



## Welsh Government Consultation Responses

# Development of the Natural Resources Policy

July 2017

7<sup>th</sup> February 2016

FOA Natural Resource Policy Branch, Welsh Government,

**RE: Marine Conservation Society's response to Natural Resource Policy public consultation**

The Marine Conservation Society (MCS) is the UK's leading charity for the protection of the UK's seas, shores and wildlife. MCS champion a vision of sustainable fisheries, abundant marine life and clean seas and beaches for the enjoyment of all. To achieve measurable improvements in the state of our seas, marine biodiversity and fish stocks, MCS works with Government and stakeholders to promote changes in policy, industry practice and individual behaviour.

**Consultation questions**

Our response below remarks 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.

**General Comments**

***Please note, as a member of Wales Environment Link, we have inputted into the formal WEL response to this consultation. Please therefore take those comments as our more general feedback to the consultation. Our feedback below relates chiefly to marine natural resources and the NRP.***

The NRP drafting team should consider whether the three priority themes and associated actions can secure SMNR in the marine environment, recognising that current management of natural resources the marine environment often differ to that on land.

For example, it is often not as 'straight forward' to apply 'nature based solutions' to maintain and enhance natural resources at sea, and overall scope to do this in the marine environment, particularly with regards to sub-tidal habitats, are limited. With this in mind, the

NR policy needs to give due consideration to how we use and protect marine natural resources in a way and at a rate that is sustainable.

Furthermore, given the Natural Resource Policy Statement<sup>1</sup> was largely terrestrial in focus, this has not picked up on the challenges for achieving SMNR for Wales's marine natural resources (only coastal). We **strongly recommend** including information from the State of Natural Resources Report (SoNaRR) to provide much needed context for marine. The key national challenges for marine are identified by the SoNaRR as being issues with; evidence gaps<sup>2</sup>; development pressure<sup>3</sup>; and impacts associated with climate change.

## Marine planning and achieving sustainable management of marine natural resources

One of the biggest opportunities, but also biggest challenges recognised within SoNaRR is the 'Blue Growth' potential of Wales's sea area. Unless Welsh Government fully commits to identifying how it can utilise marine natural resources sustainably, we will end up with diminished resources, missed biodiversity targets, and an ecosystem that is unable to adapt to future change. We are therefore pleased to see expansion of marine planning in the most recent NRP draft (produced at the Jan 23<sup>rd</sup> roundtable meeting).

The NRP should reflect on the fact however that marine planning is still in its infancy and the first plan is likely to be high level in nature. We need to be realistic therefore as to the extent that marine planning can deliver SMNR in the immediate to medium term. Furthermore, there is also a strong 'Blue Growth' agenda directing the Plan (as a result of a strong aspiration for jobs and growth within Taking Wales Forward) which may result in greater emphasis on *use* of natural resources rather than their *maintenance and enhancement*. Getting the balance right between natural resource use and protection will be critical if we are to achieve SMNR of our marine natural resources.

<sup>1</sup> Natural Resource Policy Statement, November 2015; <http://gov.wales/about/cabinet/decisions/previous-administration/2015/jul-sep/environment/cs0793/?lang=en>

<sup>2</sup> State of Natural Resources Report (SoNaRR), September 2016; Chapter 6, p.31.  
<https://naturalresources.wales/media/679414/chapter-6-assessing-sm-achievement-final-for-publication.pdf>

<sup>3</sup> State of Natural Resources Report (SoNaRR), September 2016; Chapter 6, p 32.  
<https://naturalresources.wales/media/679414/chapter-6-assessing-sm-achievement-final-for-publication.pdf>

With that in mind, it is fundamental that the NRP goes further than just identifying the marine plan as a tool to deliver SMNR and highlight (at a high level) what the plan needs do to support SMNR. The NRP should reflect on the fact that:

- Marine planning in Wales must take **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 sustainable use, maintenance, recovery and enhancement of natural resources.
- The Plan must promote taking practical opportunities to secure ecosystem recovery to support resilience

Consideration should also be given to how the NRP can promote the need to fill evidence gaps in the marine environment (a key challenge recognized 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 marine environment going forwards.

### **Wider management tools necessary to achieve sustainable management of marine natural resources**

In addition to marine planning, there are additional marine management tools which are also critical to ensure we achieve SMNR, and this should be recognised in the NRP. Achieving sustainable sea fisheries for instance (a key natural resource in Welsh waters) can *only* be delivered through a much wider programme of fisheries management. The NRP should therefore demonstrate links to other natural resource policy drivers such as the **EU Common Fisheries Policy**<sup>4</sup>. Reflecting on Brexit challenges and opportunities, the NRP could comment on the need to ensure that Wales continues to set catch limits to levels above MSY once we leave Europe.

Equally, the **EU Marine Strategy Framework Directive**<sup>5</sup> is the overarching policy framework in Wales to ensure that that our marine waters (and associated natural resources) achieve Good Environmental Status, and therefore the requirements on Member States to **take action to achieve GES** must also somehow be signposted in this Policy.

<sup>4</sup> EU Common Fisheries Policy. [https://ec.europa.eu/fisheries/cfp\\_en](https://ec.europa.eu/fisheries/cfp_en)

<sup>5</sup> EU Marine Strategy Framework Directive. <http://eur-lex.europa.eu/legal-content/EN/TXT/HTML/?uri=CELEX:32008L0056&from=EN>

Furthermore, designation and effective management of Marine Protected Areas (MPAs) will be a key mechanism to ensuring SMNR in the marine environment. 50% of MPAs are currently in unfavourable condition<sup>6</sup> and as such a priority for action should be the recovery of sites through sufficient resourcing of MPA monitoring, management and enforcement. Throughout the NRP, there is notably little mention of the **critical role** that **well-managed nationally and internationally protected sites** play in ensuring sustainable management of Wales's natural resources.

### Specific comments now follow on the 'Accelerating green growth' priority theme

'A greener economy' would be a much better way of phasing this theme. Accelerating green growth sounds like development in some form/stimulating the economy when, based on the actions identified to deliver this theme, it covers much more than this.

We welcome policy on actions that will help us move Wales towards being a more circular economy, thereby reducing the amount of waste that ends up in the environment, such as at sea. Actions that could be taken include development of a Deposit Return System in Wales for single-use drink containers, and a ban on single use fast food packaging. We support the need for community energy schemes and measures to support energy efficiency in order to reduce our global dependency on fossil fuels. This document would be far more meaningful if **milestones and targets** were attached to proposed actions.

Whilst we welcome the consideration given to harvesting energy from renewable sources, consideration needs to be given to how we develop large scale renewable energy projects without having significant impacts on ecosystem resilience (both stand alone and in combination with other projects). There are strong growth aspirations, for instance, for the renewable energy sector in Wales's marine area and there needs to be a commitment to demonstrate that this can be delivered sustainably by the Welsh Government. A comment on this in the NRP is needed.

Building on the opportunities for sustainable management of natural resources and unlocking new markets will be useful. A large part of the draw to Wales (its 'Unique Selling Point') is its unspoilt landscapes, seascapes and wildlife spectacle. Working with nature (including in the marine environment) to grow this market will be a positive step towards achieving SMNR, but with an understanding that a healthy well-managed marine environment is needed in order to support human us.

<sup>6</sup> Hatton-Ellis, L. Kay, K. Lindenbaum, G. Wyn, M. Lewis, M. Camplin, A. Winterton, A. Bunker, S. Howard, G. Barter & J. Jones, 2012. MPA Management in Wales 1: Overview of current MPA management in Wales and a summary of new MPA management tools. CCW Marine Science Report 12/06/01, 56pp, CCW, Bangor



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Please do not hesitate to contact me if you have any questions regarding our response.

