making-space-for-nature-a-review-of-englands-wildlife-sites-published-today>

⁵ British Agricultural Policy after BREXIT - Natural Capital Network – Paper 5 - 1st September 2016
<http://www.dieterhelm.co.uk/natural-capital/environment/agricultural-policy-after-brexit/>

6. Ecosystem restoration is a significant part of the Ecosystem Approach (Principle 5 of the Convention of Biological Diversity Ecosystem Approach Principles⁶) and therefore the **sustainable management of natural resources (SMNR)** e.g. in informing the negotiation of land use options and enhancement of healthy ecological networks⁷.

INTRODUCTION

7. The Wildlife Trusts welcome the consultation on the Natural Resources Policy (NRP) for Wales, which is a key requirement under the Environment (Wales) Act 2016. Our response sets out where we see this policy could contribute to the principles of Sustainable Management of Natural Resources (SMNR) and creating resilient ecosystems across Wales. We set out initially what we would expect to see in the NRP and include at the end of this document our response to the questions in the consultation document “key steps that need to be taken in order to deliver on the priority themes and address the key challenges” and “the barriers that need to be addressed”.
8. Whilst we appreciate that the consultation document is supposed to be high level, we want to highlight that the final policy must fulfil the requirements of section 9 of the Environment (Wales) Act 2016. **The core of the NRP should be about maintaining and enhancing the resilience of ecosystems, recognising their intrinsic value and the benefits they provide.** The document needs to recognise the scale and pace/urgency of change as well as the resources required to combat the loss and degradation of ecosystem resilience in Wales. Furthermore, we would welcome the NRP setting out how this policy will translate to other departments. It is crucial that others engage with this policy.
9. **The NRP needs to provide clear policy direction in order for:**
- Ministers to take all reasonable steps to implement the policy, and encourage others to take such steps (as required by sections 9(4) of the Environment (Wales) Act 2016).
 - NRW to prepare and publish statements (“area statements”) for the areas of Wales that it considers appropriate for the purpose of facilitating the implementation of the NRP (as required by sections 11(1) of the Environment (Wales) Act 2016).
10. We have concerns over the process of writing the NRP. There is an impression that the authors have sought to establish what could be done within the current policy context, rather than establishing what is necessary to create resilient ecosystems and working back from that. This links in with the steps set out in the Environment (Wales) Act, stating that the NRP should be based on the findings in the State of Natural Resources Report (SoNaRR) and should inform the Area Statements. Yet the links to SoNaRR are not clear and the process for determining Area Statements has already begun, suggesting the timescales and flow of data are not being taken full advantage of.
11. The need for the NRP to accurately reflect the findings in SoNaRR is crucial. In the foreword, the Cabinet Secretary states that the NRP will build on the opportunities and challenges identified in SoNaRR, but at the NRP Stakeholder events, we were informed that the **Welsh Government Programme for Government** would be the starting point for the NRP. This is not in line with requirements under the Environment (Wales) Act 2016. The Act does state that in preparing or revising the NRP, the Welsh Ministers must refer to the most recent SoNaRR. As such, SoNaRR should be the starting point for the NRP.

⁶ Principle 5: Conservation of ecosystem structure and functioning, in order to maintain ecosystem services, should be a priority target of the ecosystem approach. Ecosystem functioning and resilience depends on a dynamic relationship within species, among species and between species and their abiotic environment, as well as the physical and chemical interactions within the environment. **The conservation and, where appropriate, restoration of these interactions and processes is of greater significance for the long-term maintenance of biological diversity than simply the protection of species.** <https://www.cbd.int/ecosystem/principles.shtml>

⁷ IUCN - Ecosystem Restoration <https://www.iucn.org/commissions/commission-ecosystem-management/our-work/cems-thematic-groups/ecosystem-restoration>

12. The omission of the marine environment within the consultation document is particularly conspicuous. This is unacceptable as the marine environment almost doubles the size of Wales and is just as significant as the terrestrial environment. The Marine Plan should not be seen as a substitute for the inclusion of marine measures.
13. There needs to be an opportunity to comment on the draft policy before the final iteration produced in March. We would also welcome the opportunity to discuss our comments in more detail with the Welsh Government and to work with officials on the actual policy itself.

REQUIREMENTS SET OUT UNDER THE ACT

14. The requirements set out in section 9 of the Environment (Wales) Act for the NRP are:
 - (1) *The Welsh Ministers must prepare and publish a document setting out their **general and specific policies** for contributing to achieving sustainable management of natural resources in relation to Wales (the “national natural resources policy”).*
 - (2) *The national natural resources policy must set out what the Welsh Ministers consider to be the **key priorities, risks and opportunities** for sustainable management of natural resources in relation to Wales, including what they consider should be done in relation to **climate change and biodiversity**.*
15. Based on these requirements, we would expect the NRP to be based clearly around: **policies, priorities, risks and opportunities** for SMNR. At the end of our response we provide some suggested risks, priorities and opportunities to address the key challenges.
16. What Welsh Government considers should be done in relation to **climate change and biodiversity** is a requirement for the policy as set out in the Environment (Wales) Act 2016 (and WFG goals), yet there is little mention of climate change and even less of biodiversity. Biodiversity and climatic features and processes are two of the six natural resources identified in the Environment (Wales) Act and should be prominent features of the NRP.

Policies and Priorities

17. The **general policies** presented in the consultation document **are not focussed on the SMNR**, i.e. section 3(2) of the Environment (Wales) Act 2016 “*maintaining and enhancing the resilience of ecosystems and the benefits they provide*”. Our main concerns around these themes are that they:
 - are **anthropocentric** and seem to be focussed on opportunities and trying to integrate across Government priorities. The consultation document does not mention ‘intrinsic value’ as stated under 4(f) of the Environment (Wales) Act 2016
 - do not provide clear guidance on how to achieve SMNR or what magnitude of impact is expected (‘accelerate’ and ‘improve’ are subjective and open to misinterpretation).
 - are not clear on how the general and specific policies will contribute to achieving SMNR.
18. We therefore recommended that along with Green Growth, Landscape Approach and Nature Based Solutions, the actual restoration of resilient ecosystems should also be a key priority. Also ‘Landscape Approach’ should be changed to ‘**Ecosystem Approach**’, as this will allow the consideration of the marine environment and fit present policy language in Wales.
19. The document appears to suggest that natural resources should be maintained and enhanced in order to benefit human resource consumption. Our current system is based around a culture of using resources to their maximum without causing total loss, and defining this as sustainability. We need to address the issue that currently, proposals have to demonstrate whether they will cause harm, rather than whether they are necessary or if there is an alternative which has less risk. We recommend that the wording of the Policy makes it clear that species and habitats, in particular the Section 7 species (Environment (Wales) Act), are recognised for their intrinsic worth, and that any action which risks causing negative impacts should be questioned as to whether there is a need and what the alternatives are.

20. We recommend that **the priorities should focus on the needs of Wales' ecosystems**. The document could then outline how the policies contribute to maintaining and enhancing the resilience of ecosystems. It could also include how this can feed into the four priority areas in Welsh Government's current Programme for Government, Taking Wales Forward:
- prosperous and secure;
 - healthy and active;
 - ambitious and learning;
 - united and connected
21. Maintaining and enhancing the resilience of ecosystems and the benefits they provide should be the central aim of the NRP. This needs to be clearly stated as the top priority. The Policy should then identify how resilience will be achieved upfront (rather than in an Annex), specifically addressing each of the four attributes of resilience where possible. The aspects of resilience, as defined in the Section 4(i) Environment (Wales) Act 2016, are:
- *diversity between and within ecosystems;*
 - *the connections between and within ecosystems;*
 - *the scale of ecosystems;*
 - *the condition of ecosystems;*
 - *the adaptability of ecosystems*
22. We believe that the policies identified within the Environment Strategy for Wales (2006)⁸, whose foreword was provided by the current First Minister, would also provide a useful basis for the NRP policies and priorities. The Environment Strategy for Wales was subject to huge stakeholder involvement and consultation and therefore provides an excellent starting point. This is especially important as:
- many of the fundamental drivers of ecosystem degradation have not been adequately addressed
 - it includes opportunities such as halting the loss of biodiversity by 2010 and having all our designated sites in favourable condition, which have not been achieved.
23. The NRP was preceded, and should be informed, by SoNaRR. Priorities should therefore be linked to those in SoNaRR, which identified that *"all habitats have problems with all four attributes of resilience"*. SoNaRR highlights the following priorities:
- **Lowlands, particularly lowland grassland:** *"Of the lowlands 17.3% is semi-natural habitat, whereas of the upland area 84% is semi-natural"; "The extent of lowland semi-natural grasslands has decreased dramatically since the 1930s, an estimated 91% was lost in Wales between the 1930s and 1990s. Dry lowland grassland habitat has been particularly badly affected, with an estimated 97% decline in that period, so that, for example, only 1,600 ha of unimproved neutral grassland remain"; "Semi-natural lowland grasslands have become highly fragmented in most areas". Only 43% of lowland grassland SSSI features are in favourable condition, and only 31% of lowland calcareous grassland*
 - **Mountains, moorlands and heaths:** *"The condition of the most extensive semi-natural habitats of mountain, moorland and heath within SSSIs ranges between 63 and 73% unfavourable. The overall assessment of the conservation status of the 15 Annex I habitats associated with mountain, moorland and heath is either bad or inadequate."*
 - **Marine:** *"Historically, the marine environment around Wales has suffered significant habitat loss, with key examples being coastal habitats (particularly saltmarsh) and subtidal native oyster beds"; "Only 3 of 22 Shellfish Waters met guideline quality standards in 2014"; "Important and sensitive habitats such as Maerl, *Modiolus modiolus* (horse mussel) beds, tidal rapids and sublittoral sands and gravels were all reported as declining in condition in 2008"; "The extent of both sandbanks and reefs was found to be declining over the short (2001-2012) and long (1989-2012) term in Wales."*
24. **We would therefore suggest that these should be identified in the NRP for restoration as the top priorities.**

⁸ Welsh Government (2006) Environment Strategy for Wales www.wlga.gov.uk/download.php?id=3972&l=1

Opportunities and Risks

25. Opportunities from SoNaRR are presented in the NRP consultation document but seem to have been added in following production of the document rather than being the basis upon which the report is built. SoNaRR provides a valuable evidence base in determining how SMNR, and maintenance and enhancement of ecosystem resilience, can be achieved. This includes addressing the direct and indirect drivers of changes as highlighted in Chapter 2 of SoNaRR.
26. The NRP consultation does not clearly define risks. There is a risk register within SoNaRR which identifies risks to resilience which have not been adequately translated into the NRP. For example, SoNaRR very clearly identifies the significant risk posed by climate change and the risk posed by insufficient data, neither of which are in the current consultation document.

SUBJECTIVE WORDING

27. The target audience of this policy document should be the public bodies and their partners as defined in the Environment (Wales) Act 2016 and the Well-being of Future Generations (Wales) Act 2015. The wording therefore needs to be much more specific and less subjective. Words such as 'better', 'increased', 'more' and 'improved' do not give those implementing the policy a clear steer to the magnitude of the change they need to effect. This document is not intended for the general public but for professionals within public bodies. As such, wording does not need to be too simplistic and should avoid being too ambiguous. If necessary, a separate document should be produced for the public.

STATE OF NATURAL RESOURCES REPORT (SoNaRR)

28. Section 8 of the Environment (Wales) Act states that NRW must produce a State of Natural Resources Report or **SoNaRR** which was published in September 2016. Each report must, among other things, set out:
 - NRW's assessment of the extent to which sustainable management of natural resources is being achieved;
 - NRW's assessment of biodiversity (including the living organisms and types of habitat included in any list published under section 7);
 - what NRW considers to be the main trends and factors that are affecting, and are likely to affect, the state of natural resources;
 - any aspects of the state of natural resources about which NRW considers that it does not have sufficient information to make an assessment
29. **Links to SoNaRR do not seem to permeate the current consultation document.** SoNaRR is mentioned and while some opportunities from **SoNaRR** are included it seems to be a late addition to the document rather than being the basis upon which the report is built. It is vital that the findings in SoNaRR are the basis upon which the NRP is written, with the finding that '*all habitats have problems with all four attributes of resilience*' a significant starting point. We would welcome greater transparency on how the findings in SoNaRR are transposed into the policy document. This should be clear to stakeholders. The NRP should also address the direct and indirect drivers of change as highlighted in Chapter 2 of SoNaRR, as well as opportunities.
30. While SoNaRR provides a valuable evidence base, we would highlight that there are some gaps in SoNaRR, particularly around the impacts of commercial forestry or coniferous forestry to the degradation of ecosystems such as:
 - impact on peatlands and other soil types
 - release of carbon into the watercourses (i.e. Dissolved Organic Carbon) and the air
 - acidification of watercourses
 - the impact of the pesticide Cypermethrin, which is highly toxic to fish, bees and aquatic insects
 - conifer self-seeding on peatland from neighbouring plantation forestry i.e. the Berywn SSSI⁹

⁹ Restoring moorland in the Berwyn Mountain range <https://naturalresources.wales/about-us/news-and-events/news-releases/restoring-moorland-in-the-berwyn-mountain-range/?lang=en>

31. This highlights an issue that one part of NRW (i.e. ex Forestry Commission) are causing significant issues including financial problems for the other parts of NRW (ex. Environment Agency and Countryside Council).
32. SoNaRR points to problems around paucity of data – this is a particular problem in the marine environment and for the features of terrestrial protected sites such as SSSIs, for example. If we are to improve our ability to deliver SMNR we need to address data deficiency; therefore, filling some of these gaps in our knowledge between now and the next SoNaRR should be identified as a priority in the NRP.
33. NRW, academic institutions and the third sector need additional resources to produce a robust SoNaRR in the future, therefore investment in survey, monitoring and analysis is required.