Yours Sincerely,

*C. Reed*

**Clare Reed**

**Swyddog Polisi Morol / Marine Policy Officer**

**Marine Conservation Society**





**President: HRH The Prince of Wales KG, KT, GCB**

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Protecting our seas, shores and wildlife

## Consultation Response

### Form

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**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.

### **Coed Cadw (The Woodland Trust) response to the Welsh Government Consultation to inform the development of the Natural Resources Policy**

Coed Cadw (the Woodland Trust) welcomes the opportunity to respond to this important consultation on the future policy towards natural resources in Wales. Our role is to champion native woodland and trees, working with others to ensure woods and trees are valued and protected. As well as caring for our own woods, we work with other landowners to do the same on their land, and we lobby and campaign for woods and trees in general.

We have 300,000 members and supporters spread throughout the UK and over 1,200 sites in our care covering approximately 23,000 hectares. These include over 130 sites in Wales, with a total area of 2,624 hectares.

### **Natural Resources Policy**

Welsh culture is steeped in the beauty and heritage of our natural environment from which also comes the resources needed to support communities and drive the economy. Whilst the potential to harness this heritage is great, we believe that recent decades have seen erosion natural resources and of the vital functions they support.

A thriving and healthy natural environment is critical for the delivery not just of the Natural Resources Policy, but of the commitments under the Well-being of Future Generations (Wales) Act. A healthy natural environment is foundational to all seven well-being goals and the basic principles of sustainable development, as is made clear in the Natural Resource Wales 'State of Natural Resources Report' (SoNRR). Whilst it may be necessary to report



on the eight activities identified in the SoNNR which reflect the breadth of natural resources management in Wales, these are of course interconnected rather than discrete issues.

We agree with the examples of the challenges faced, outlined in section 1 of the consultation. We feel strongly that it is important to recognise and tackle the interconnectedness of many of these issues. For instance the way in which permission for poultry and other livestock units is leading to air pollution and local high levels of nitrogen deposition with serious repercussion for biodiversity and subsequent ecosystem services, impacts on water quality and potential effects on human health.

Similarly the lack and loss of native tree and woodland cover and the loss of healthy hedgerows has implications for connectivity in the landscape, impacting on the survival and adaptation of wildlife, increasing the risk of water run-off, with consequences for flood risk water quality and soil degradation, and undermining carbon storage. One inevitable consequence is that the condition of designated sites is in long term decline as a result of impacts from outside of their boundaries.

The multiple benefits provided by native woodland cover, uplands bogs, and the conservation of nature more widely are, in our view, undervalued when considering sectoral interests.

We would expect that the development of Area Statements arising from the formulation of a Natural Resources Policy will take full account of the cumulative impacts of individual land use and development decisions on the state of the natural environment. In particular National Natural Resources Policy needs to cover farming, bringing it into an holistic sustainable land use approach.

- 1. A critical barrier to delivery of integrated land management which provide wide public benefits is the current consideration of land use/land management issues in isolation from wider negative effects and without consideration of cumulative impacts. There has been an attitude embedded in farming and forestry that it is acceptable to pass environmental impacts and costs onto other stakeholders to deal with.**
- 2. We believe that it is important that the Natural Resources Policy emphasises the interconnectedness of decisions on land use and natural resources management and makes clear the implications in the development of Area Statements.**

Whilst exit from the European Union and the Common Agricultural Policy poses potential problems, it also represents an opportunity to reset the funding mechanisms for land use, including farming and forestry, to meet the key challenges outlined in the interim Natural Resources Policy, namely;

- Safeguarding and increasing carbon stores
- Maintaining productive capacity
- Reducing the risk of flooding
- Improving health and equity
- Improving the quality and maintaining the availability of water

- Improving the quality and connectivity of our habitats
- Retaining the distinctiveness of our places and historic landscapes

The assets and functions which underpin these and which need to be supported in order to meet the challenges are largely public goods. That is, they are not supplied through available market mechanisms and have characteristics of public goods. For instance measures for reducing flood risk including costs associated with changes of land use provide benefits which are enjoyed more widely downstream; there is no immediate or easy transaction to link the costs of provision to the benefits of impact.

In some cases improved regulation might help to deliver elements of these challenges, particularly where market based activity is producing negative externalities, for instance in relation to the routine and widespread pollution of water courses by intensive farming and forestry practices. However, this needs to be balanced with the costs and ease of enforcement. Regulation which provides apparent protection of resources, but which cannot be enforced, or is not enforced, is of little value.

Whilst in principle 'markets' could be generated for the supply of some of these e.g. increasing carbon stores, in practice there is often market failure in their delivery. There may be opportunities for corporate or community engagement where the beneficiaries are sufficiently proximate to the issue. For instance water companies have an interest in reducing the costs of water treatment through the improvement in land management up stream. This can provide a direct incentive for supporting changes to land management practice. In a similar way, communities affected by flooding might collectively support measures to reduce risk.

Whilst we believe the Welsh Government needs to be open to a range of measures which support actions which underpin addressing the challenges, as a matter of principle Government or other public funding should be targeted to the delivery of public goods as identified within the challenges and not to support goods and services for which there is a clear market.

- 4. We believe the Natural Resources Policy needs to make clear as a matter of principle and in taking forward measures and incentives for delivery, that these reflect the balance of public good provided.**
- 5. A barrier to activity is that mechanism and incentives fail to reflect the public benefits or dis-benefits which derive from land use/land management choices. Setting mechanisms and incentives at a level which reflects the value of existing income foregone can fail to deliver the scale of opportunity available for public goods**
- 6. The Natural Resources Policy should outline a range of options and opportunities for delivering activity with public benefits, including a range of possible funding mechanisms.**

In a similar way to the interconnectedness of issues outline above, the management of natural resources and delivery of the benefits this provides needs to be considered at an appropriate scale to reflect the issue. With water resources this may be at a catchment or

sub-catchment level, with air quality it may reflect the intensity and distribution of livestock units, for connectivity it will need to consider the distribution of existing habitats etc.

Area Statements will of course need to reflect these variations in scales. However it is important in our view that mechanisms and incentives for action also reflect the appropriate scales which result in both appropriate and sufficient action to make a significant difference.

In order to make discernible impacts some land management or land use changes may need to occur at sufficient volume to meet thresholds – for instance to achieve effective connectivity for wildlife or provide adequate buffering of water resources. To ensure that interventions are on a sufficient scale to make a difference it may be necessary to design mechanisms and incentives to reflect the value of the public benefits derived, rather than simply the value of the current uses foregone.

**7. We believe the Natural Resources Policy needs to make clear that mechanisms and incentives for activity which reflects the spatial scale and level of public benefits derived, rather than simple universal mechanisms and incentives.**

The interim Natural Resources Policy listed the need for maintaining productive capacity. There is a risk that this statement is interpreted to mean traditional historical view of production based on market goods from farming and forestry. Whilst these are clearly important, we feel the policy needs to make clear that ‘productive capacity’ refers to the whole gambit of ecosystem services from which society benefits, including water, air, recreation, biodiversity etc.

We also feel the Policy needs to make clear that notion of maintaining production has a critical temporal dimension in relation to the well-being of future generations. The SoNNR report makes clear that some natural resources, most notably soils and water management, are being degraded by current levels and types of land use. Maintaining productive capacity therefore represents the maintenance of a range of outputs from natural resource management to meet the needs of future generations across Wales, rather than maintaining agricultural or other production at current levels were this has negative overall impacts

We believe that continued farming and food production in Wales is best supported by a farming industry which provides a wide range of public goods from land management. This would include slow, clean water, connectivity for wildlife, carbon storage and attracting sustainable tourism.

The integration of trees, woods and other habitats into farming systems offers the opportunity to produce high quality and distinctive food and food products while also delivering a range of critical ecosystem products and services. We would expect that this would be recognised through the mechanisms and incentives available.

**8. A barrier to more sustainable delivery is the way in which productive capacity is too often conceived as the continued support for existing business models which**

**may be both economically unsustainable and environmentally damaging. An example is intensive single species clear-fell forestry.**

- 9. The Natural Resources Policy needs to be clear that maintaining productive capacity relates to the range of goods and services, including but not exclusively food production, which serves the future well-being of people across Wales.**

As the Consultation suggests operating at a landscape scale requires more than simply the protection of existing designated sites, and encompasses new restorative and creative approach which buffers, extends and connects remaining habitat. We strongly support the need to build a better case for support for this action. The Natural Resources Policy should emphasise that this is not solely about the adaptation of wildlife, but the resilience of a wide range of ecosystem services which would result from the development of a truly landscape scale approach.

Whilst funding from a variety of sources will be needed to deliver such a vision, any central government funding or funding which replaces the current CAP based funding stream needs to reflect the necessity for collaborative activity which meets landscape scale challenges. This might include collaboration amongst existing landowners and tenant, but might also be with communities, and businesses which benefit from the outputs provided.

The wide range of benefits which derive from landscape scale working should be reflected in the Natural Resources Policy and in the support mechanisms which help it to be delivered.

- 10. A barrier to activity is that mechanisms and incentives for support normally operate at a farm/site scale, rather than as a result of collaborative action across landscapes which meet the threshold needed for effective landscape scale action**

- 11. The Natural Resources Policy should emphasise the need for landscape scale action by making mechanism and incentives contingent of collaborations at a landscape scale.**

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

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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## **Detailed NRP consultation response from Sustainable Management Scheme and Nature Fund delivery partners**

This annex contains the written up individual contributions captured at the workshop from all stakeholders. Participants were split up into three groups, which are documented below.

### **Summary from group 1**

#### **Session 1**

Focus on the nine challenges.

Safeguarding and increasing carbon stores, restoring peatlands

Opportunities

- Delivery through connections with local groups – it would be helpful if there was a mechanism to find more and connect with local groups; some groups may be too small to apply for big schemes but may have capacity to deliver and contribute towards common goals.
- The importance to find local activists/willing individuals to help with the application process for schemes/grants; access to resources; access to expertise; co-ordinating volunteers.
- Potential for LBAPs (should they be renamed) to provide a good starting platform but need for revision.
- Landscape based – it would be good if the landscape based approach could be mirrored by funding, i.e. access to funding from different pots to realise multiple benefits but at the same time have flexibility on timescales.
- Link up with green exercise – ill health prevention, ease burden on the NHS, physical and mental health benefits; break down isolation; cure whatever the problem is rather than dealing with the symptoms of the problem.
- Perceptions of green space – some people living near a green space may feel they don't have permission to use it; allow flexibility around the use of green space.
- A need for exit strategies – ensure projects are sustainable post funding – move from “innovative pilots” to “spreading best practice” - become business as usual.
- Change attitudes – move from ‘what are you going to do’ to ‘what can we do’.
- Importance of volunteering and community engagement.
- Size of projects – certain actions like peatland restoration needing big input to deliver.
- Productive capacity isn't just agriculture but should include wider economic activity

## Barriers

- Decision making mechanisms to achieve holistic balance – you get what the decision making tools measure – still economically driven at present?
- Decision making tools should prompt the right decisions – example of CRT environmental assessments – started as a justification for what was going to happen anyway – now pushing positive improvement
- Barriers to achieve this challenge are inappropriately placed developments including renewable energy; tree planting where trees shouldn't be planted; NRW licensing system; forestry policy. – need whole life considerations; carbon balance e.g. loss of carbon store vs carbon benefits of wind farm
- Relationships with regulators including NRW.
- Continuity of funding; funding cycles.
- Too much emphasis on innovation – innovation is not always necessary, judgement call.
- Allocation of funding which may not mirror the area based approach.
- Silo policy areas / budget allocations.
- Organisational culture – fear that collaboration may lead to job losses, e.g. where two teams amalgamate and only one leader will be required.
- Funding cycles – benefits realisation – long term approach – necessary evaluation may be outside the funding period.
- Too many criteria to access schemes or their focus is too limited, e.g. LEADER which has a strong RDP focus and relatively little flexibility.
- Evidence from funding not always available in time for the next funding scheme.
- Language – labelling of groups, themes, being exclusive.
- Reliance on funding and drive of individuals.
- Difficulties to achieve scale – the need to find partners associated with the areas where the funding is coming from; future proofing partnerships.
- Buy in from landowners or land managers.
- Project management – change in team members may mean the end of the project – what processes are hindering delivery.
- Attitudes towards risk – risk taking needed to do things differently if outcomes not achieved don't label up as failure but learn from what didn't work and improve on it next time.
- Legislation/licensing.
- EU funding – size of organisations to be able to apply/access funding
- Health and safety.
- Tapping into local groups – need someone to act as convener (strength of CRT in its own realm)

## **Summary from table 1**

### **Session 2**

Focus on the three priority themes.

- Accelerating green growth
- Delivering nature based solutions
- Landscape based

#### Accelerating green growth

- Possible negative impacts of infrastructure projects like wind farms.
- Use of language – any growth should be green, any growth is green growth, table suggested “greening” growth.
- We need to be mindful not to exploit natural resources for green growth? Or not to exploit at the expense of future generations.
- Flexibility to find the right opportunities for green growth.
- Ensure the environment is prioritised and doesn’t come second to the economy – surely WoFGA seeks to ensure equity / environment / economy have equal billing – there may be compromises required but there should be a balance across Wales.
- More clarification needed on what is included in green growth.
- Ensuring a balanced weighting of monetary value vs the environment - debated monetisation as a basis for decisions – needs a mechanism for weighing one project against another which may have very different balances equity / environment / economy.
- Green / blue infrastructure – clarity and linking up on this within Welsh Government, e.g. with the infrastructure fund and opportunities for multiple benefits beyond tourism, making connections with species, areas and pollinators, communities and health
- Difficulty to retro fit green infrastructure when there is not enough space – Greening Grangetown is an exemplar; Mon & Brecon canal another.
- Useful to see international examples to help tackle problems with planning and application processes – ties in with globally responsible Wales (globally aware Wales / Wales as a global leader in this area of thinking?).
- Opportunity to link with programmes like 21<sup>st</sup> Century Schools, as well as the NHS on greening their estate – Welsh Government / public sector to be exemplars.



- Make green infrastructure a standard requirement for new developments, especially public buildings and also make the link with well-being objectives.
- Barriers to green infrastructure from planning and finance (affordability) – e.g. lead in times required to ensure house builders don't overpay for land given increased infrastructure costs, may then need added incentives (carrot / stick) to ensure availability of land .
- Revisit the roles of the Welsh Government and Local Authorities with developers in the context of green infrastructure. It was felt that green infrastructure often didn't happen because developers would say that they haven't got money for it; also review target setting in this context.
- Welsh Government should become an exemplar of green infrastructure; symbolic/flagship.

#### General comments on themes

- Importance to understand the themes as interlinked, and that the themes are linked to the challenges.

#### More general comments on the NRP policy

- A recommendation to have regular reviews of the policy with stakeholder input/engagement.
- WoFGA and the suite of Acts seek a change in culture and behaviour therefore need to follow a cultural change programme:
- Education / culture — the challenge is achieving cultural change through behaviour change: Exemplars; Consistency; Celebrate
- Introduction of a national reward scheme – awards and associated publicity, e.g. Ministers talking about it, giving it media presence.
- Include actual good examples for stakeholders to use and learn from.
- Strengthen links with Education and curricula activity – make the new approach the norm.
- Language – move away from jargon to engage a wider audience whilst ensuring to be technically accurate; different documents for different audiences (note very different language used by, say, heritage and environmental sectors – create a barrier to joint working / understanding – see Heritage Exchange and RSA / HLF initiative).
- Emphasise the importance of collaboration and associated learning opportunities and exchanges of expertise.
- Importance for the policy to set a direction for delivery as well as influencing a culture and behaviour change.
- Policy delivery – redeployment of savings made by reducing the number of / increased cooperation by Local Authorities – i.e. redeploy savings among LAs so it is about value for money not costs saving

- Observation: the presentation of the nine challenges in boxes seemed to reinforce the established 'tick the box' thinking – perhaps redraw as overlapping circles.