NATURE RECOVERY PLAN

34. The Nature Recovery Plan outlines a number of objectives to address the issues that are driving the decline in our biodiversity, and to support recovery. This is vital to the delivery of the aims of the NRP. However, the consultation document does not give sufficient clarity on the role and importance of the Nature Recovery Plan in delivering SMNR (as highlighted by SoNaRR). Therefore, we recommend that the final NRP makes it clear that the implementation of the Nature Recovery Plan is a key to delivering the aims of the NRP.

MARINE ENVIRONMENT

35. The NRP must recognise that, before we can “*optimise the use of marine natural resources*”, we must first have improved resilience of marine species and habitats, through the effective implementation of wider marine management tools (e.g. measures under the Common Fisheries Policy).
36. We also need an improved understanding of what SMNR looks like in the marine environment and the NRP should therefore highlight the need for the Welsh Government to prioritise this as part of their Marine Evidence Strategy going forward.
37. We need to acknowledge that marine sites are not in favourable conservation status nor do we have an ecologically resilient network which are both required under the Marine Strategy Framework by 2020. Therefore, increasing our understanding, monitoring and enforcement in the marine environment needs to be recognised. We have concerns that one of the few references to marine includes the role that marine planning has in delivering SMNR. We have concerns as to whether this can deliver SMNR in the marine environment on its own. A marine plan-led system must also be ecosystem-based to ensure that the SMNR principles are applied to decision making. With that in mind, it is fundamentally important that the NRP goes further than just identifying the marine plan as a tool to deliver SMNR. It would be beneficial to highlight (at a high level) what the plan needs to do in order to support SMNR. The NRP should reflect on the fact that:
 - Marine planning in Wales must take an ecosystem based approach (not just plan-led approach) – this is critical to ensure truly sustainable management and is a legal requirement of UK and EU marine legislation, yet reference to this is currently lacking.
 - The Plan must secure policies that enable the sustainable use, maintenance, recovery and enhancement of natural resources.
 - Consideration should be given to how the NRP can support data needs and fill evidence gaps in the marine environment (as recognised in the SoNaRR). Information on the value, extent and health of marine ecosystem services, for example, is currently a huge data gap for marine planners which could significantly impact the ability for the plan to deliver SMNR. NOTE: This could link into and potentially be seen as an opportunity for the development of Area Statements in the future of the marine environment.
38. To enable SMNR, marine planning must also promote the sustainable use of marine natural resources rather than optimised use. With this in mind we strongly recommend the following changes:

“to integrate the management of marine ecosystems through an ecosystem-based plan-led system that facilitates better understanding of the location, health, interdependencies and benefits of marine natural resources which enables their sustainable use.”

SPECIFIC COMMENTS

Section 1

Natural resources and well-being

39. Under section ‘Natural resources and well-being’ the first paragraph includes a list of ‘resources’ which does not include wildlife and landscape. The Environment (Wales) Act lists six different types of natural resources and these should be stated explicitly within the NRP to make it clear that all six are equally crucial for creating resilient ecosystems. Otherwise, there is a risk that natural resources are seen as ‘raw materials’ and ecosystems seen as a way of mitigating the damage currently being done by harvesting them, rather than seeing it as all part of the same thing.
40. Within this section the bullet points highlight a number of challenges which include *“biodiversity, which underpins the structure and functioning of our ecosystems”*. However, biodiversity is not a ‘challenge’ – the challenge is to *“halt and reverse the loss of biodiversity...”*

How our natural resources currently support our key sectors

41. SoNaRR highlights a number of economic figures to show the relative importance of different industries and sectors based on a variety of sources. However, many of the figures mask the actual contributions of the industry or sector. For example, Welsh agriculture is highlighted as contributing to a £6.1 billion annual turnover but this includes Welsh foodservice (i.e. restaurants) and the Welsh food and drink retail market – much of which has little to do with Welsh agriculture.
42. There needs to be a sector by sector analysis of the contribution each makes to the economy, including within NRW. The figures provided in SoNaRR, for example for farming, are very likely not to their ‘net’ contribution that includes their externalised costs. For example, agriculture is by far the greatest sources of diffuse pollution contributing to Water Framework Directive (WFD) failures in Wales¹⁰¹¹. A similar concern is attached to figures on forestry, which suggests this sector is not properly and independently accounted for as an activity, and that this sector is not the financial asset the foresters claim.
43. Professor Deiter Helm states that the costs of food production (from the farmer or shopper) do not reflect the full social or environmental costs e.g. diffuse pollution cleaned up by water companies (paid for by consumers) and Natural Resources Wales (paid for by taxpayers). For example, nitrate levels caused by diffuse pollution increase the cost of treating water and
- between 2005 and 2010, water companies spent over £300 million (£288 million capital expenditure, £6m per annum operating expenditure) to reduce diffuse nitrate pollution
 - between 2010 and 2015 they spent £70 million removing nitrates from raw water.
44. Excluding externalities is not in line with the Ecosystem Approach¹² and gives a false picture of the relevant merit of each sector. As such, we would welcome a thorough and comprehensive review of the economics of natural resources in Wales by an independent organisation such as EFTEC or the New Economics Foundation (NEF). This document should then be the reference document for both SoNaRR and the NRP to help drive action.

¹⁰ NRW - Diffuse Water Pollution in Wales Issues, solutions and engagement for action
<https://naturalresources.wales/media/4059/diffuse-water-pollution-in-wales.pdf>

¹¹ Welsh Government Nitrate Vulnerable Zone consultation <https://consultations.gov.wales/consultations/nitrate-vulnerable-zones-wales>

¹² **Principle 4:** The greatest threat to biological diversity lies in its replacement by alternative systems of land use. This often arises through market distortions, which undervalue natural systems and populations and provide perverse incentives and subsidies to favour the conversion of land to less diverse systems. **Often those who benefit from conservation do not pay the costs associated with conservation and, similarly, those who generate environmental costs (e.g. pollution) escape responsibility.** <https://www.cbd.int/ecosystem/principles.shtml>

Key Challenges

45. Under Key Challenges, the consultation states “It is **unlikely** that ecosystems across Wales have sufficient resilience and this will impact on their capacity to provide services and benefits into the future”. However, SoNaRR states that “all habitats have problems with all four attributes of resilience”. As stated in the introduction, it is vital that we highlight the scale of the problem – therefore, the NRP must be accurate and not use language that lessens the scale of the problem.
46. The key challenges in the NRP include that many sites of European importance are in unfavourable condition. However, it does not state the fact that the majority of **nationally designated sites** (Sites of Special Scientific Interest (SSSI) and National Nature Reserves) are in unfavourable condition. For example, a ‘rapid review’ of SSSI condition – in 2006 – concluded that 68% of SSSIs were in unfavourable condition¹³.
47. It’s worth noting that most designated sites are in unfavourable condition due to external issues such as
- diffuse pollution from agriculture or
 - the invasion of non-native species from outside the boundaries (i.e. diffuse pollution from agriculture or conifer saplings self-seeding on peatland from neighbouring forestry).
- Therefore, delivering resilient ecosystems is essential to ensure the long-term viability of designated sites.

Section 2

The approach to sustainably manage our natural resources

48. The section “**What is the sustainable management of natural resources**” and Annex 1 “*Sustainable management of natural resources*” is heavily weighted towards natural resource **use**. It appears to suggest that the management of natural resources should only be undertaken in order to receive the benefits from nature. However, section 4 (f) of the Environment (Wales) Act 2016 highlights the “***intrinsic value of natural resources and ecosystems***” where we have a moral (and legal¹⁴) obligation to maintain and enhance biodiversity. This is a reflection of Principle 1 of the Ecosystem Approach as defined by the Convention on Biological Diversity (CBD)¹⁵.
49. Therefore, we recommend that these sections are rewritten in a manner that highlights the need to halt the loss of biodiversity/ecosystems because of their intrinsic value and our moral obligation.
50. The section ‘**The delivery framework**’ highlights that the NRP “sets out Welsh Ministers’ priorities”. To deliver Welsh Government priorities such as its legal requirements under the Act, we would specifically like to see the final NRP highlight:
- a number of key areas for restoring, recreating and reconnecting wildlife-rich spaces in rural and urban areas and the marine environment. This includes having all our designated sites (marine, estuarine and terrestrial) in favourable condition by 2026 (as per the target in the **Environment Strategy 2006**¹⁶ where the now First Minister pledged his ongoing commitment to delivering the vision set out in the Strategy¹⁷).
 - how area statements should look to restore, recreate and reconnect wildlife-rich spaces in rural and urban areas and the marine environment

Section 3

Developing the Natural Resources Policy

51. We support the Welsh Government’s intention of working with stakeholders to inform the development of the policy as part of:
- The principles of the sustainable management of natural resources in Annex 1

¹³ CCW (2006). Condition of SSSI Sites and Features.

¹⁴ Section 7 of the Environment (Wales) Act, the Wildlife and Countryside Act (as amended), the Habitats and Birds Directives, Bern and Bonn Conventions, Ramsar Convention etc.

¹⁵ Principle 1: **Ecosystems should be managed for their intrinsic values and for the tangible or intangible benefits for humans, in a fair and equitable way.** <https://www.cbd.int/ecosystem/principles.shtml>

¹⁶ See page 36 of the Environment Strategy for Wales (2006)
<http://gov.wales/docs/desh/publications/060517environmentstrategyen.pdf>

¹⁷ See foreword by Carwyn Jones in the Environment Strategy (2006)

- the Ways of Working in the Wellbeing of Future Generations Act
 - The Aarhus Convention and its Protocol empower people with the rights to participate effectively in decision-making in environmental matters
52. The State of Nature Report 2016, alongside the mid-term review of the EU Biodiversity Strategy, gives a sobering picture of the progress made to date to halt the loss of biodiversity. It warns that the overall target of halting biodiversity loss won't be met unless action is stepped up. Therefore, under challenges, we would like to see the appropriate wording i.e.:
- As reported in the State of Nature (2016) over the last 50 years, 56% of species have declined, while 15% are at risk of disappearing from our shores altogether.
 - As reported in SoNaRR, most of our designated sites are in unfavourable condition.
53. We would then expect appropriate wording on how to address the challenges such as:
- Restore, re-establish, maintain and/or enhance the living organisms and types of habitat included in the section 7 list¹⁸
 - having all our designated sites in favourable condition by 2020 including the Natura 2000 network
 - adhere to the EU Biodiversity Strategy to halt the loss of biodiversity and ecosystem services in the EU by 2020 in both the marine, estuarine and terrestrial environments
 - the implementation of any management measures which are needed to achieve Good Ecological Status in the marine environment as per the requirements of the MSFD
54. **Reference to current EU policies and targets is particularly important to embed in the NRP to avoid moving backwards, post Brexit, on any progress made to date.**

Three priority themes

55. The three priority themes identified for the NRP are:
1. **Accelerating green growth** by increasing resource efficiency, renewable energy and supporting innovation.
 2. Delivering **nature-based solutions** to improve resilience and the benefits derived from natural resources.
 3. Improving community and individual well-being by **taking a place and landscape based approach**

However, we would like to see the addition of a **fourth key theme**:

4. *Halting and reversing the decline in ecosystems and biodiversity*

56. Much of the rationale for this fourth theme has been highlighted above. However, it is also worth stating that without this fourth theme the purpose stated within the Environment (Wales) Act of '*maintaining and enhancing resilient ecosystems*' cannot be delivered. This fourth theme is also crucial to the effective delivery of the other three themes. For example, the Organisation for Economic Co-operation and Development (OECD) states that **green growth** "*means fostering economic growth and development while ensuring that natural assets continue to provide the resources and environmental services on which our well-being relies*"¹⁹. They state that the focus of green growth strategies is to ensure that natural assets "*can deliver their full economic potential on a **sustainable basis**. That potential includes the **provision of critical life support services – clean air and water, and the resilient biodiversity** needed to support food production and human health*". Without this fourth theme, it will not be possible to deliver resilient ecosystems across Wales.
57. SoNaRR found that **none of Wales' habitats are resilient** and this means that their capacity to provide ecosystem services and benefits are at risk.

¹⁸ Section 6 and 7 of the **Environment Act** which requires Ministers and public bodies to maintain and enhance the living organisms included in any list published under section 7

¹⁹ OECD - What is green growth and how can it help deliver sustainable development?

<http://www.oecd.org/greengrowth/whatisgreengrowthandhowcanithelpdeliver sustainable development.htm>

58. Green growth needs to **provide for critical life support services – clean air and water, and the resilient biodiversity**. Therefore, you cannot have green growth without resilient biodiversity and ecosystems.
59. This rationale combined with the significant evidence-base above should lead to the inclusion of the fourth priority them – **“Halting and reversing the decline in ecosystems and biodiversity”**. Otherwise, Wales’ natural resources will not be able to support Wales’ prosperity and therefore Wales will not realise the significant green growth opportunities.