## **Summary from table 2**

### **Session 1**

Focus on the nine challenges.

#### **Barriers/challenges.**

- Making PES work, having working examples.
- Conflicting interests.
- Selling the idea. Foreg.Tidal Lagoon have sold the idea of Swansea well. Learning the lessons of good public relations and building education and understanding.
- Some opportunities, but also some potential restrictions within designated areas, if looking to diversify.
- 'Retain the distinctiveness....'
- Are we clear what a natural/historic landscape is?

#### **Opportunities**

##### **Reducing the risk of Flooding**

- Reclaiming floodplain→long term.
- Green Engineering (nature based solutions) e.g. large woody debris.
- Incentives to farming – Insurance companies paying farmers?
  - Challenges: potential loss of grazing leading to reduces stocking density.
  - Has to be a long term incentive.
- And income stream that is in addition to food production.
- Premium to recognise being a responsible custodian.
- Winning hearts and minds (social media) to tell the story.
- Diversification
- Positive Communication /messages (linked to education), e.g. 'Carbon neutral lamb' – could be the direction we could go.

## **Summary from table 2**

### **Session 2**

Focus on the three priority themes.

- Landscape based

### **Accelerating green growth**

- Is this the right term? --> It means different things to different people. Clarity needed.
- 'It's about creating economic opportunities through SMNR'.
- Action: Guidance/examples needed to explain what this means.
- Examples: 'Carbon neutral produce', 'carbon free land tours'.
- **Step Change**
  - Dealing/working with people.
  - Finding opportunities for new markets and having the right skills and support to do this.
  - Skilled marketing.
  - Appropriate training for social media.

### **Delivering Nature Based Solutions**

- Multiple benefits and these have to be demonstrated to get buy-in.
  - Tourism – income opportunities
  - Water quantity and quality
  - Recreation opportunities and wellbeing.
  - Health
  - Social cohesion
  - Biodiversity
- Opportunities
  - After establishment of a coastal path resources should be directed to creating business opportunities along that path.
  - Case study to demonstrate landscape scale collaboration.
  - Soft engineering as opposed to hard engineering.
- Challenges
  - Evidence has to be up-to-date.
  - Softer engineering can be harder to evidence.
- Capacity to be able to change e.g. farmers and their time.
- It's not always about jumping to solutions; time/dialogue might be needed for something to be sustainable.

### **Summary from table 3**

#### **Session 1**

Focus on the nine challenges

Theme – Maintaining our Productive capacity

WATER – Is it of the right quality?

#### **Barriers**

Slurry – Phosphates – sewage – nitrates – domestic cleaning products – garden chemicals – peat – slug pellets – glyphosphates

#### **Actors**

- General public (including groups such as gardeners, farmers and landowners, anglers and boaters)
- Dwr Cymru and other water companies
- Business, industry
- Conservation bodies
- Riparian landowners
- Glandwr Cymru / Canal & River Trust

#### **Mitigation – SMNR solutions**

- Active land management esp. upland moorland
- Creating blanket bog and ponds
- Good, targeted grazing
- Forestry management – not too close to reservoirs, water courses
- Buffer areas – identify unproductive areas that are useful for wildlife
- Recreate natural systems of filtration
- Arrest topsoil run-off and degradation thus avoiding problems downstream
- Re-introduction of beavers?
- Tree planting
- Hedge connectivity and preservation
- Avoid “one size fits all” Glastir schemes. Need more flexibility to adapt to individual circumstances
- Give responsibility to landowners to get on with the job

## RETAINING THE DISTINCTIVENESS OF OUR PLACES AND HISTORIC LANDSCAPES

### CHALLENGES/BARRIERS

- Rural/urban divide – need to bring country / narrative into towns
- Cost of fencing as opposed to stone-walling
- Do we value these assets enough?
- SSSI payments have reduced – are the implications of NRW cost-cutting understood? [Also cuts in NRW Education budget]
- Public access brings additional costs such as erosion. Need to raise awareness among urban dwellers of their personal responsibilities
- Planning problems in National Parks
- Inertia of central government
- People not experiencing therefore not appreciating / understanding and therefore not wanting to protect
- Climate change impacting on heritage – canals / transport infrastructure / reservoirs etc. – which contribute a sense of place
- Shortage of traditional / appropriate skills

### MITIGATION

- HLF widening its remit
- Charging the public to “use/consume” national resources OR should nature be “free for all” with costs being borne from general taxation?
- Limiting access to esp. Pen-y-fan or Snowdon
- Diversification by farmers but there are problems such as planning
- Restore woodlands/orchards/ponds/hedges
- Change curriculum to teach more local and Welsh history to reconnect people with their past – learning outside the classroom on their doorstep – understanding and appreciating therefore using & protecting local green / blue spaces
- New structures should be built in keeping with local landscape
- Maintain traditional skills such as game-keepers to keep local jobs
- All new buildings should have solar panels, built-in bird hotels etc
- Ask how much people would be prepared to pay for clean air, water, wildlife. Needs government campaign
- Link eco-system services to everyday life experiences
- PES?
- Re-wilding but in limited areas only starting at the bottom of the eco-system

### **Summary from table 3**

#### **Session 2**

Focus on the three priority themes.

#### **GREEN GROWTH (GG)**

- Shouldn't only refer to inward investment – should refer to local economy as well (see too Deep Place studies – looking at supporting the Foundational economy)
- GG needed to keep young people in rural areas
- Welsh Government should use devolved tax rates to reward entrepreneurship and innovation
- Reliable and fast broadband
- **ALL** growth should be green growth
- Shouldn't cover the landscape with pylons

#### **DELIVERING NATURE-BASED SOLUTIONS**

- No joined-up thinking in the NHS means that people aren't aware of the benefits that natural resources can bring (cultural differences between preventative and curative disciplines – see also NHS Scotland / Forestry Commission Scotland report on “greening” their hospitals for better cure rates)
- Need to involve hard-to-reach groups in the general public (those furthest from exercise show the greatest benefits – but actions may not be reflected in national statistics due to small sample size relative to the whole)
- School influence is vital but must be backed up by families e.g. litter
- Restrictions on waste disposal lead to fly-tipping increase. LA sites must take a wider range of waste

#### **LANDSCAPE-BASED SOLUTIONS**

- Farm cluster groups are developing
- Farmland bird count is good but take care that RSPB doesn't swamp other voices
- Could use Land Care scheme from Australia – very successful
- Young farmers use social media more and so must reach out to them

**NEW PRIORITY** – all policies must be based on sound evidence and evaluation



### **Three key messages**

1. Raise awareness among general public of NR benefits.
2. Involve hard to reach groups.
3. Connect urban dwellers with rural dwellers.

### **Other comments**

*Improving quality and connectivity of our habitats* – this needs to include specific reference to species.

*Maintaining our productive capacity* – needs to include wider economic development and jobs, not just agricultural sector.

No one size fits all approach to nature and central government don't get that: need flexibility.

Culture/behaviour change should be a key challenge.

## Consultation Response Form

Your name: **SMS and Nature Fund delivery partners:**

Tim Bowie, Meyrick Estate Management Ltd

Heather Galliford, RSPB

Tom Jenkins, Forest Research in Wales

Andrew Stumpf, Canal and River Trust

Dr Glenda Thomas, FWAG

Christian Servini, NRW

Helen Minnic-Smith, Welsh Government Agriculture

Colin Cheesman, Plantlife

Arwel Jones, Gwynedd CBC

Andrew Osborne, Torfaen CBC

Rebecca Sharp, Neath-Port Talbot CBC

Guto, Fferm Ifan

Ben Reynolds, Trilein

Catherine Hughes, Am Gymru

Sarah Kessel, The Wildlife Trust of South and West Wales

Steven Bradley, PLANED

Jonathan Terry, Environmental Consulting Forestry & Arboriculture - Planning –  
Litigation

Paul Stephens, Game & Wildlife Conservation Trust

Drew Love-Jones, International Wildlife Consultants Limited

Jo Oliver, International Wildlife Consultants Limited

Dewi Thomas, Caerphilly CBC

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.

This response contains the feedback from Sustainable Management Scheme and Nature Fund delivery partners who individually provided comments and feedback but also collectively identified key challenges and barriers in relation to the key challenges and priority themes.

Collectively partners identified a lot of possible suggestions under the three themes and support for working at a landscape scale.

The views presented are participants' individual views and those of a similar nature have been grouped. The annex contains their detailed responses which can be kept and used for where this group felt activity could be taken forward quickly.

## **Key messages**

Cultural Change should be included in the new policy as one of the key challenges.

All growth should be green growth – the importance to position the environment in relation to the economy.

The importance for the Natural Resource Policy to set a direction for, and enable, delivery.

## **Detailed messages**

### **Delivery**

Move away from 'them' and 'us' to 'we' to be truly joined up.

Encourage local communities and individuals to get involved in action on the ground, to get their buy-in and in turn increase the sustainability of projects beyond funding cycles.

Understand the value of good relationships and working with people to get their buy-in and deliver successfully; and acknowledge the importance of volunteering and community groups.

Encouraging diversification and increasing capacity for diversification.

Need to change attitude towards risk to enable new ways of delivery and learning.

Make green infrastructure a standard requirement for new developments. Find long-term solutions even if more costly initially.

Acknowledge the time/dialogue needed to develop a more sustainable solution.

### **Language**

It is important to move away from jargon not to alienate certain audiences.

Careful phrasing, any growth should be green growth, and how the policy talks about the environment in relation to the economy, there won't be an economy without the environment.

## **Funding**

Allow more flexibility on funding cycles to enable effective delivery.

Funding approaches should mirror an area based approach, pooling funding from different policy areas if appropriate, e.g. Health, Transport and Education.

## **Barrier**

A potential hurdle to collaborative, landscape scale approaches could be organizational structures, for example two teams in different local authorities may be asked to merge and there will be only one leader needed. Whilst people understand the need and the benefits of collaborative working they fear for their job security at the same time.

## **Other comments**

*Improving quality and connectivity of our habitats* – this needs to include specific reference to species.

*Maintaining our productive capacity* – needs to include wider economic development and jobs, not just agricultural sector.

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

## Consultation Response Form

Your name: Hannah Woodrose

Organisation (if applicable): Valpak Limited

email / telephone number: [Hannah.woodrose@valpak.co.uk](mailto:Hannah.woodrose@valpak.co.uk) / 03450 682572

Your address: Valpak Limited, Unit 4 Montague House, Stratford-upon-Avon

Business and Technology Park, Banbury Road, Stratford-upon-Avon,

Warwickshire, CV37 7GW

**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.

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

Valpak Limited is the UK's largest producer responsibility compliance scheme operator with member schemes for the Packaging, WEEE and Waste Batteries regulations. In addition we provide our members waste management services, as well as Carbon Reduction Commitment (CRC), Energy Savings Opportunity Scheme (ESOS) and other environmental areas such as sustainable development consultancy and international compliance.

We are pleased that Welsh Government are consulting on the development of the Natural Resources Policy, and have included resource efficiency within the priority themes. Within the waste and recycling sectors there are a range of products and materials which could be suitable for increased resource efficiency opportunities.

In our role as a producer responsibility compliance scheme operator we have produced, with WRAP, and with input from industry, a number of <material>Flow reports which provide in-depth research to the flow of specific materials onto, and from, the market. The reports have covered a number of materials, including glass, plastic, wood, metals and EEE, improving the accuracy and understanding of national data.

In light of the Circular Economy Package we are also working on a new Flow project, PackFlow 2025 (due to be published Spring 2017). This report intends to assess the feasibility of the proposed Circular Economy Packaging Waste Directive targets, the strengths and weaknesses of the current system and if there are any possible improvements, and make recommendations for improvements and enhancements, and help to inform the discussions around future policy options.

As the vast majority of our customers and members operate at least UK-wide, and often internationally, our general approach is to propose that policy initiatives which involve industry work best at a national level, coordinated between Welsh Government, UK Government, other Devolved Administrations, local government and industry. This minimises unnecessary administrative burdens and therefore helps keeps costs under control.

We would be keen to work with Welsh Government over the coming months to look at how these policies could be taken forward, for example how Producer Responsibility might best be evolved at a UK level to meet the particular requirements and priorities of Wales.

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

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:

☐

## Consultation Response Form

Your name: Rebecca Brough

Organisation (if applicable): **Ramblers Cymru**

email / telephone number: [Rebecca.brough@ramblers.org.uk](mailto:Rebecca.brough@ramblers.org.uk)

Your address: 3 Coopers Yard, Curran Road, Cardiff, CF10 5NB

**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.

Over the next 10 years, Ramblers Cymru's ambition is to make sure everyone can enjoy the outdoors on foot, and that the right infrastructure and support is in place. In addition to working to protect and improve the public rights of way network and increasing access to open countryside, we want to help communities to protect their landscapes from inappropriate development, whilst balancing this with other community needs, such as economic prosperity.

*'Improving health and equity through access to good quality green and blue spaces';* and *'retaining the distinctiveness of our places and historic landscapes'* were challenges originally identified in the 2015 Natural Resources Policy Statement. These challenges remain relevant and integral to the proposed priority themes of:

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



- Improving community and individual wellbeing by taking a place and landscape based approach”

Secure and lasting access to the countryside with a vibrant, well-maintained and well-used rights of way network is a key to delivering on these priority themes.

To achieve this, the Natural Resources Policy must facilitate improved public education about access opportunities; support other policies to promote the benefits of physical activity; and safeguard the environment and green infrastructure for outdoor recreation.

The National Resources Policy must recognise and support our historic rights of access and our path networks.

In the context of the decision to leave the European Union, sustainable and meaningful access to the countryside must be a fundamental part of any new agriculture and rural support regime.

Public money must support public goods, and compliance with statutory responsibilities for access must be a prerequisite for those in receipt of public funds.

Improvements to access should also be permanent, not temporary, as has been the case with permissive access under schemes like Glastir. National Resources Policy must deliver the best long-term outcome for public funds. Connecting people to the countryside, and helping farmers to deliver permanent public access, will ensure both local economic benefits and population public health benefits.

The Natural Resources Policy must recognise the rights of way network as an important part of our historic environment, a crucial part of our green infrastructure, and a way of linking communities to their green and blue spaces.

Open access land is also an important component of our landscape, and any change to land use, for example increased forestry cover, must be predicated on the principle that public access opportunities are created.

The definition of open access land, under the Countryside and rights of Way Act 2000, should be extended to give access to more land types, such as woods and coastal cliffs for recreation. This will contribute to tackling the health and inactivity issues Wales faces.

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

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:

☐



NATIONAL PARKS WALES  
Britain's breathing spaces

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February 10<sup>th</sup> 2017

### **National Parks Wales' Response to the *National Natural Resources Policy Development***

National Parks Wales welcomes the opportunity to respond to the Welsh Government consultation, *National Natural Resources Policy Development*. The three National Park Authorities (NPAs) in Wales work in partnership to collectively respond to policy issues with the potential to influence the management of Wales' National Parks, and have produced this officer-led response to the consultation.