Green growth

60. We agree that green growth should also look at **“high quality food”**, namely agriculture. To achieve green growth, agriculture in Wales needs to play a central role in achieving Wales’ legal obligations to reduce carbon emissions by 80% by 2050 and reversing the loss of biodiversity. Farming and inappropriate land use, such as forestry on deep peat, has led to a significant reduction in biodiversity and ecosystem services in Wales as already highlighted. This is especially important as farmed and afforested environment in Wales covers over 90%. However, unsustainable practices (externalities such as diffuse pollution) are not currently reflected in the rural economics.
61. Therefore, it is clear that due to the scale of the degradation of biodiversity and ecosystem services, we must develop not only sustainable but ecologically restorative policies post Brexit. The NRP should include reference to a new **Sustainable Land Management Policy**²⁰ to replace CAP. This new policy should seek to invest in and support our natural environment and be based upon the following key principles:
- Creating multiple outcomes; for example, supporting sustainably produced food, reversing habitat and wildlife declines, conserving soil and carbon, and managing the movement of water,
 - Investment and not subsidy investing public money in public need,
 - Fostering greater public understanding of the value of the natural environment and the role of consumer choice,
 - Promoting high quality, high welfare, ecologically sustainable food production,
 - Upskilling for those who work in the environment including land owners and managers and supporting innovation.
62. The NRP also states that green growth should move **“towards a more resource efficient economy”**. This should include looking at more green taxes or incentives on natural resource use such as:
- **The deposit return scheme** - National deposit returns systems already successfully operate in many other countries²¹. They have been shown to improve recycling rates and reduce litter²². The system sees customers pay a small cash deposit when they buy a drink in a can or bottle, and get the money back when they return the item to a collection point. The items can then be recycled into new containers or other packaging. As we have seen with carrier bag charging, attaching a value to something can be very effective in helping us make small but important changes.
 - **Tax breaks on repairing everything** - Sweden's government wants to give people tax breaks on repairing everything from shoes to washing machines as part of a new green drive to help the environment by making the country less wasteful²³. They plan to slash VAT on repairs to bicycles, clothes, and shoes, and to bring in a new tax break for people who carry out more expensive repairs to fridges, dishwashers and washing machine. The tax break on appliances may create a new home-repairs service industry, **providing much-needed jobs**²⁴.

²⁰ Wildlife Trusts Wales evidence to the Climate Change, Environment and Rural Affairs Committee Inquiry into the Future of Agricultural and Rural Development Policies in Wales

<http://senedd.assembly.wales/documents/s57463/AAB%2031%20Wildlife%20Trusts%20Wales%20WTW.pdf>

²¹ <http://www.zerowastescotland.org.uk/content/deposit-return-system-feasibility-study>

²² <http://www.telegraph.co.uk/news/2016/03/23/charge-20p-deposit-for-drinks-bottles-to-stop-litter-charity-urg/>

²³ How Sweden wants to make repairing things cheaper - <http://www.thelocal.se/20160917/sweden-wants-to-make-repairing-things-cheaper>

²⁴ Waste not want not: Sweden to give tax breaks for repairs <https://www.theguardian.com/world/2016/sep/19/waste-not-want-not-sweden-tax-breaks-repairs>

- A **packaging tax** which could work alongside producer responsibility laws. Obligated companies could pay a packaging waste management contribution to the Packaging Waste Fund in order to
 - finance the cost of collection, recovery and correct disposal of packaging waste placed onto the market²⁵
 - support environmental charities such as Keep Wales Tidy
 - A **Visitor Investment Scheme**²⁶ similar to one in Snowdonia²⁷ National Park Tourists where visitors could be asked to add a small sum to their hotel bill or admission fee to help support environmental projects in the area. The Visitor Investment Scheme is a reconceptualised version of the Visitor Payback Scheme, as it's couched in more positive terms where conservation takes precedence over financial considerations.
 - Business Improvement Districts - A Business Improvement District (BID) is a defined area within which businesses are required to pay an additional tax (or levy) in order to fund projects within the district's boundaries. This levy can be used to fund green infrastructure improvements which in turn increases visitor spend because:
 - it increasing the number of people visiting retail areas by up to 40%²⁸
 - customers are prepared to pay more for parking and goods (9-12% for some products) in landscaped shopping areas²⁹
63. This will help move towards a more circular economy in Wales where raw materials are kept in productive use for as long as possible. This could significantly reduce the impact on our natural resources whilst providing opportunities for jobs and sustainable economic growth and helping to address risks to long-term supply chain security.
64. Green growth is often seen as **renewable energy** i.e. Swansea Tidal Lagoon. However, renewable energy like all development needs to be located in the appropriate places not only to generate power but also to minimise its environmental impact. For example, harnessing the Severn Estuary's tidal energy could fundamentally change its ecology, affecting both people and wildlife. It's no exaggeration to say that the Severn Estuary is an irreplaceable part of the UK's natural heritage. It boasts some of Europe's finest natural habitats and wildlife, recognised and protected by international, European and UK laws and agreements. Therefore, we need to make sure that we find the right means of harnessing a fantastic resource without losing this wonder of the world. This needs to be reflected in the NRP.
65. It is also important that support for renewables should be part of action to reduce the consumption of non-renewables, not just to facilitate increased consumption or to export non-renewables at the same rate of extraction.
66. As such, we recommend that the wording is changed from 'accelerated' to '**sustainable' green growth**.'

Nature-based solutions

67. We strongly support the use of **nature-based solutions** to improve resilience and the benefits derived from natural resources, with the condition that solutions build in biodiversity measures. There are some nature-based solutions which don't provide benefits for biodiversity or contribute towards creating resilience ecosystems, therefore this should be central to any solutions identified.

Improving community and individual well-being by taking a landscape based approach

68. We support the principle of "*Improving community and individual well-being by taking a place and landscape based approach*" providing the following concerns are addressed:

²⁵ A Quick Guide to Packaging Legislation in the Netherlands <http://valpak.co.uk/docs/default-source/international-compliance/a-quick-guide-to-packaging-legislation-in-the-netherlands-2015.pdf?sfvrsn=2>

²⁶ Scott et al (2003) Visitor Payback: Panacea or Pandora's Box for Conservation in the UK? Journal of Environmental Planning and Management, 46(4), 583–604, July 2003

http://users.aber.ac.uk/mec/Publications/Papers/JEPM_03_%20Visitor%20Payback.pdf

²⁷ Snowdonia levy could see £1 put on the food and hotel bills of visitors <http://www.dailypost.co.uk/business/snowdonia-levy-could-see-1-10645184>

²⁸ Defra and The Association of Town Centre Management (2007)

²⁹ Forestry Commission, The Case For Trees In Development And The Urban Environment (2010).

- The language needs to reflect the Environment (Wales) Act 2016 which takes an **ecosystem** approach (section 4 – which is based on the Convention of Biological Diversity Ecosystem Approach³⁰)
 - **the wording suggests that it could be an optional extra** such as “*taking such action can: act alongside or as part of existing activities such as farming, forestry and urban development*”. This wording sounds like biodiversity offsetting³¹ which is problematic as some habitats have evolved over millennia and are irreplaceable. As the farming, forestry and urban development are all significantly damaging to ecosystems, the sustainable management of natural resources should be central to their functioning rather than running alongside it e.g. **Sustainable Land Management Policy**.
69. The NRP states that SoNaRR identifies significant opportunities for landscape scale approaches. They give examples of increasing woodland cover. The Wildlife Trusts have long called for the creation of **new native woodland**, which is underpinned by recognition of the value of trees and woods for biodiversity as well as for climate change mitigation and adaptation. In relation to woodland, this policy should aim to:
- create connectivity, especially linking up areas of ancient and/or semi-natural woodland
 - any increases in woodland need to be ‘the right tree in the right place’ not in areas that are already valuable habitats in their own right, such as semi-natural heathland or grassland, peatland or other sensitive wetland habitats.
 - woodland cover should be native woodland rather than coniferous woodland which can contribute to a decline in biodiversity i.e. acidification, pollution via pesticide leakage, and sedimentation of local rivers etc.
 - enhance and respect local distinctiveness through restoration of landscapes
70. We strongly support the inclusion of the **Lawton Review** of wildlife sites principles with the NRP. The Lawton Review, outlined the need to ‘*embrace a new, restorative approach which rebuilds nature and creates a more resilient natural environment for the benefit of wildlife and ourselves*’. It advocated ‘*bigger, better and more joined up*’ ecological networks and responsible, landscape wide action, balanced with better biosecurity.
71. We strongly support the **Biodiversity and Resilience of Ecosystems Duty**. We believe that the NRP should incorporate some high level information such as actions “*to build and/or continue capacity (i.e. Local Authority Ecologists and Biodiversity Officers) to support local natural resource management to deliver multiple (ecosystem) benefits and compliance with the new biodiversity duty in the Environment (Wales) Act 2016*”³²

Annex 1

How do we know when we are achieving the sustainable management of natural resources?

72. We strongly disagree with the use of the four measures set out in the NRP consultation document for measuring SMNR. These measures were used in SoNaRR to measure **unsustainable** Management of Natural Resources, assuming that if resources are not being unsustainably managed then they are being sustainably managed. This is not the case and should not be used to measure Sustainable Management of Natural Resources. The critical components of the definition of SMNR (i.e. maintaining **and enhancing**) do not come through currently.
73. Biodiversity is the key tenant of ecosystems and more diverse ecosystems are in general, more resilient. Therefore, a key test of whether we are achieving sustainable management of natural resources is whether we have halted and reversed the decline in biodiversity. To do so, there must first be an acknowledgement that the current state of the marine, estuarine and terrestrial ecosystems are largely in a degraded state.

³⁰ Page 11 of the Environment (Wales) Bill Explanatory Memorandum <http://www.assembly.wales/laid%20documents/pri-ld10201-em/pri-ld10201-em-e.pdf>

³¹ Wildlife Trusts Biodiversity Offsetting <http://www.wildlifetrusts.org/biodiversityoffsetting>

³² Welsh Government (Dec 2016) - **Guidance for the Single Revenue Grant to Local Authorities in Wales 2017-18**

74. As such, in order to optimise ecosystems services delivery, we must first restore and enhance our ecosystems and their biodiversity which drives them. All industries that 'utilise' ecosystems and ecosystems services must contribute to their restoration and enhancement including farming, marine, forestry and development sectors.

Annex 2

Key Challenges

75. In addition to the challenges identified within the consultation document, we recommend the inclusion of the following challenges:
- **Reversing biodiversity decline and improving the resilience of ecosystems** - Changing land management practices, urbanisation, pollution and invasive non-native species have led to habitat loss and fragmentation, which, coupled with acidification and eutrophication, have changed the quality and quantity of wildlife they can support.
 - **Increasing the availability and robustness of evidence on the resilience of marine ecosystems** - Lack of information on the marine environment makes assessments of condition and decision making around use of this resource challenging. Building the evidence base would facilitate better informed decisions and management.
76. Moreover, we would recommend the following modifications to the other challenges in order to ensure they reflect the requirements in the Act.
- ~~Maintaining~~ **Protecting and restoring our productive capacity** – Loss of soils and reducing soil quality, threats to pollinators and our plant health and from invasive non-native species risk the productive capacity of our land for food, timber and fibre, including our energy. **There is a need to ensure sustainable practices so that our ecosystems have the capacity to support sustainable production**
 - **Improving health and equity** - Noise, poor air quality and fly tipping are impacting on local environmental quality and our health. Lack of access to good quality green or blue spaces reduces individual well-being and can affect mental health. These impacts are disproportionately experienced in poorer urban areas. **Improving health and equity is a benefit that should arise from addressing this, and benefits would be delivered across the wellbeing goals**

BARRIERS THAT NEED TO BE ADDRESSED

77. Key barriers identified to maintaining and enhancing ecosystem resilience in Wales and the effectiveness of the NRP to deliver resilient ecosystems include:
- Getting past the 'take all we can get away with' approaches to resources. We should be focussing on reducing the need for exploitation and extraction where possible rather than 'where can we get away with taking more'.
 - Identifying a clear baseline against which we can assess progress. Avoiding long-term decline is a fine aspiration, but in many cases we are already in an impoverished state (e.g. lowland grassland, fish stocks).
 - There is an erosion of expertise within NRW to develop appropriate solutions. It is vital that NRW lead the way on this policy.
 - Local Authorities must be fully engaged in this process. There needs to be a clear understanding and commitment to deliver and the current fine and incentives are not sufficient. Local Authorities lack staff with the skills and necessary influence to drive these issues up their agenda in house.
 - There is a serious lack of data and lack of understanding of data quality, management and generation. This needs to be addressed to improve the decision making.
 - There are varying interpretations of words such as 'sustainable' and 'optimal'. The policy needs to be clear and unambiguous if it is to achieve what is intended.
 - There is a risk of confusion with the use of very similar acronyms for this policy (Natural Resources Policy -NRP) and the Nature Recovery Plan.

KEY STEPS TO DELIVER ON THE PRIORITY THEMES AND ADDRESS THE KEY CHALLENGES

Key Challenges	Risk	Priority	Opportunity
<p>Reversing biodiversity decline and improving the resilience of ecosystems</p> <p><i>*Note: Not listed as a 'Key Challenge' in the NR Policy document</i></p>	<ul style="list-style-type: none"> Ecosystems are not resilient and are unlikely to continue to provide benefits. Changing land management practices, urbanisation, pollution and invasive non-native species have led to habitat loss and fragmentation, which, coupled with acidification and eutrophication, have changed the quality and quantity of wildlife they can support. 	<ul style="list-style-type: none"> Put in place and improve implementation of measures to reverse biodiversity decline and improve other aspects of ecosystem resilience. Move towards a circular economy that enhances our natural environment whilst responsibly using natural resources. 	<ul style="list-style-type: none"> Improve community and individual well-being through whole place planning and landscape scale approaches. Improve priority species and habitat status – satisfying International commitments under Aichi, providing cultural ecosystem services and intrinsic benefits to biodiversity itself. Integrate biodiversity into 'nature based solutions' for all key challenges. Promote green growth that has the necessary safeguards in place to enhance and utilise our natural resources and to ensure they are not exploited with a disregard for potential consequences.
<p>Increasing the availability and robustness of evidence on the resilience of marine ecosystems</p> <p><i>*Note: Not listed as a 'Key Challenge' in the NR Policy document</i></p>	<p>Insufficient data precludes full assessment of the resilience of ecosystems and hampers our ability to implement appropriate protection and management measures.</p>	<ul style="list-style-type: none"> Develop and support programmes to gather and harness more data that can ensure evidence-based solutions. 	<ul style="list-style-type: none"> Implement data-gathering mechanisms that are sustainable and ensure NRW has oversight of updating SoNaRR to be the most up-to-date evidence base possible.
<p>Safeguarding and increasing carbon stores – i.e. through a loss of storage in soil and diminishing woodlands</p>	<p>Carbon emissions and climate change in general threatens all aspects of life in Wales. To not urgently address our emissions would also ignore our international, statutory targets.</p>	<ul style="list-style-type: none"> Increase carbon stores by working with land managers of upland peatlands and protecting / restoring woodlands. 	<ul style="list-style-type: none"> Nature based solutions including peatland restoration and management. Planting woodland in both urban and rural spaces for carbon capture. Support the development of renewable energy that is compatible with delivering biodiversity obligations and maintaining and enhancing the resilience of ecosystems.