The National Parks, and other protected landscapes in Wales, for example the Areas of Outstanding Natural Beauty (AONBs), present a compelling, evidence-based approach to natural resource management. Along with colleagues in the AONBs we would welcome any opportunity to work with the Welsh Government to deliver the Policy within the context of the Well-Being of Future Generations and Environment (Wales) Acts.

In the following tables we answer the two questions in the consultation and offer a range of other observations and suggestions (Additional Comments). We also draw your attention to the close fit between the governing principles for Wales' protected landscapes and the principles of sustainable natural resources management (Table 1).

Recurring themes in our comments are that Wales' ecosystems are already in a sub-optimal state, requiring upfront action to put this right; that more action is required in the wider countryside; and that to deliver the policy ambition requires first a larger and more skilled work force, which itself adds a different dimension to the green growth agenda, and secondly a more balanced spend on the management of natural resources given their GVA contribution to Wales' economy and well-being.

Dr Paul Sinnadurai  
Conservation Manager  
Brecon Beacons National Park Authority

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*For and on behalf of officers of National Parks Wales and*

*Wales' Areas of Outstanding Natural Beauty.*

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Parciau Cenedlaethol Bannau Brycheiniog, Arfordir Penfro ac Eryri yn gweithio mewn partneriaeth  
Brecon Beacons, Pembrokeshire Coast, and Snowdonia National Parks. Working in Partnership.

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## **The two questions asked in the consultation:**

- A. The key steps that need to be taken in order to deliver on the priority themes and address the key challenges
1. We suggest that the NR Policy includes recognition that, owing to historic factors, Wales' ecosystems are already unlikely to be resilient. They exist as a consequence of evolution and interaction and their current status, or resilience, is affected directly by historic and current anthropogenic impacts. The challenge remains, therefore, for humans to live within their means and to permit all creatures to continue to thrive, irrespective of their deemed value. This underlines the value of ecological footprints and carrying capacities.
  2. Grow the sector and skills pool for sustainable natural resource management (the other part of green growth).
  3. Best practice examples (in particular schemes that have demonstrated best practice in relation to conservation and landscape), and support for, community energy schemes where landowners work with the local community to generate and benefit from renewable energy.
  4. Incentives for reducing food miles by supporting viable local markets for high quality produce.
  5. Expand the regulatory screening process. Whilst SEA and Sustainability Appraisals are retained (EU departure implications), these can be adjusted to include screening in accordance with the WFG Act objectives and goals and the principles of sustainable management of natural resources in the Environment (Wales) Act.
  6. The NR Policy should include a periodic review of existing and historic decisions, policies, programmes and incentives that contradict these goals, objectives and principles.
  7. Given the GVA contribution that Wales' natural resources make as explained in the consultation, and the costs associated with the restoration and enhancement of Wales' habitats of principal importance (Section 7 list), including reversal of the unfavourable condition of most of Wales' N2K sites, as well as the significant costs associated with managing basic infrastructure in order to encourage access to green spaces (i.e., rights of way, toilets and car parks), it would be beneficial to adjust the balance of spend in Wales to ensure that the environment's full health and well-being benefits are realised. Perhaps there is room for example within the £6.848 Billion departmental allocation for Health, Well-Being and Sport to invest in the health and well-being benefits of sustainable natural resources management and nature recovery. Otherwise these aims must rely on the fraction available within the £0.269 billion allocation for Environment and Rural Affairs (which is itself just 4% of that for Health, Well-Being and Sport), throughout the 20,000 sq.km of Wales during the same period. Perhaps the sustainable management of natural resources, and the multiple benefits to the country's Well-Being, deserves a better deal per unit area.
  8. There may be a weakness in the assumption that future expenditure on natural resource management can rely so heavily on PES schemes. PES schemes themselves will not bridge the financial gulf for biodiversity



conservation and multiple benefits delivered, and developing the appropriate PES partnerships risks detracting from other crucial partnership work. The Welsh Government has made the sustainable management of natural resources (SMNR) a core duty for itself and for the entirety of the public sector. This now, perhaps, presents a disincentive to the private sector contributing voluntarily to SMNR because core duties are usually not eligible for third party support. At the 2016 IUCN Peatlands Conference in Shrewsbury, it was widely understood that the private sector is unwilling to 'bail out' the public sector without seeing the colour of the public sector's equity stake.

9. So adjusting the balance of spend in Wales appears necessary.
10. Area Statements will be a key mechanism in delivering the key themes and addressing the key challenges on a regional scale. Wales' protected landscapes (its National Parks and Areas of Outstanding Natural Beauty) are the areas where the themes and challenges are crystallised and most prolific, and careful consideration, therefore, needs to be given to responsibilities and ownership over Area Statements within these areas. Given the track record of protected landscapes on successful outcomes delivery, integrating Area Statements into Partnership Management Plans would seem to be the most obvious and effective solution.

**B. The barriers that need to be addressed**

11. The NR Policy must set out a clear plan for achieving all 20 of the Aichi Biodiversity Targets enshrined in Strategic Goals A-E, including a periodic analysis on why Wales has missed many of the targets. The latter might be usefully included in the periodic and post-election reviews of the NR Policy. Given the international recognition that Wales has received for the WFG and Environment (Wales) Acts, it is important both to set and to maintain a good example.
12. SMNR will always rely on biodiversity conservation in the wider countryside, which still requires greater investment and understanding.
13. Reference to the 2011 Lawton Review is most welcome. Living up to its recommendations requires a larger, more skilled workforce, with more spending power. A priority, therefore, for the NR Policy, is to grow the workforce and to emphasise this aspect of "green growth" as an opportunity for Wales. Using this form of green growth will widen participation and understanding of natural resources management.
14. Given that improvements in education and health are frequently driven by expenditure, Wales needs to be honest about the analogous impact on improvements achievable for SMNR and nature recovery, including addressing the country's skills deficit to deliver on the wider remit of SMNR.
15. Furthermore, expenditure is frequently influenced by public/business/political perceptions and opinion. The way we talk about, promote and educate on SMNR is, therefore, critical. The language and approach used must be accessible, inspirational and easily understood. Fostering a national desire to protect and enhance our natural resources



for future generations is key to the success of SMNR. Consideration is required, therefore, on whether the public is more likely to be engaged by terms like “sustainable management of natural resources” versus “helping nature/wildlife to recover.”

16. Recognise that nearly all practical responses to natural resource management and management at the landscape scale, will still be delivered at the human scale, i.e., it will progress at a rate directly proportional to the amount of work that a single person or single land management business can achieve each day. So the more people and businesses involved, the faster the progress. Cultural motivation is an important factor too for individuals, businesses and conservation organisations, who might currently be motivated by differing histories and economic imperatives. Ideally, SMNR should be rolled out in a way that enables sectoral motivations to converge through enlightened thinking.
17. Climate change is already affecting Wales’ biodiversity adversely and the Policy needs to emphasise this.
18. Addressing the effects of invasive non-native species (INNS) is a full time undertaking that has yet to be met by full time effort. The SoNaRR emphasises the exponential costs of INNS management. Yet there might be significant benefits to biodiversity restoration from a large, targeted and sustained increase in INNS management in relation to natural resources management.

### **Additional comments:**

- |  |   |
|--|---|
| <p>C. The close fit between SMNR principles and Wales’ protected landscapes:</p> | <p>19. National Parks, with National Park Management Plans, and Areas of Outstanding Natural Beauty, with AONB Management Plans, are already available for Wales to implement and fully test the SMNR principles. Table I provided with this consultation response illustrates the easy and close fit between the principles of SMNR and the management principles for Wales’ protected landscapes. The SoNaRR, however, refers to National Parks just once, as visitor attractions. They are much more than this, which has been exemplified in the findings and recommendations of the draft Future Landscapes Review published in November 2016.</p>   |
| <p>D. Risky assumptions about natural resources</p>                              | <p>20. It is important to continue to emphasise the intrinsic value of natural resources and ecosystems (Section 4f of the Environment (Wales) Act 2016), and to recognise that in terms of intact biodiversity and ecosystems, the UK is ranked 189 out of 216 countries assessed, i.e., near the bottom, in the State of Nature Report 2016. The major causes for this continued chronic poor health remain the influences of national policy and global markets on agriculture and the effects of climate change, which again suggests that there may be more to gain for Wales from a closer working relationship between Health, Well-Being, Sport and Sustainable Natural Resources Management. And this would chime closely with the purposes of Wales’ protected landscapes.</p> <p>21. Whilst reference to “our” natural resources is helpful in terms of engendering a sense of custodianship, we believe that the NNRP must also</p> |





stress the intrinsic value of things. The Environment (Wales) Act refers to *the* rather than *our* natural resources.

22. Many features of the natural environment are already in an impoverished state, so sustainable management will actually focus on recovery here.

E. Risky assumptions about management of natural resources

23. The SMNR principles are sound and good but there may be too high an assumption that safeguarding relies on our ability to “manage” *per se*. Often the appropriate ‘management’ is to remove or reduce human interference and/or exploitation and this will frequently be the key to sustainable natural resources management and nature recovery in the wider countryside. Recognising this distinction also avoids the risk of focusing solely on the designated sites (SSSIs, N2K etc.) and might instead help to achieve the fundamental shift in public and private attitudes to achieve the desired goals. Some humility is necessary therefore, in Wales’ *relationship with its natural environment*, which is what is really being discussed.

24. The approach to SMNR described in the consultation talks about *reduce the pressures... such as resource efficiency...* This explanation needs to be strengthened considerably. Rather than just *reduce* pressures, it is about avoiding and reversing pressures and damage too.

25. Wales’ and Britain’s biodiversity, and indeed that of Western Europe, is already impoverished, with a lot of the damage wrought through implementation of the CAP and CFP. It is questionable therefore, whether there are many, or any “healthy, resilient ecosystems” in Wales. Their vulnerability to adverse change is increased by the impacts of climate change. So the Policy needs to prioritise restorative actions; the Nature Recovery Plan is a start. Reporting progress towards the 20 Aichi Targets will take Wales further.

F. The role of agriculture and land ownership

26. Most of Wales’ *natural resources* are on privately owned land and farmland. Departure from the EU means departure from the CAP and CFP. The NR Policy should therefore play a strong role in Wales’ follow up to this. There are opportunities for example to ensure that future costs of remediating environmental degradation from agriculture, commercial fishing, aquaculture and development are internalised by the industries, rather than externalised to the public purse as they are currently. Sectors bearing the full costs would make SMNR and fulfilment of National Park purposes more affordable.

27. When considering future mechanisms, we believe that within National Parks and AONBs, a stronger working link could be established between landowners and farmers on the one hand and landscape conservation organisations such as National Park Authorities, AONB Boards, and NRW, on the other. This approach could focus on direct payment to those providing and enhancing public goods (i.e., natural resources), with e.g., National Park Authorities & AONB Boards working with NRW to determine priorities and commissioning the works directly using specifically allocated public funds.





- G. The coastal and marine environment
- H. Green growth is also about increasing Wales' scale, investment and involvement in biodiversity conservation
- I. Place-based and landscape-based approaches
28. The consultation process needs to involve more representation from this sector.
  29. Building on the policy challenges set out in the Natural Resources Policy Statement 2015 will require a significant scaling up of the people (workforce), skills and cash available for biodiversity conservation.
  30. Accelerating green growth, which is currently defined as “increasing resource efficiency, renewable energy and supporting innovation,” will benefit from being defined more widely than this consumption-based definition. The evidence cited in the SoNaRR about Wales’ declining biodiversity means that the principal focus must remain on biodiversity restoration, aka Lawton Review recommendations. Otherwise biodiversity will not recover to the point that it underpins resilient, functioning ecosystems and healthy natural resources. Maintaining and indeed growing this focus, to keep pace with Wales’ ambition and with the pace required to achieve Aichi Targets, requires a larger workforce engaged directly with biodiversity restoration.
  31. It can be argued that biodiversity restoration needs an “industrial scale” response, which would be assisted by an adjustment in spending priorities (see A.7 above).
  32. Through their National Park Management Plans and the local, regional and national partnerships established, National Park Authorities lead the way on sustainable natural resources management at a landscape scale and can cite numerous industry-leading examples past and present. They set a level of ambition for SMNR within areas and, as a consequence of their management principles (Table 1), provide solutions for other pressures and ambitions affecting local and regional economies, the historic environment, health, well-being and recreation. The Brecon Beacons National Park Authority, for example, is the first in Wales to develop Place Plans for settlements; and each National Park is also described in Landscape Character Assessments, which are useful templates for landscape-scale place plans. A nationally significant place-based and region-based approach may emerge through the Brecon Beacons Mega-Catchment concept being developed by Dŵr Cymru Welsh Water. The National Park Authorities are also very active in the RDP Sustainable Management Scheme (Managing Resources Sustainably in the Black Mountains, Realising the Natural Capital of Welsh Peatlands, Building Resilience in Catchments), and Glastir delivery. The Pembrokeshire Coast NPA manages its own estate and works in partnership with private landowners through its “Conserving the Park Scheme,” covering over 100 sites and almost 4,000 ha. The programme incorporates projects such as “Pwyth Mewn Pryd/Stitch in Time,” a catchment approach to invasive species eradication. The Snowdonia National Park Authority leads on the development and delivery of several exemplar landscape-scale partnership projects and plans, including the Snowdonia Rhododendron Strategy, the Snowdonia Partnership Plan and



the £1.92 Million bid to the Heritage Lottery Fund for the Carneddau Landscape Partnership.

33. Most of Wales' landscapes possess fragments, rather than entireties, of functioning ecosystems. To put this another way, the most valued parts for biodiversity are the fragments and these are, by definition, unlikely to be fully functioning ecosystems. This re-emphasises the point that Wales' ecosystems are already not resilient so the first task remains to put things right. Human settlements and land use are likely to have annexed the most biologically productive areas a long time ago, i.e., ecological impoverishment is historic, deep and ingrained. The NR Policy, therefore, needs to address the challenge of reinstating ecologically functional landscapes, relying on more than just corridors and stepping stones. The latter are valid for the more mobile and ubiquitous species but are less valid for species with naturally low rates of dispersal, reproduction and population size. The appropriate approach for a wider range of species includes extensive landscape management incorporating extensive, low input agriculture.
34. Where the landscape scale approach is deployed, it will still require a sufficiently large and skilled workforce; a green growth opportunity for Wales.
35. Active Travel is unlikely to help reduce pollution, or help pollinators, in rural Wales. This is because the Active Travel areas are defined tightly by the boundaries of settlements larger than 2,000 residents; most of Wales' settlements are smaller than this.
36. The Nature Recovery Plan for Wales will be implemented in the main by unitary authorities and NRW, all of which are under increasing spending constraint, and by NGOs, which have previously benefited from grant-relationships with the cash-strapped public sector. Declining financial resources, bearing down on the workforce, will have a direct bearing on the speed of plan implementation through Local Nature Partnerships, and achieving the Aichi Targets. A priority, therefore, of the NR Policy is to secure more staff resources for biodiversity conservation; to grow the work force (green growth). Again, a closer working relationship between Health and Well-Being, Sport and Sustainable Natural Resources Management would prove beneficial to Wales.
37. This phrase needs to be defined. It will mean more than materials longevity and reuse suggested here. Is the intention that all sectors will achieve net sustainability, rural resilience and nature recovery?
38. The examples given in the consultation are happening already. The NNRP needs to explain how it will make a difference to what's happening already.
39. Using nature-based solutions to improve people's health and well-being can also help to build the constituency of support for Wales' healthy natural environment. This in turn can lead to more people choosing to work

K. Nature Recovery Plan for Wales and embedding these into Area Statements

L. A more circular economy

M. Delivering nature-based solutions



within this green growth sector. Perhaps, therefore, the NR Policy could develop a ladder of participation through health improvements, to life-changing experiences, to growing the workforce, to the level of national participation required to secure Wales' thriving biodiversity and resilient ecosystems.