Key Challenges	Risk	Priority	Opportunity
Protecting and restoring our productive capacity – such as tackling threats to pollinators and plant health	<ul style="list-style-type: none"> Degraded ecosystems are unable to support productivity. Producing food and other goods becomes economically untenable for many farmers and other land managers. ‘Brexit’ threatens income sources to support land managers. Degraded marine ecosystems are unable to support viable fisheries. 	<ul style="list-style-type: none"> Develop new sustainable land management policy in the context of SMNR – ensuring the objective to maintain and enhance the resilience of ecosystems and the benefits they provide is central. As part of this policy, explore how to better reward provision of public benefit (i.e. resilient ecosystems, ecosystem services, biodiversity). Future marine and fisheries management policy to be integrated with SMNR. Increase the potential for the Marine Plan to deliver an ecosystem approach by ensuring it is better informed about ecosystem benefits and priorities. 	<ul style="list-style-type: none"> To ensure that Wales is well prepared for the loss of the CAP and puts in place future land management policy which is sustainable and based on SMNR principles. Seize opportunities for high value markets for new and innovative products and services based around SMNR i.e. not a ‘race to the bottom’ for widely available products. Land management can contribute to ‘nature based solutions’ by ensuring that production is kept in line with biodiversity solutions.
Reducing the risk of flooding	Flooding creates widespread damage, by causing long-term and often irreversible water damage to homes and businesses. Flooding is also frequently an indication that natural features are not being protected adequately or flood plains are being built on without consideration of the associated risks.	<ul style="list-style-type: none"> To identify the causes of flooding (i.e. building in poor places and removal of natural water retention features) and plan accordingly. 	<ul style="list-style-type: none"> Develop Sustainable Drainage Systems (SuDs) by prioritising green infrastructure that reduces surface run off i.e. tree planting, green roofs and creating and enhancing features of wetlands, rivers and floodplains.
Improving health and equity – such as noise pollution, poor air quality and fly-tipping. This includes improving access to green and blue spaces	Citizens, particularly in deprived areas, suffer from the effects of increased noise and air pollution, especially in urban areas. Residents’ health also	<ul style="list-style-type: none"> To increase access to green and blue spaces by investing in and joining up green infrastructure networks. 	<ul style="list-style-type: none"> People’s health improves when they are near green spaces and economic prosperity is also encouraged when green access is a

Key Challenges	Risk	Priority	Opportunity
	suffers when they don't have access to natural space or are not given opportunities for active travel. This, in turn, exacerbates health inequalities.	<ul style="list-style-type: none"> • Prioritising citizens' health by incentivising the reduced use of cars, increasing public transport and capping how much noise and air pollution is allowed when making planning decisions. 	<p>feature for both residential and business developments.</p> <ul style="list-style-type: none"> • Use air pollution as an opportunity for implementing large-scale green projects like street trees, green walls and other natural carbon capture mechanisms.
Improving the quality and maintaining the availability of water	<ul style="list-style-type: none"> • Water consumption is constantly increasing and is unsustainable. • Water treatment costs are increasing and pollution is an ongoing risk to natural waterways and its wildlife. 	<ul style="list-style-type: none"> • Encourage better efficiency and reduce waste. • Address water quality at source by improving habitats to decrease soil erosion and reduce pollution. 	<ul style="list-style-type: none"> • Nature based solutions for water retention and access. • Education for both adults and children of the best way to use water. • Continue campaigns to ensure people are using flushing systems correctly, without contamination of pipes.
Improving the quality and connectivity of our habitats	A loss of habitats rapidly leads to a decline in species, which can take a lot longer to restore than it does to destroy. A loss of species leads to a dangerous reduction in biodiversity.	<ul style="list-style-type: none"> • Protect and enhance existing habitats and ensure that planning takes into consideration the impact on all local species. 	<ul style="list-style-type: none"> • Use habitats for both wildlife promotion and tourism, in a responsible and environmentally sound way. • Safeguard and restore habitats, whilst reintroducing species that have been driven out of Wales from over development or poor SMNR.
Retaining the distinctiveness of our places and historic landscapes	Distinctive natural places (such as waterscapes, woodlands or heritage trails) and historic landscapes can be eroded by the natural environment not being protected or access not prioritised.	<ul style="list-style-type: none"> • Protect and promote responsible use of National Parks, Areas of Outstanding Natural Beauty and UNESCO World Heritage sites. 	<ul style="list-style-type: none"> • Conserve, enhance and utilise our historic and cultural heritage assets, for both the Welsh public and the tourism industry. Wales' historic and distinctive landscapes are a key tourist attraction and should be valued accordingly.

Ymgyrch Diogelu Cymru Wledig Campaign for the Protection of Rural Wales



Cyfarwyddwr Director Peter Ogden

Natural Resources Policy Branch
Welsh Government,
Floor 1 East,
Cathays Park,
CARDIFF
CF10 3NQ
January 30th 2017

Dear Sir / Madam,

Consultation on Natural Resources Policy

Response by the Campaign for the Protection of Rural Wales (CPRW)

1. General comments

1.1 As a pan Wales landscape charity seeking to ensure the use of the nation's natural resources and land use change is guided in a manner which protects the intrinsic values of all Welsh landscapes and seascapes, CPRW welcomes the opportunity to respond to this important consultation statement, the outcomes of which will have direct implications upon our charitable objects.

1.2 Our desire to promote the sustainable use of Wales' natural resources in ways which integrate and enhance the resilience of those natural and cultural values which characterise the relationship that people have with their "bro" are well known, as is our desire to ensure that the quality and distinctiveness of the Welsh countryside, as a whole is safeguarded and enhanced for the benefit of future generations. The future use of our natural resources we believe must therefore respect the need to maintain these important relationships and values.

1.3 In responding therefore to the initial Natural Resource Policy statement we therefore look for clarity and certainty as to

- how these place based relationships are articulated.
- how any high level management objectives ensure the continued integrity and distinctiveness of the Welsh countryside.
- how the trademark qualities of excellence, diversity and resilience are promoted in order to ensure that Welsh landscapes continue to provide the greatest possible range of appropriate public wellbeing benefits in the future.

1.4 These goals we believe, can only be achieved if the NRP, positively embraces and is founded upon a creative and integrated “place based landscape approach”.

1.5 For this to be the case, such an approach must acknowledge the fundamental prerequisite that every part of Wales possesses individual but often different qualities and values and therefore has differing potential and limitations in terms of how its natural resources can and should be used in the future.

1.6 CPRW therefore wholeheartedly supports the third of the three overarching principles suggested in Section 3 of the consultation document, namely that any future approach to natural resource use and management should reflect a “...a **place and landscape based approach**” and not articulated in any lesser way for instance simply as an ecosystems approach.



1.7 Whilst agreeing that an ecosystems approach is an important element of the overall NRP approach, it is not the only factor of relevance and cannot possibly be effective unless the management of ecosystems takes place in their realistic social, heritage, cultural and economic context.

1.8 As the accompanying figures demonstrate, ecosystems and their associated natural processes are important components of our environment and collectively interact with other factors to create landscapes

and seascapes. Every individual place therefore has its own specific and identifiable combination of characteristics which reflect a range of physical and cultural interactions, not just those defined by its constituent ecosystems.

1.9 We therefore agree that the term “**place**” most appropriately defines one important component of the overall NR management approach; namely that action should take place **at the geographical and spatial scale most appropriate to the challenge being addressed**, be it increasing upland carbon sequestration opportunities over extensive areas of uplands or dealing with localised surface water drainage in municipal circumstances.

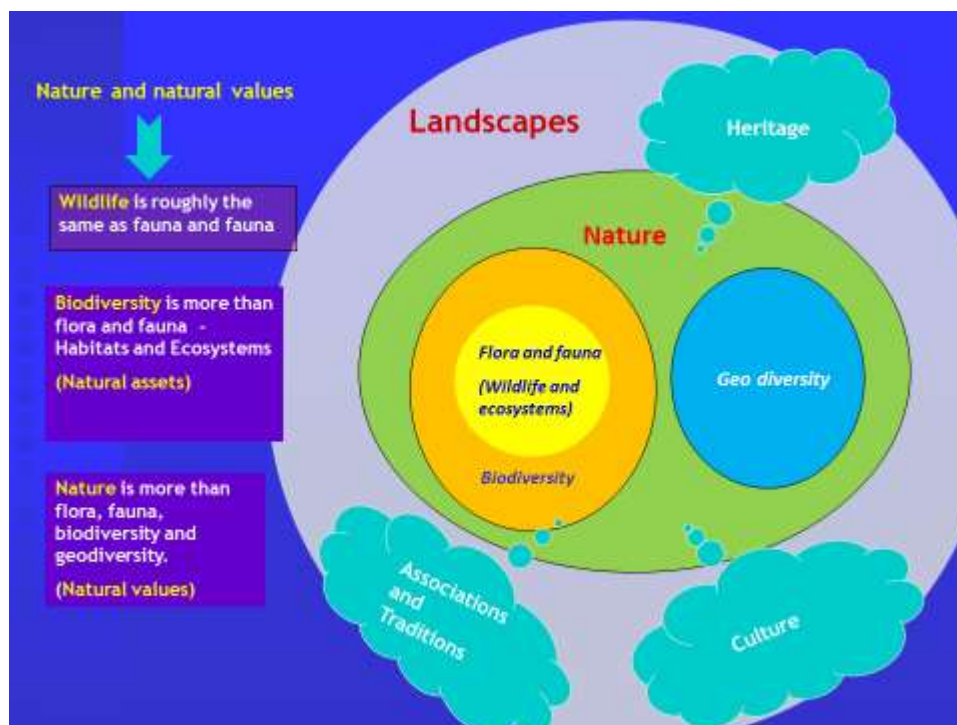
1.10 We likewise agree, that the supplementary term **landscape** defines both the “framework for change” and “the scope for change”. The combination of national natural resource priorities and the nature the relationships which exist between

those combinations of values which give individual places their distinctiveness, therefore provide the key parameters to guide change.

1.11 Ecosystems therefore create some but not all values of a place and are certainly some important building blocks of both places and landscapes. The corollary however is not the case.

1.12 We therefore suggest it would be helpful to explain the relationship of the three terms, ecosystems, places and landscapes and that the Policy statement recognises they are each aspects of the hierarchical expression of the different spatial and physical relationships of natural resources.

1.13 We suggest this relationship can be best visualised as follows



1.14 Natural Resource management we believe should therefore not be confined to simply managing biodiversity or ecosystems any more than it should be limited simply to carbon management. It must be based on the principle of managing those elements of the environment which define **the valued character and functional integrity of a “place”** and implemented in ways which ensure those intrinsic values and inter relationships which define that place’s distinctiveness, are maintained and enhanced so that collectively the functional resilience of all these elements, i.e. “the landscape” are safeguarded.

1.15 We suggest the final version of Natural Resource Policy document should therefore articulate these relationships clearly and also include a framework of priority objectives which guide the future management of individual and combinations of landscapes in ways which ensure that all spaces and resources function as part of a coherent network.

1.16 The management approaches adopted in our most sensitive protected landscapes, i.e. those in Wales' National Parks and AONBs (in particular but not exclusively) show how this "landscape approach" has been successfully achieved.

1.17 The concept of managing "**high quality, resilient resource hubs**" therefore provide the means by which the integrity of these "reservoirs of quality" can be maintained whilst at the same time acting as the core areas to and from which the fragmented elements of other landscapes can be reconnected.

1.18 We believe this concept represents an important principle which should be included in the NR Policy. Namely that

- *The management of core areas of nationally important natural resources ensures that the inherent public benefits associated with these areas are safeguarded and enhanced.*
- *Mechanisms are developed to ensure the resilience of these areas is increased and the benefits they provide flow outward beyond their boundaries.*

1.19 In this way biodiversity, heritage stewardship can be successfully integrated as well as increased opportunities for improved public access, education and community led approaches to environmentally responsible stewardship realised over much wider areas than at present..

1.20 Nationally important landscapes therefore represent and should be recognised in the Policy statement as core natural resource hubs and therefore as both fundamental components of nation's natural resource base and important dynamos to drive a more ambitious and integrated natural resource management approach aimed at enhancing the quality, distinctiveness and resilience of all the landscapes of Wales.

1.21 It is therefore disappointing that the evolving NRP has not taken into account the findings of the Marsden report (2015) on the future role of nationally designated landscapes in Wales, nor the subsequent proposals which have emerged from the more recent Future Landscapes Programme chaired by Lord Dafydd Elis-Thomas.

1.22 The conclusions and recommendations of both these significant pieces of work are particularly important given the integrated approach which characterise and have been adopted to promote the sustainable management of the various social, economic and land use resources in these most sensitive of rural landscapes.

1.23 We therefore suggest this “**natural resource hub**” principle which prevails in over 25% of Wales’ internationally important landscapes, should be a more central foundation of the final version of the NR Policy statement.

1.24 In addition to embracing the important context and role that all landscapes and seascapes play, we also believe the NR Policy statement would be improved through the inclusion of a series of clearly defined headline **national natural resource ambitions**, themselves complemented by a set of operational objectives / interventions to guide how these ambitions would be achieved through the medium of Area Statements. At the moment there is no indication as to how the interrelationship between the two policy documents would be achieved.

1.25 We would therefore suggest the elements of this National ambition should reflect the fact that

Wales’ natural resources are trademarked by

- **Their quality, diversity, distinctiveness and resilience**

achieved by:

- a) Adopting “Place and landscape based approach” to guide natural resource use.
- b) Incentivising environmentally sustainable Green and Blue growth practices.
- c) Increasing innovative and integrated resource uses

- **The quality and range of public benefits they provide.**

achieved by

- a) Prioritising creative and responsible Nature based solutions.
- b) Valuing those public benefits which currently have no obvious market worth
- c) Securing new sources of long term funding which provide certainty of support to land owners and managers.

1.26 Equally if the success of the natural resource management approach depends on building more effective and resilient relationships of the kinds described above, the National Policy statement should address the question of how decisions regarding future land use “choices” will be made. This can only be realised we suggest, if

- The desired national outcomes of our natural resource uses are clearly defined and spatially described. i.e. what is wanted, how much, where and how will it be achieved.
- Public awareness and understanding of these desired outcomes is widespread and support for them is convincing.
- The local implications of these national ambitions are clearly understood and supported.
- Public and sectoral attitudes towards the crucial role the environment plays as a life support system, are changed.
- Convincing incentives which drive behavioural change and promote alternative resource uses exist.
- Responsibility for promoting and supporting change is clearly defined.
- Collaboration of thought and action prevail.

1.27 At the moment the existing version of the National Policy document does not appear to embrace or address a number of these issues sufficient well enough for the reader to understand how they will be achieved in practice and therefore “what better might eventually look like”.

1.28 It is also of concern and puzzling that the document does not instinctively reference nor highlight the importance of the evidence base provided by NRW’s State of Natural Resources (SoNaRR) report and also its much referenced LANDMAP information resource.

1.29 These evidence bases, provide the most complete empirical picture of the current resilience of Wales’ natural resources and therefore the clues as to how their status can be enhanced, how future developments can be best planned, how regeneration can be positively inspired and how sustained and enhanced local distinctiveness can be creatively achieved.

1.30 Cumulatively this range of evidence therefore provides both the context and foundation for understanding and addressing the future challenges and the opportunities which enhanced investment in the management of the environment should focus upon. It also provides a sound basis for more informed decisions about what to keep, how to care for it and how to accommodate change in ways which respect and celebrate the individuality of a place.

1.31 The use of this data in setting national policy and thereafter local priorities would also encourage people to deepen their understanding and appreciation of their “bro” and those surroundings they are familiar with, thereby helping to instil a sense of ownership and local pride for them and ultimately encouraging local people to take a more active role in caring for their local environment.

1.32 As mentioned previously, given that 25% of Wales is designated because of its international landscape importance and over 50% of the landscapes of Wales are recognised as being of high national value, why the NRP does not take the significance of Wales' landscapes into account in a more direct and obvious manner is puzzling?

1.33 Finally we suggest the proposed metrics for measuring how the sustainable use of natural resources is being achieved, should not be based solely on the parameters which might define ecosystems resilience or the improvement in the status of biodiversity. The value human use contributes (both positive and negative) to the character of the nation's natural resource base is a crucial dimension of the concept of resilience and should be an integral element of any proposed monitoring of the future success of the NR policy approach.

2. Further comments

2.1 Given the context described previously, we are particularly conscious that despite the Environment Act (2016) setting out the Principles of the Sustainable Management of Natural resources as yet these have not been translated into a series of specific national land use priorities nor interpreted in any associated spatial way. We believe the NRP should do so and provide a clear explanation of how the proposed Area Statements are expected to translate these national priorities and expectations into action locally.

2.2 Likewise it is important that the Policy statement clarifies and explains how the NRP will inform and its principles influence, the strategic thinking which shapes the National Development Framework, PSB Wellbeing plans and likewise the work of the proposed Wales National Infrastructure Commission. These relationships will be fundamental in ensuring that land use planning and land use management approaches synchronise in an effective manner across both land and sea and deliver the Welsh Government's wellbeing ambitions.

2.3 As mentioned previously we reiterate therefore that we expect the final version of the NRP to set out a series of clear strategic objectives explaining how the expectations of the Principles of the Sustainable Management of Natural Resources in the Environment Act (2016) will be achieved in a practical sense.

2.4 So far as the steps required to deliver the nation's natural resource priorities and their associated key challenges, we suggest the NRP needs to consider the following

- Defining the desired national outcomes clearly and spatially.
- Ensuring that all Government policies are consistent with and reflect the principles of sustainable natural resource management.

- Securing adequate resources to effectively incentivise nature and landscape based solutions.
- Defining the risks and time scales associated with changing long established land uses and the consequences of promoting “trade-offs”
- Developing mechanisms to resolve tensions when the promotion of new uses of natural resource is inherently in conflict with others.
- Establishing local processes which ensure national ambitions and local preferences match.
- Implementing collaborative approaches which secure geographically large scale, diverse and functionally connected networks of ecosystems rather than islands of ecosystems improvement in a sea of fragmented and dysfunctional landscapes.
- Linking the management of resources on land and at sea in an integrated way.
- Establishing appropriate progress measures and national indicators which demonstrate the improved resilience of the nation’s natural resources and the enhanced quality of the public benefits they provide.
- Establishing a more bespoke measure for assessing enhanced landscape quality, distinctive and resilience.

2.5 CPRW trusts that our comments prove helpful and confirm that its comments can be made available to others if so required.

2.6 In the meantime, I would be grateful for your acknowledgement of the safe receipt of this submission and in due course welcome sight of your response to the representations you receive to this important document.

Thanking you in anticipation.

Yours Sincerely,



Peter Ogden
Director

Consultation to inform the development of the Natural Resources Policy

Response from RSPB Cymru

1. RSPB Cymru welcomes the opportunity to respond to this consultation. We have also provided input via a number of the stakeholder workshops and other meetings, and we have contributed to the response provided by Wales Environment Link.
2. In this response we provide comments on the priority themes and key challenges identified, as well as on key steps required and barriers to be overcome, as requested. We are particularly concerned that the Natural Resources Policy (NRP) should be clear as to what needs to be done in relation to biodiversity – a specific requirement of the Environment Act, and we provide some specific comments in this regard.
3. We understand that the Natural Resources Policy (NRP) will be a high level, strategic policy, and that it is aligned with the Programme for Government. The Programme for Government is itself a high level document, which promises further development of four Strategies. It has not yet been made clear how stakeholders will be able to input to these strategies – we would welcome the opportunity to engage in their development.

General comments

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

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

Biodiversity

8. As noted above, the Environment Act requires the Welsh Ministers to set out, in the NRP, what they consider should be done in relation to biodiversity. This gives the opportunity to set out the Welsh Government's commitment to halt and reverse biodiversity loss and deliver the Aichi 2020 targets (a recent analysis by RSPB and partners shows that all countries need to significantly raise their level of ambition if the Aichi targets are to be met¹).
9. We welcome the reference to the Nature Recovery Plan in the consultation document, but consider that the final NRP must be much more explicit that it (the Nature Recovery Plan) is to be effectively embedded as part of the framework for delivering sustainable management of natural resources (SMNR). We absolutely agree that embedding biodiversity action into Area Statements and Well-being Plans is vitally important; the NRP should make explicit that the preparation of these will need to draw directly from the Nature Recovery Plan, including its Action Plan. As noted in the consultation document, this approach will help public authorities to deliver their Biodiversity and Resilience of Ecosystems duty (under s6 of the Environment Act).
10. We welcome the narrative under the priority theme of '....taking a place and landscape based approach', which emphasises the importance of restoring habitats in achieving resilience – further thoughts are provided under our discussion of that theme.
11. However, in setting the ambition to work at scale, we consider that the NRP should make stronger reference to valuable nature conservation tools that exist to maintain and enhance the resilience of ecosystems. Protected sites are key among these, and the NRP should include a commitment to prioritise monitoring and management of these sites to attain favourable condition/favourable conservation status. We note that the NRP's predecessor – the Natural Resources Policy Statement – identified the need to improve the management and use of protected sites, but feel this has been somewhat lost in the current consultation

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

document and needs to be brought to the fore. We also welcome (as we discuss further later in this response) the consultation document's recognition of the role of protected sites at the centre of resilient ecological networks, in line with the recommendations of the 'Lawton Review'. There is substantial evidence that protected sites remain important in maintaining and enhancing wider biodiversity together with their target features in the context of climate change².

12. Site protection and management is currently under-prioritised and under-resourced. If the objective of SMNR is to be delivered this must change, and we would welcome a clear commitment to this in the NRP.
13. The fundamental role of species conservation and recovery in achieving SMNR must also be asserted in the NRP. (The SoNaRR states, for example, *'for the ecosystems of Wales to be resilient we would expect the full range of native species and habitats that remain to be maintained, with populations either stable or increasing'*). We have commented further later in this response on the need to integrate species priorities into consideration of 'nature based solutions' and a 'place and landscape based approach'.
14. The NRP should also commit to setting relevant milestones and measures in relation to our progress in halting and reversing biodiversity loss, under the Well-being of Future Generations Act (WFG Act) framework of indicators and milestones, the Nature Recovery Plan, and the SoNaRR. The National Indicators established under the WFG Act include a priority species indicator (based on the section 7 list), which we consider to be a key measure of whether SMNR is being achieved (as the SoNaRR points out, the current decline of species, and their failure to recover, is a signal that ecosystems are not resilient). We note that during the passage of the Environment Bill the Welsh Government made clear that the WFG Act framework was, in its view, the appropriate place to set milestones and measure progress for national biodiversity indicators – a view that was endorsed by the Environment and Sustainability Committee's Stage 1 report – we would welcome a reassertion of the Welsh Government's commitment to this use of the WFG Act framework in the NRP.
15. The condition of protected sites is recognised both by SoNaRR and by the consultation document to be an important indicator of resilience (or, currently, lack of it), but SoNaRR reports evidence gaps relating to the condition of SSSIs. We call for a clear commitment in the NRP for appropriate management to achieve favourable condition to be in place for all of Wales' designated sites by 2026 (which accords with the earlier Environment Strategy commitment, but recognises that attaining favourable condition may be a longer term goal for some sites due to wider environmental issues). In this regard we note the important work done by NRW in identifying the key actions required to bring Wales' Natura 2000 sites into favourable conservation status. Monitoring of site condition (including for domestic

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

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

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

16. Brexit represents a threat and an opportunity for SMNR

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

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

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

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

20. A new framework for governance and delivery of the Nature Recovery Plan must be established quickly

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

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

21. The loss of biodiversity and nature conservation specialists due to budget cuts within NRW and local authorities also presents a significant barrier to delivery. A current barrier to delivering the Nature Recovery Action Plan is lack of support and capacity in Local Authorities to promote and co-ordinate biodiversity work; addressing this through allocation of resource would also help Local Authorities and others comply with their Biodiversity and Resilience of Ecosystems Duty.
22. The Sustainable Management Scheme is a welcome funding mechanism. We would recommend that, in addition to its important focus on supporting partnerships, it should require a portion of all bids to focus on concrete actions to build ecosystem resilience (this draws on the example of the EU LIFE Nature fund).
23. Given the advent of the new legislation (both the WFG Act and the Environment Act), and its recognition of the benefits we derive from natural resources and ecosystems, we believe there is a stronger case than ever to ring-fence proceeds from wind turbines erected on Government-owned land and redirect it towards building ecosystem resilience. Commitment to other funding streams, such as the Landfill Tax Community Fund, is also essential. The RSPB is currently advocating that this fund be specifically embedded in the Landfill Tax Bill to secure its longevity.
- 24. Recommended improvements to Glastir must be implemented**

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

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

species if present.

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

26. Forestry regulation – increasing EIA threshold to 20 or 50 hectares would run counter to achieving SMNR

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

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

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

29. Enforcement of basic standards to unlock the potential for PES markets

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

30. The NRP must provide greater focus on the marine environment

While we recognise the importance of Wales' National Marine Plan in securing sustainable development of our seas, we note that there is still work to do to ensure it reflects the multiple benefits provided by ecosystems and the need to safeguard biodiversity, in addition

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

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

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

Comments on the key challenges and priority themes

Key challenges

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

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

35. We welcome the reference to safeguarding and increasing carbon stores, but note that the consultation document also refers to other ways in which natural resources and their management contribute to mitigating against climate change, including resource efficiency measures and renewable energy generation. This challenge could be reworded to reflect this - ***'Mitigating and adapting to the effects of climate change through safeguarding and increasing carbon stores and supporting renewable energy development in harmony with nature'***.
36. The challenge *'Improving health and equity through access to quality green and blue spaces'*, unlike the others in the list, puts the benefit or opportunity ahead of the action needed in terms of sustainable management of natural resources (SMNR). We would suggest the challenge is really about improving local environmental quality, including the natural environment, and provision for access so that more people have the opportunity to benefit from high quality environments. We would suggest rewording along these lines, e.g. ***'Improving the quality of local environments to enable more equitable access to nature and resulting benefits to health'***.
37. The challenge of *'Maintaining our productive capacity'* should also be reworded, as we feel it could currently be read as a commitment to maintaining production, whether or not it is in line with SMNR. We suggest ***'Supporting sustainable production, providing a wide range of benefits for people and nature'***.

Priority themes

38. We recognise there are benefits to ensuring strong resonance between these priority themes and the Programme for Government, as it is vitally important for all government departments and the wider public sector to recognise the role of SMNR and their essential contribution to achieving it.
39. The Cabinet Secretary, in her foreword to the consultation document, stated *'The evidence in relation to the challenges our natural resources face is also clear and underline that a step change is needed in order to address the unsustainable trends within the State of Natural Resources report'*. We wholeheartedly agree. If it is to effect this step change, we believe the need for change needs to be more clearly expressed by the priority themes. In addition, rather than simply reflecting how natural resources can support the aims of the programme for Government, they should be more clear about how they will contribute to SMNR. We offer some suggestions in this regard below.

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

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

41. It is vitally important that this cannot be read as simply a commitment to sustained development without recognising both the constraints and opportunities that achieving SMNR presents. For example, ‘increasing renewable energy’ is an important aim, which we support, but one that needs to be delivered in the context of understanding and avoiding impacts on biodiversity and ecosystems. The RSPB’s 2050 Energy Vision report identifies how ambitious targets for emissions reductions can be met through harnessing renewable energy in harmony with nature³.
42. We note the Welsh Government’s interest in the development of tidal power. The RSPB recently welcomed Charles Hendry’s recommendation that the Swansea Bay lagoon project should be treated as a pathfinder, to allow lessons to be learned about how to deploy this technology in an ecologically sensitive way. However, we note that this is a new and expensive technology; it must also not distract from the need for continued investment in existing affordable alternative and potentially more sustainable sources of renewable energy, and it must not cause needless harm to nature and fabulous ecosystems like the Severn.
(<http://www.rspb.org.uk/community/ourwork/b/martinharper/archive/2017/01/12/how-to-harness-the-tidal-power-of-the-severn-estuary.aspx>)
43. In addition, from the discussions we have participated in it feels as though the commitment to move towards a circular economy and increase resource efficiency have been overshadowed by concern and confusion over the phrase ‘*accelerating green growth*’ and would benefit from being brought out more strongly.
44. We welcome the recognition in the narrative of the potential economic importance of management of natural resources both for food and other goods and services, which presents opportunities particularly in the light of the EU referendum result. As noted above we expect the final NRP to set clearer direction in terms of developing new land and sea use policies in the context of SMNR.
45. We would suggest this priority theme should be reworded to reflect the need to ***increase resource efficiency and move towards a circular economy while ensuring sustainable development - harnessing the potential of natural resources without compromising the objective to maintain and enhance the resilience of ecosystems and the benefits they provide.***
46. ***Delivering nature-based solutions to improve resilience and the benefits derived from natural resources***
It became clear during workshop discussions around this theme that ‘resilience’ in the context of this theme refers to ‘social, economic and ecological resilience’ as referred to in Goal 2 of the Well-being of Future Generations Act, rather than ‘the resilience of ecosystems’ which is the central objective of SMNR. While they are obviously very closely related, the former is broader, and it would be helpful to make this more clear in the

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

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

47. Building on this point, we consider it essential that the NRP makes clear that delivering benefits for biodiversity is an aim of this priority theme. The development of nature based solutions should make clear that their design should integrate consideration of what biodiversity needs – in particular the priority species and habitats listed under section 7 of the Act. This could influence the design of the solutions themselves – for example, what trees to plant in urban areas; how to design water treatment reed beds to provide habitat for key species; and so on. It could also mean *protecting*, as well as restoring, areas of habitat such as peatland, from land use change or development because of the benefits they provide. And it would mean carefully considering the impacts of 'natural solutions' on priority species and habitats – so that these could be avoided, mitigated or as a last resort compensated for. For example, a commitment to increasing woodland cover should not lead to planting in areas where it would damage populations of priority species and their habitats; a commitment to managed realignment should include provision of replacement habitat for species (such as lapwing) making use of the habitat that will be lost. The RSPB is currently investing in some research to support the integration of biodiversity into 'natural solutions' via Area Statements, which we will make available in due course.
48. We welcome the listed commitments under the international Nature Based Climate Action MoU, which do appear to reflect the need to integrate the needs of biodiversity (although it is unfortunate they do not refer to enhancing and restoring, as well as safeguarding, biodiversity).
49. ***Improving community and individual well being by taking a place and landscape based approach***
The wording of this theme heading is confusing, given the narrative that follows it. The narrative places a welcome emphasis on the need to maintain and enhance the resilience of ecosystems through protecting, managing and restoring habitats at a large scale. It does not discuss the community and individual well-being benefits, which are explored in more detail under the previous theme. Unfortunately, the wording of the theme heading (and of the three theme headings taken together) could suggest that the NRP places no emphasis at all on the key actions needed to build ecosystem resilience.
50. The State of Natural Resources Report (SoNaRR) found that none of Wales' ecosystems is resilient; therefore building this resilience should be the absolute starting point of the NRP. During the workshops, a slide was shown that illustrated that this theme effectively underpins the other priority themes.
51. It was helpful and reassuring to see this slide and we would strongly urge that it be included in the final NRP. We also recommend that this priority theme be reworded, to '***Taking a***

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

52. We welcome the paragraph citing the 'Lawton Review', outlining the ambition to improve the condition of priority areas while expanding and making connections between them, to improve the resilience of ecosystems and help develop protected sites as the cores of large scale functional networks.
53. We consider it important that the final NRP is more explicit about the essential role of existing nature conservation tools in delivering this ambition and achieving SMNR – designated sites in particular, with their appropriate management to attain favourable condition being a key policy commitment.
54. Furthermore, beyond assuming that '*As opportunities for spatially targeted actions to build healthy resilient ecosystems that deliver key ecosystem services are identified, there will almost certainly be a strong correlation with priority habitats and species*' the NRP should make an explicit commitment to halting and reversing biodiversity decline by ensuring the needs of priority habitats and species are integrated into place and landscape scale approaches.
55. Without explicit commitments of this sort, there is a risk that species and habitats will be sidelined by a focus on ecosystem services, such that, not only could opportunities for positive measures be missed, but damage could be inadvertently caused (e.g. through creating a new habitat on an area that is already important for priority species).
56. We hope the comments in this consultation response are helpful in combination with the input we have provided via other routes. The RSPB is committed to ongoing engagement in implementing the Environment Act.

For further information, please contact Annie Smith - annie.smith@rspb.org.uk

Natural Resources Policy development

Page 1: Submit your response

Q1. You are about to submit your response. Please ensure you are satisfied with the answers you have provided before sending.

Name	Steve Bolchover
Organisation (if applicable)	Swansea Biodiversity Partnership
Phone number	01792 872449
Address	16 Woodlands, Gowerton, Swansea SA4 3DP

Q2. If you want to receive a receipt of your response, please provide an email address.
Email address

stevebolchover@gmail.com

Q3. Written feedback on the priority themes and key objectives within them outlined in this document would be welcome as part of this consultation exercise. In particular, taking into account the legal framework and its requirements as outlined in this document, it would be helpful to receive contributions on: the key steps that need to be taken in order to deliver on the priority themes and address the key challenges; the barriers that need to be addressed.

Biodiversity and Invasive Non-Native Species

The Swansea Biodiversity Partnership welcomes the proposals to address the challenges facing the environment in Wales and in particular the challenges to our biodiversity and ecosystems. We believe that Natural Resources Wales can best address all of the challenges by working in partnership with other organisations and individuals who share the desire to improve our environment.

We are very concerned about the decline in our wildlife, a decline which is not limited to the iconic species which attract public attention. If action is not taken to protect their habitats it is likely that many species of plants and animals will be irretrievably lost. Protection of biodiversity has generally involved establishing lists of plants, animals and habitats considered to be at risk, and providing them with a degree of protection. Inevitably the organisms placed on the lists have tended to be the better known and more spectacular ones. We believe that it is important to make the process of constructing the lists more transparent so that organisms which need protection can be more easily placed on them, and would suggest that a set of criteria should be developed to enable unlisted organisms which meet them to receive protection if necessary. We would suggest that such criteria should include a priority for protecting species which have important populations in Wales, particularly those which are found exclusively in this country.

The consultation document rightly recognises the increasingly important role played by ordinary citizens of Wales on a voluntary basis. Local authorities in Wales have increasingly called upon local volunteers to help them run community facilities and parks and to increasingly take responsibility for elements of their local environment. Biodiversity has a rich history of action by ordinary volunteers who are prepared to give their time to help local wildlife. Such volunteers are the backbone of organisations like RSPB and the wildlife trusts and that they have shown themselves willing to take up challenges on behalf of local wildlife for many years. In particular they are often the first people to become aware of new situations, whether the loss or decline of local species or issues related to incursions by non-native invasive species.

However volunteers need an organisational framework for their efforts to be most effective. We would suggest that organisations like ourselves already provide such a framework and have done so for many years. Our partnership was originally formed to develop local biodiversity action plans, and similar partnerships were formed in many local authority areas. The groups brought together at a local level the organisations and individuals interested in improving our biodiversity. Our view is that the existence of such partnerships provides an opportunity for very much more effective and sustainable work to be done to address the biodiversity challenges, and we would urge NRW and government to make effective use of them.

We also believe that it is critically important for NRW and government policies to be soundly grounded on evidence based evaluation of biodiversity in Wales. The four local environmental record centres in Wales have accumulated huge amounts of data derived from the records compiled by thousands of local recorders. This information and the system which allows it to be continually added to is an invaluable resource and it is vital that NRW and government ensure that they continue to have the financial support necessary for them to continue to provide their service.

We would also like to draw attention to the important role played by biological reference collections held in museums. These collections provide vital reference material for researchers and, more importantly, a vital resource for individuals seeking to improve their specialist skills in identifying many groups of plants and animals. This is a critically important function played by museums in addition to their more widely recognised public educational role. Like many other organisations, our museums have suffered serious reductions in their budgets in recent years. It is vital that they are provided with sufficient resources to maintain their collections, a resource which cannot be replaced if lost.

Q4. If you have any related issues which we have not specifically addressed, please use this space to report them:

No Response

Q5. Responses to consultations may be made public. To keep your response anonymous (including email addresses) tick the box.

No Response

Consultation Response Form

Your name: Kenneth J. Richards. MRTPI

Organisation (if applicable):

email / telephone number:

ken.j.richards@sympatico.ca

Your address: 26 Playter Blvd.

Toronto. ON.

M4K 2W2

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:

☐

Question: Written feedback on the priority themes and key objectives within them outlined in this document would be welcome as part of this consultation exercise. In particular, taking into account the legal framework and its requirements as outlined in this document, it would be helpful to receive contributions on:

- the key steps that need to be taken in order to deliver on the priority themes and address the key challenges; and,
- the barriers that need to be addressed.

If you have any related issues which we have not specifically addressed, please use this space to report them: (see next page):

The Draft Policy Statement does not mention the Historic Environment (Wales) Act, and the recognition accorded in that Act to the register of historic landscapes of Wales.

A landscape based approach, as outlined in section 3 (Developing the Natural Resources Policy), should take into consideration the formal existence of these areas in the preparation of area statements.

Consideration should also be given to the incorporation of a statement regarding the relevance of National Parks, Areas of Outstanding Natural Beauty, World Heritage Sites and Listed Parks and Gardens.

(The comment is based on advice in "The Protected Landscape Approach: Linking Nature, Culture and Community, (Eds. Jessica Brown, Nora Mitchell and Michael Beresford. IUCN, 2005). Also, recent interpretations of this approach in North America by the Center for Landscape Conservation (www.largelandscapes.org).

Natural Resources Policy development

Page 1: Submit your response

Q1. You are about to submit your response. Please ensure you are satisfied with the answers you have provided before sending.

Name	Betty Lee
Organisation (if applicable)	-
Phone number	01244 550 993
Address	15 Newton Drive, Buckley, Flintshire, CH7 3EB
	-

Q2. If you want to receive a receipt of your response, please provide an email address.
Email address

bettylee_uk@btinternet.com

Q3. Written feedback on the priority themes and key objectives within them outlined in this document would be welcome as part of this consultation exercise. In particular, taking into account the legal framework and its requirements as outlined in this document, it would be helpful to receive contributions on: the key steps that need to be taken in order to deliver on the priority themes and address the key challenges; the barriers that need to be addressed.

Too much focus on processes, too little focus on delivery.
Lack of long term monitoring means valuable and limited resources are not used efficiently.
Worthwhile projects fail in the long term because of lack of monitoring. Mistakes are repeated as overall assessments are inadequate.

Q4. If you have any related issues which we have not specifically addressed, please use this space to report them:

No Response

Q5. Responses to consultations may be made public. To keep your response anonymous (including email addresses) tick the box.

No Response

Consultation Response Form

Your name:
Rosie Carmichael

Organisation (if
applicable): Chair,
Carmarthenshire
Local Biodiversity
Partnership
email / telephone
number:

RACarmichael@car
marthenshrie.gov.uk

Your address:
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County Council
7/8 Spilman Street
Carmarthen SA31
1JY

Question: Written feedback on the priority themes and key objectives within them outlined in this document would be welcome as part of this consultation exercise. In particular, taking into account the legal framework and its requirements as outlined in this document, it would be helpful to receive contributions on:

- ☐ the key steps that need to be taken in order to deliver on the priority themes and address the key challenges; and,
- ☐ the barriers that need to be addressed.

If you have any related issues which we have not specifically addressed, please use this space to report them:

Page 6 – text box at bottom of page.

The highlighted text is confusing. The GVA figure for Welsh agriculture “as a whole” seems not to include the £1.55billion GVA attributed to on farm production, why not? It also seems that the agricultural GVA is smaller than the GVA given for forestry, which would seem unlikely. Incidentally the Office for National Stats gives the 2015 GVA for farming forestry and fisheries in Wales as £373 million. Importantly this source highlights

that this is just 0.7% of the total for all industries in Wales. It is important to use statistics in a meaningful way. A figure with no context cannot be interpreted by a lay person or non-expert.

From the text box:

**What the Natural Resources Wales' 'State of Natural Resources Report' says:
How our natural resources currently support our key sectors**

Wales' coastal and marine environment contributed £6.8 billion to the economy of Wales, supporting more than 92,000 jobs.

The Gross Value Added (GVA) for Welsh agriculture as a whole is £385 million. This underpins the £6.1 billion annual turnover and £1.55 billion GVA attributed to the on-farm production and food manufacturing sector.

The forestry sector in Wales in 2015 had an annual GVA of £499 million. In 2013 it was estimated that the forestry sector in Wales employed between 8,500 and 11,300 people.

The following is a useful reference to the GVA for agriculture in Wales:

<https://assemblyinbrief.wordpress.com/2016/09/26/welsh-farming-facts-and-figures/>

Page 7 Key challenges

An estimated 3,400 litres of water per person per day is used to produce the food and goods our society uses. Population forecasts for Wales mean that household demand for water could increase by 3%, an additional 12 million litres per day by 2025.

Does this actually mean in Wales we use 3,400 litres of water per person per day? A lot of our food is produced elsewhere so does the 3,400 litres include for example the water used to water the beans that are grown in Kenya that we might buy? It is confusing to use both consumption per person per day as a measure and then refer to household demand. Is it the population forecast that suggests that there will be a 3% rise in demand for water, or an increase in the number of households, due to changes in demographics? The use of these figures need to be reviewed.

Page 12 The Biodiversity and Ecosystems Duty

The natural resources policy can therefore provide a strong pro-active platform which supports action on biodiversity across the public sector. Embedding action into Area Statements and Well-being Plans and taking it forward through local partnerships will therefore help public authorities to deliver the objectives of both the Nature Recovery Plan and address their Biodiversity and Resilience of Ecosystems Duty.

These objectives are admirable. However Welsh Government should take account of the structures within public sector and the resources available for ensuring that the Biodiversity Duty is fully embraced. Very limited experience suggests that in terms of setting Well-being Objectives and Well-being Plans economic prosperity and health are of greater concern to these organisations, and that is where their expertise lies, and consequently it is in these areas where they likely to carry out actions that will demonstrate compliance with the Well-being and Future Generations Act. Only some Local Authorities have biodiversity officers in post who can provide some advice on this new duty, most will have an ecologist but they are fully stretched with planning work, etc. Such organisations may have a large team of officers dealing with community or economic regeneration issues. It is suggested that the public sector need far more

support if the opportunities for change, and the enhancement of the natural environment commensurate with the Biodiversity Duty are going to take place within public authorities. Senior officers within public authorities do not tend to have an ecological background, yet they need to be ensuring that this new duty is met.

The priority themes:

Page 12 Accelerating green growth

Renewable energy, such as wind, hydro, solar power and biomass, has contributed to growth in the sector in the last 10 years and offers significant potential for further growth both on land and at sea. Measures to support energy efficiency have a key role to play in reducing energy poverty in Wales.

To date investment in renewable energy has been very dependent on economically attractive feed in tariffs. Now these have declined CCC is seeing less interest in both solar and small/ medium sized wind turbines. Without developer interest further growth in this area of renewable energy is unlikely to materialise.

Key Steps

Look at new ways of encouraging the production of renewable energy that maintain and enhance biodiversity and promote ecosystem resilience.

Continue to develop ways and encourage methods to reduce energy consumption.

Barriers

A lack of economic incentives that would encourage the incorporation renewable energy and energy saving technology into projects,

Lack of regulations/best practice that requires the above.

Page 13 Nature-based solutions:

*Better soil management for carbon storage, water quality and continued productivity, **for example peat land management**, using streamside corridors and strategic hedge planting on farms;*

What is meant by the highlighted text, should it read better “management of habitats that support peat”?

There is a concern that a nature based solution might be interpreted as a way of replacing an existing habitat or species with another, which may not be appropriate. Classic examples of this include is making a pond or planting broadleaved tree in species rich grassland. It is imperative that in devising nature based solutions we ensure that we are maintaining and enhancing biodiversity and not replacing it with something different.

Key Step:

Develop examples in Wales of best practice, relevant to public authorities, that delivers appropriate nature-based solutions in a cost-effective manner and promote these widely with the aim of them becoming normal practice.

Develop CPD for relevant profession to raise awareness of nature-based solutions and support professionals as they make changes to the way they work and introduce these new methods.

Ensure that all Welsh Government funding requires nature-based solutions to be incorporated into and evidenced in all funding programmes.

Ensure that nature-based solutions add to biodiversity and do not merely replace it with something else.

Barriers:

Professional that are reticent to make changes to the ways they work, and long-established practices.

Lack of awareness of the options available for nature-based solutions.

There may well be a concern that a nature-based solution might be interpreted as a way of replacing an existing habitat or species with another.

Page 14 Improving community and individual well-being by taking a place and landscape based approach

“The historic environment also draws many visitors into Wales and many of Wales’ most beautiful landscapes are also rich in the remains of previous human activity”.

Could the word archaeology be used here – previous human activity could just be fly tipping.

Page 14 Improving community and individual well-being by taking a place and landscape based approach

CCC endorses a landscape approach to building ecosystem resilience. However the vast majority of the wider countryside in Wales lies outside of designated sites, is owned privately and much of that is farmed. A landscape approach will inevitably mean working in partnership with interested organisations and individuals. The current agri-environment scheme Glastir is undoubtedly having an impact delivering environmental benefits, such as new woodland planting etc., but as this remains a voluntary scheme, and it does not currently operate in a strategic way, e.g. it cannot target tree planting in areas where it might be most beneficial, it remains opportunistic, supporting actions that landowners have volunteered to carry out. Previous shorter-term WG grant-funded projects have used LIDAR information to identify areas where tree planting would be beneficial in terms of reducing run-off, and perhaps a similar but a longer terms approach developed that could be more strategic. Our current agri-environment scheme is not really integrated with any other approach to managing the natural environment. For example, agriculture has never really been integrated with biodiversity action - even where the objectives are shared (e.g. management of marshy grassland in the Cross Hands area in Carmarthenshire) - reasons given for this by the agricultural sector include possible breaches of confidentiality issues. This can become a barrier to effective partnership working, but with thought can surely be resolved.

Page 14 Taking action can:

Act alongside or part of existing activities such as farming, forestry

How will the Welsh Government develop its agricultural policy so that it operates alongside this new approach to the management of natural resources, and also the Nature Recovery Plan? How will it develop its agricultural policy in a way that demonstrates the new ways of working – collaboration, integration, prevention, long term, involvement, etc? The way we manage our agricultural land is incredibly important if we are serious about managing natural resources, e.g. conserving productive soils, reducing run-off and consequently flooding, addressing pollution, improving water quality etc. The SoNaRR identifies significant opportunities for landscape scale approaches to:

- Work within whole catchments to manage nutrients, and maintain, enhance and restore floodplains and hydrological systems
- Better manage the uplands to deliver multiple benefits

How can these objectives be achieved unless natural resource managers work in partnership with the agricultural sector?

Key step – engage with agricultural community to build consensus and identify shared objectives that will deliver community and individual well-being, as well as maintaining and enhancing biodiversity, and promoting ecosystem resilience across catchments and in the uplands. Ensure the greed approach also delivers the Nature Recovery Plan.

Barriers

Agricultural sector does not have a history of working in partnership with natural resource managers/ biodiversity and nature partnerships to deliver shared objectives. Agricultural sector has not tended shared information on achievements with other sectors, despite being funded from the public purse.

Additional general comments:

Timing of the report - As well-being-assessments are currently being produced and PSB priorities and well-being plans developed, will the Natural Resources Policy priorities be overlooked in the PSB process? All these plans/objectives seem to be being developed at different rates and are not integrated. The plethora of plans, policies and reports is also beginning to cause confusion within public bodies.

Communication – it is evident that the WFG Act and Env Act have not been adequately communicated to officers in public authorities. The principles of the former appear to be interpreted in a relatively restricted way when delivering the PSB duty (see above).

Integration – it needs to be clear as to how the Natural Resources Policy priorities will deliver the Nature Recovery Plan objectives. In the Nature Recovery Plan it says that ‘It is essential that these objectives inform all of our approaches to reversing the loss of biodiversity, across all of our policies, strategies and programmes.’ Objective 6 of the Nature Recovery Plan states: *Put in place a framework of governance and support for delivery* saying that ‘Underpinning our action, we also need a governance structure that is fit for purpose to support and deliver action on the ground. We need to ensure we have the skills, expertise, personnel and functions in place to deliver.’

Our concern is that while delivering the three priority themes highlighted in this report, maintaining and enhancing of biodiversity may be overlooked, as may the conservation of our existing wildlife habitats and species. It would be appropriate for this report to make more reference to the WG’s Nature Recovery Plan and set out how it integrated with this plan and how it will support its delivery. There is a concern that a nature based solution might be interpreted as a way of replacing one existing habitat or species with another.

From: Martin Murray [mailto:MMurray@carmarthenshire.gov.uk]

Sent: 03 February 2017 16:36

To: Natural Resource Management

Subject: Consultation - Natural Resources Policy Development

Consultation Response Form

Your name: Martin Murray

Organisation (if applicable): Carmarthenshire County Council

email / telephone number: 01269 598380

Your address: Countryside Recreation Unit

Mynydd Mawr Woodland Park

Tumble

Carmarthenshire.

SA14 6HU

Question: Written feedback on the priority themes and key objectives within them outlined in this document would be welcome as part of this consultation exercise. In particular, taking into account the legal framework and its requirements as outlined in this document, it would be helpful to receive contributions on:

- the key steps that need to be taken in order to deliver on the priority themes and address the key challenges; and,
- the barriers that need to be addressed.

If you have any related issues which we have not specifically addressed, please use this space to report them:

I would simply like to make the point that tourism brings in more money to the Counties of Wales than farming does. In order to support the tourist Industry County Councils need greater financial support and better legislation in order to be able to promote tourism. In order to promote tourism - all Counties need a viable network of walks and riding trails. **STOP paying farm subsidies, (or significantly reduce subsidies) to landowners and farmers who do not have all their Rights of Way open and accessible.**

This will justifiably put pressure on all farmers/landowners receiving subsidies to maintain an open and accessible network of paths and bridleways. All Counties within Wales would then - within a relatively short space of time - be in a fit state to promote tourism – currently most are not. **It makes good sound business sense.** Then there are the spin offs like improved Health and Well being of a nation – tackling obesity, appreciation of the natural world, encouraging outdoor recreation and so on

I have given a great deal of thought to how NRW, Central Government , County Councils and farmers/land owners could and should work better together to open up the ROW network – there would need to be scheme where the farmer/landowner and County Councils can claim for installing **British standard** countryside furniture – kissing gates etc – these could be supplied **by** County Councils to landowners **to ensure an acceptable product** with installation carried out by the landowner or County Council staff/contractors who then claim the cost back from NRW or Central

Gov. There is a limited scheme (ROWIP) that Councils use via NRW currently but this is rather inflexible not allowing for landowner input to the scheme or contributing to a schedule of works – this needs to be changed and improved and above all made simple. Regards - Martin Murray - Countryside Recreation Officer.

Martin Murray

Swyddog Hamdden Cefn Gwlad

Gwasanaeth Parcmon Cefn Gwlad - Uned Hamdden Cefn Gwlad

Countryside Ranger Service - Countryside Recreation Unit

Ffon / Tel : (01269) 598380

E-bost / Email MMurray@carmarthenshire.gov.uk

Mae croeso ichi gysylltu â'r Cyngor drwy gyfrwng y Gymraeg neu'r Saesneg.

You are welcome to contact the council through the medium of Welsh or English



Ymddiriedolaeth Cadwraeth Ystlumod (Cymru)
Bat Conservation Trust (Wales)



Canolfan yr Amgylchedd Abertawe, Stryd Pier, Aberatwe SA1 1RY
Swansea Environment Centre, Pier Street, Swansea SA1 1RY
Ffon/Tel 01269 26 87 68 E-boost/Email: slucas@bats.org.uk

Natural Resources Policy Branch
Welsh Government
Floor 1 East
Cathays Park
Cardiff CF10 3NQ

6 February 2017

Welsh Government consultation to inform the development of the Natural Resources Policy

The Bat Conservation Trust (BCT) welcomes the opportunity to be able to input into the development of the Natural Resources Policy – this very much complements our work in other areas of sustainable management of our natural resources.

BCT regards the national natural resource policy (NNRP) as a crucial over-arching and informative document that other areas of government plans and policies, including the Programme for Government, will have to conform to. These include the National Development Framework, future policy for the farming industry, and Area Statements as a means of delivering the policy, as well as aligning with other mechanism such as National Infrastructure Commission for Wales, the Planning Inspectorate and the work of Natural Resources for Wales.

In considering our response we have looked at section 9 of the Environment (Wales) Act 2016 which sets out the legal duty and the context for the NNRP.

9. Duty to prepare, publish and implement national natural resources policy

(1)The Welsh Ministers must prepare and publish a document setting out their general and specific policies for contributing to achieving sustainable management of natural resources in relation to Wales (the “national natural resources policy”).

(2)The national natural resources policy must set out what the Welsh Ministers consider to be the key priorities, risks and opportunities for sustainable management of natural resources in relation to Wales, including what they consider should be done in relation to climate change and biodiversity.

(8)In exercising their functions under this section, the Welsh Ministers must apply the principles of sustainable management of natural resources.

(9)In preparing or revising the national natural resources policy, the Welsh Ministers must have regard to the most recent report under section 8 on the state of natural resources in relation to Wales.

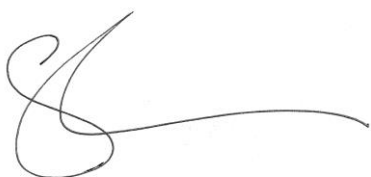
BCT understands that this Policy needs to draw support from across the public and private sectors and therefore it needs to be presented in a way that brings supporters with it and does not alienate. The consultation document has proposed three priority themes:

Accelerating green growth by increasing resource efficiency, renewable energy and supporting innovation, Delivering nature-based solutions to improve resilience and the benefits derived from natural resources, Improving community and individual well-being by taking a place and landscape based approach.

Firstly, we are unclear what is meant by the term green growth and certainly accelerated green growth may not be desirable if as a result, it results in a continued loss of biodiversity and the ecosystem services that biodiversity provides. The term circular economy may be better but we would suggest that clarification is provided and consistency of language with other relevant legislation would be beneficial. Secondly, the themes for delivering nature –based solutions and adopting a landscape-scale approach are not themes in themselves but are appropriate means towards an end. Whilst there is mention of some of the key challenges that were raised in the interim NNRP, that NNRP was not published in the context of the State of Natural Resources report (SONNaR 2016). We conclude that the current proposals as presented, does not appear to have had due regard for the issues identified in SONNaR 2016 and that the NNRP has not set out what needs to be done specifically in relation to both climate change and biodiversity as required by s9(2) Environment (Wales) Act 2016.

We would suggest that the priorities should be derived from Chapter 3 of SONNaR 2016 which would be in clear support of s9(9) of the Environment (Wales) Act 2016, and that the policy of sustainable management of natural resources should be applied to addressing the issues identified in SONNaR 2016. This would then address specifically matters of biodiversity (3.1), air quality (3.2) water (3.3), soils (3.4), and minerals (3.5) in Part A, and ecosystems in Part B of SONNaR 2016. The Nature Recovery Plan cannot be relied on to address these matters. Where these matters are not being addressed through the NNRP then the NNRP should justify why they are not being addressed. There are a number of way this could be presented – perhaps most easily be done in a table format setting out the risks and the opportunities as required by s9(2) Environment (Wales) Act 2016. Chapter 8 of SONNaR makes a number of recommendations that might be helpful. Consideration should also be given to setting out environmental limits where these are known and quantified as limits will be the defining aspect of sustainable management of natural resources. The priority themes can then be crafted around these areas to link in with the Well-being of Future Generations Act 2015.

Yours sincerely

A handwritten signature in dark ink, consisting of a stylized 'S' followed by a long horizontal stroke.

Steve Lucas
Swyddog Cymru / Wales Officer
Ymddiriedolaeth Cadwraeth Ytstumod (Cymru) / Bat Conservation Trust (Wales)

Question: Written feedback on the priority themes and key objectives within them outlined in this document would be welcome as part of this consultation exercise. In particular, taking into account the legal framework and its requirements as outlined in this document, it would be helpful to receive contributions on:

☐ the key steps that need to be taken in order to deliver on the priority themes and address the key challenges; and,

☐ the barriers that need to be addressed.

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

- Wales has a significant but necessary challenge ahead to replace fossil fuels and grow its low carbon economy. Reliance on fossil fuels is counter to ambitions in the Environment Act and Future Generations Act. Meeting future carbon budgets will require retiring fossil fuels and growing significantly in renewables and low carbon generation.
- **Large scale onshore wind has a pivotal role in delivering Wales' green growth and emissions reduction ambitions as the least cost renewable deployable at scale today.**
- Wales has the resource:
 - TAN 8 has only delivered 170MW within SSAs B,C & D boundaries
 - Vattenfall believes that the remaining market potential for SSAs B, C and D is 750-1000MW
 - The draft Wales Bill will devolve powers to consent grid infrastructure of up to 132kv as associated development. This, alongside advances in technology, offers opportunity for new thinking to facilitate deployment at least cost.
- **Grid availability is a barrier to green growth in Mid Wales and other rural areas. This compounds the political challenges that onshore wind faces in Wales. Utility-scale renewables projects can facilitate the grid upgrades required.**
- **Large scale renewables can drive growth and innovation:**
 - 2GW onshore wind by 2025 would deliver up to £2bn to economy and support over 2000 jobs (Energy Wales Delivery Plan 2014, RUK C Report)
 - In the first year of construction, Pen y Cymoedd supported over 600 Welsh jobs in over 60 Welsh companies.
 - Existing renewables projects in Wales are an opportunity to develop co-located storage projects. Vattenfall was recently successful in the National Grid Enhanced Frequency Response tender to build a 22MW battery storage project at Pen y Cymoedd. A Final Investment Decision is expected in Q1 2017.

What are the barriers that need to be addressed?

- Welsh Government must continue to lobby UK Government to clarify a route to market for large scale onshore wind and solar. Scottish Government recently published a draft Onshore Wind Policy Statement which states that *“Securing a route to market for onshore wind of all scales is a priority of the Scottish Government”* and outlines a proposal to offer increased PPA provision through the next Scottish national collaborative contract. Scottish Government is also exploring the creation of a Government Owned Energy Company to help the growth of local and community projects. **Welsh Government should consider similar public procurement opportunities for purchasing renewable power including, but not limited to, a not-for-profit Energy Supply Company for Wales as recommended in A Smarter Energy Future for Wales.**
- Alongside these efforts, new thinking is needed on grid, planning and Welsh Government support to deliver growth in the post-RO context in existing SSAs, be that through a future CfD auction and/or on a market-only basis.
- The post RO context need not be a barrier to renewable energy growth but WG must consider how to facilitate new renewables projects in this context – for onshore wind, this means consideration of taller and more efficient turbines and for all renewables projects, longer consents and measures to encourage the PPA market in the private and public sectors
- TAN8 is now an old document and requires updating to facilitate future renewable energy development in existing SSAs:
 - SSAs B, C, D have good resource but are let down by grid availability and connectivity.
 - Any future revisions must include grid availability as a consideration
 - Multiple developers competing for the same infrastructure, consent and community engagement results in loss of scale and ability to create significant economic and community opportunity
 - Consideration should be given to appetite of developers in the new environment for developing the SSAs – opportunity for an ‘amnesty’ or ‘reset’ for projects on Welsh Government land?
 - Project delivery needs support of the local authority and Welsh Government
 - WG must take steps to ensure that national policy is reflected locally and publically support the right developments in the SSAs
 - Revisions must consider how to facilitate Energy Parks, hybrid, storage projects and repowering
 - WG must ensure co-ordination with the new DNS process and Wales Bill measures
- Lack of investor confidence after a difficult few years is a barrier to green growth. A positive narrative and clear route map will be required to rebuild investor confidence to enable investors to take advantage of these opportunities. Strong, positive public statements similar to those made by Scottish Government in the recent draft Energy Strategy and draft Onshore Wind Policy Statement would be helpful.
- Storage will be a key innovation in delivering green growth. Welsh Government should ensure that local and national planning regimes are not a barrier to development. All regimes,

particularly the DNS regime, should offer clear definitions and be well understood by officials at all levels. This is particularly important when considering the co-location of storage at RO-supported sites as this is likely to be a key growth area in the coming years.

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

- At Pen y Cymoedd Onshore Wind Project, Vattenfall has worked closely with Natural Resources Wales (NRW), Neath Port Talbot County Borough Council and Rhondda Cynon Taff County Borough Council to deliver a Habitat Management Plan as required by Pen y Cymoedd's Section 36 consent and funded by a Section 106 agreement. The Environment Act has now laid a strong foundation for this kind of collaboration between businesses and Welsh Government to manage Wales' natural resources sustainably and for the benefit of all citizens.
- The aim of the Pen y Cymoedd Habitat Management Plan is to provide a process for landscape scale habitat management. Key priorities in the first five years of operation will be:
 - Restoration and maintenance of the natural hydrological regime of peat bodies, their carbon storage and sequestration potential;
 - Restoration and maintenance of blanket bog, wet and dry heath and marshy grassland as appropriate to soil conditions, hydrology and topography, with bog being the objective for deep peat soils;
 - Natural colonisation of native, non-commercial woodland where appropriate with a recommended emphasis on mineral and organo-mineralic soils on steeper slopes, along stream corridors and the use of mixed species wet woodland as a buffer around the peat land;
 - Management of stream corridors for nature conservation potential;
 - Management of feeding habitat for honey buzzard in the Resolven area if compatible with other environmental management priorities;
 - Management of habitat for nightjar where this is compatible with the objectives for bog and peat; and
 - Improving the site's biodiversity potential by maintaining and improving wider habitats and ecological functionality, with an emphasis on supporting habitats for statutory protected species where present.
- Our engagement with the local communities surrounding Pen y Cymoedd has indicated they see value in their natural resource and the potential for it to bring the community significant benefits. For example, in improving access to the natural resource for example through cycle paths or improved disabled access, more opportunities and better facilities for outdoor activities, an improved appreciation for the natural environment and a cleaner, safer community.
- **Large scale renewables projects can deliver these solutions at the scale required to achieve Welsh Government ambitions and the Environment and Future Generations Acts provide a strong**

foundation for the co-operation required. Welsh Government must create a supportive environment to bring forward these projects by taking the steps outlined above.

Improving community and individual well being by taking a place and landscape based approach

- Large scale renewables projects offer big opportunities for community investment to support the delivery of Welsh Government's well-being goals:
 - The Pen y Cymoedd Community Fund is worth £1.8m index-linked annually to benefit the host communities of the Cynon, Neath, Rhondda and upper Afan Valleys. Practical support for communities and developers to engage with and understand the opportunities these Funds provide would facilitate improved well-being
 - Shared ownership of utility-scale renewables is an opportunity for much-needed long term investment at a time of squeezed local authority budgets. Welsh Government should consider developing guidance and supporting organisations to ensure shared ownership opportunities are understood and developed.

Consultation Response Form

Your name: Paul Griffiths, Strategic Director - Place

Organisation (if applicable): Powys County Council

Your address: County Hall

Spa Road East

Llandrindod Wells

Powys

LD1 5LG

When calling please ask for Heather Delonnette

email / telephone number: heatherd@powys.gov.uk / 01597 826165

Question: Written feedback on the priority themes and key objectives within them outlined in this document would be welcome as part of this consultation exercise. In particular, taking into account the legal framework and its requirements as outlined in this document, it would be helpful to receive contributions on:

- the key steps that need to be taken in order to deliver on the priority themes and address the key challenges; and,

Local businesses need to be encouraged to develop the skills and initiatives to make the most of the green growth opportunities. Community energy generation, which is often more popular than large scale schemes, is another area which would benefit from more support both in terms of finance and regulation.

Many homes in Powys are old (and listed) and hard to treat when it comes to making them more energy efficient and there is a lack of mains gas infrastructure in many areas. Many of the energy efficiency schemes require a large number of properties to make them attractive to improve. Smaller schemes would benefit Powys residents and provide a market for local businesses.

The sharing of good practice and innovative initiatives, such as the Home Grown Homes Partnership and Wood Encouragement Policy here in Powys, would enable good ideas to be transferred across Wales.

Well-being Plans, Well-being Statements and Area Statements, some of which will be overlapping, but not necessarily co-terminus, need to align and be complementary to avoid confusion and duplication. Many of the local priority areas are likely to be less environmentally focused than any Area Statements so these need to ensure that they complement local priorities and deliver environmental gains.

Similarly other statutory plans and initiatives, such as the LDP, Active Travel, and Rights of Way need to be factored into the emerging Area Statements. Again this is to maximise the environmental benefits and to avoid duplication and confusion. This would also promote the benefits of enjoying the natural environment and green spaces to physical activity and mental well-being more widely.

Communities that appreciate and value the benefits of the environment and the services it provides are more likely to want to protect and enhance it. The greater a community's support for its local green and blue environments the more likely it is to become a local priority, further encouraging community involvement. Better communication of the local benefits of healthy, productive environments, rather than a more national one, would help with this local ownership.

Finally, a baseline of the current state of natural resources needs to be collated from the various statutory assessments being undertaken. There then needs to be a clear, and resourced, monitoring framework to demonstrate what improvements have been achieved.

- the barriers that need to be addressed.

The financial pressures on public bodies may mean that environmental considerations are not given the attention needed. The decision to leave the EU could exacerbate this, or improve it, depending on the Government's priorities and funding decisions. Political support at a national and local level, will also be needed given local pressures and priorities.

While there are, potentially, many benefits from a more strategic and integrated approach to natural resource management, the local systems approach will need supporting. For example how will local infrastructure be supported, how will landowners be compensated if their land becomes part of a flood alleviation scheme? The input of landowners (forestry and farming) will be vital in achieving many of the aims of this policy.

The links between funding and action cannot be underestimated. However the policing of landowners who are in receipt of public funding but not adhering to the terms of that funding needs to be strengthened, for example Rights of Way remaining obstructed despite public funds being paid to open them and it being the landowner/occupier who has a statutory responsibility to keep them unobstructed. If this does not happen there can be little confidence that improvements paid for have been achieved.

Finally, silo working or pigeon holing this work as 'environmental' could mean that benefits and conflicts will not be identified. The links, in this document, between natural resource

management and economic benefits are welcome but this needs to be an enduring message from all parts of Welsh Government, not just the Environment and Rural Affairs Department.

If you have any related issues which we have not specifically addressed, please use this space to report them:

As mentioned previously there is a need to ensure that local Well-being Statements, Well-being Plans and Area Statements align and are complementary, this would include Welsh Government's Well-being Statement which should inform the policy for Wales.

Has any account been taken of the possible impacts of the division to leave the EU including the possible changes to funding? This is likely to have a major impact on the involvement of landowners who may find that they are no longer able to undertake many of the activities supported by the current funding regimes. This is equally relevant to European special designated sites, i.e. the River Wye, of which Powys has more than any county in Wales.

Finally if this is intended to be a public document some of the language is a little difficult to understand, for example the wording of objectives 2 and 3.

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:

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