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Brecon Beacons, Pembrokeshire Coast, and Snowdonia National Parks. Working in Partnership.

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Table 1: the close link between the principles of sustainable natural resource management and the management principles governing Wales' National Parks and Areas of Outstanding Natural Beauty.	
Principles of sustainable management of natural resources	Management principles of Category V protected landscapes, including National Parks (Phillips, Adrian, (2002). Management Guidelines for IUCN Category V Protected Areas: Protected Landscapes/Seascapes. IUCN Gland, Switzerland and Cambridge, UK. xv + 122pp.)
a. Being adaptable	<p>1. Conserving landscape, biodiversity and cultural values are at the heart of the Category V protected area approach. <i>This means managing change so that environmental and cultural values endure.</i></p> <p>10. Management should be business-like and of the highest professional standard. <i>This means achieving financial sustainability, marketing of conservation approaches, maximising efficiency and being open and transparent.</i></p> <p>11. Management should be flexible and adaptive. <i>This means adjusting to social, cultural and economic circumstances through time in order to remain relevant.</i></p>
b. Applying scale	2. The focus of management should be the point of interaction between people and nature. <i>This means that management primarily addresses the linkage between people and nature.</i>
c. Working together	<p>3. People should be seen as stewards of the landscape. <i>This means that people living and working in National Parks should be supported in their role as land managers.</i></p> <p>5. Management should be based on co-operative approaches, such as co-management and multi-stakeholder equity. <i>This means providing open and transparent processes for involving local people both in decision-making and implementation of work in their National Park.</i></p>
d. Engage with the public	4. Management must be undertaken with and through local people, and mainly for and by them. <i>This means that the full involvement of local people is essential, with local communities active in delivering protected area objectives, from which they benefit. The wider community of interest should benefit too.</i>
e. Using evidence	11. Management should be flexible and adaptive. <i>This means adjusting to social, cultural and economic circumstances through time in order to remain relevant.</i>
f. Understanding all the benefits	12. The success of management should be measured in environmental and social terms. <i>This means that setting objectives, allocating resources and monitoring outcomes should maximise environmental, social and economic benefits, which are a natural and equitable consequence of natural resource management.</i>
g. Considering short, medium and long term	6. Effective management requires a supportive political and economic environment. <i>This means achieving the objectives in the WFG Act.</i>



BRECON BEACONS  
NATIONAL PARK



Pembrokeshire Coast  
National Park



SNOWDONIA  
NATIONAL PARK

Table 1: the close link between the principles of sustainable natural resource management and the management principles governing Wales' National Parks and Areas of Outstanding Natural Beauty.	
Principles of sustainable management of natural resources	Management principles of Category V protected landscapes, including National Parks (Phillips, Adrian, (2002). Management Guidelines for IUCN Category V Protected Areas: Protected Landscapes/Seascapes. IUCN Gland, Switzerland and Cambridge, UK. xv + 122pp.)
	9. Economic activities that do not need to take place within the protected landscape should be located outside it. <i>This requires economic activities to be environmentally sustainable, to contribute to the aims of the area and for there to be strong reasons to be located in the area.</i>
h. Take account of the resilience of ecosystems, in particular the following aspects:	7. Management of Category V protected areas should not only be concerned with protection but also enhancement. <i>This means that, in response to the strong historic human influences, active land management is appropriate.</i>
i. Diversity between and within ecosystems	8. Where there is an irreconcilable conflict between the objectives of management, priority should be given to retaining the special qualities of the area. <i>This means sustainable natural resource management to achieve resilient ecosystems is most important.</i>
ii. The connections between and within ecosystems	
iii. The scale of ecosystems	
iv. The condition of ecosystems	
v. The adaptability of ecosystems	





Parciau Cenedlaethol Bannau Brycheiniog, Arfordir Penfro ac Eryri yn gweithio mewn partneriaeth  
Brecon Beacons, Pembrokeshire Coast, and Snowdonia National Parks. Working in Partnership.

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## **Response: Welsh Government consultation on Natural Resources Policy Development**

### **Date: February 2017**

There are four key points framing WEL's input into the development of the Natural Resources (NR) Policy.

- The need for clarity as to the legal purpose of the NR Policy, in particular the definition of sustainable management of natural resources.
- The importance of drawing on the evidence provided by the SoNaRR in order to identify priorities.
- The need for it to clearly direct the step change that needs to happen, across the whole spectrum of Government functions, if sustainable management of natural resources (SMNR) is to be achieved.
- The opportunities and threats to SMNR arising from the UK's exit from the European Union.

We provide more detail on each of these points below, then in this context we go on to provide our feedback on the Priority Themes and Key Challenges identified in the consultation document.

### **Clarity of Purpose**

1. The Environment (Wales) Act 2016 requires Welsh Ministers to prepare, publish and implement a national Natural Resources Policy – a document setting out their general and specific policies for contributing to achieving SMNR in relation to Wales, including what they consider should be done in relation to climate change and biodiversity.
2. SMNR means (according to the Act), using natural resources in a way and at a rate, taking other action to promote, and not taking action where it would hinder the achievement of the following objective: to maintain and enhance the resilience of ecosystems and the benefits they provide, and in so doing a) meet the needs of present generations of people without compromising the ability of future generations to meet their needs, and b) contribute to the achievement of the well-being goals. In delivering their duty to prepare, publish and implement NR Policy, Welsh Ministers are required to apply SMNR principles.
3. We wish to see this purpose clearly stated at the top of the NR Policy. The key message, for WEL – which shapes our later comments relating to the Key Challenges and Priority Themes – is that *it is through contributing to the maintenance and enhancement of the resilience of ecosystems that SMNR delivers wider benefits (i.e. contributes to the full suite of well-being goals)*. This objective must be clear in all of the priority themes, which we do not feel is currently the case. The key challenges of climate change and biodiversity decline, recognised in legislation, must be clearly addressed.
4. Given that there are numerous policies and plans that will be published as a result of the Environment Act, it should be set out how the NR Policy will fit with and influence Area Statements and the Nature Recovery Action Plan. It also needs to set out how it aligns with the Wales National Marine Plan and

other planning mechanisms, such as the National Infrastructure Commission for Wales, the National Development Framework, the Wales Marine & Fisheries Strategic Action Plan and Technical Advice Notes.

### The need to use SoNaRR to identify priorities

5. In creating the NR Policy, Welsh Ministers must have regard to the contents of the most recent SoNaRR report. The contents of the consultation document do not appear draw on the SoNaRR report – it is essential however that the published NR Policy does. The following points are not exhaustive, however, we would suggest at a minimum the NR Policy highlights the following points from SoNaRR.
6. SoNaRR<sup>1</sup> conducted a highly useful habitat-by-habitat analysis of attributes that support ecosystem resilience; it found that *“all habitats have problems with resilience, with condition being the most frequently poor attribute.”* This would therefore have an *“impact on their capacity to provide services and benefits into the future.”* The analysis of ecosystem resilience within SoNaRR should be the starting point for developing policy on natural resources, yet it does not feature much in the document. The ambition for Welsh Ministers should be to recover and restore natural resources, to harness multiple benefits and to protect intrinsic value.
7. SoNaRR also makes direct suggestions for where efforts could be focused, such as through Area Statements: *“For example, there may be a case for concentrating habitat restoration and creation in lowland and floodplain situations where historically greatest losses have occurred, whilst concentrating improvement of condition in upland, coastal and marine where large habitat extent remains but which is nonetheless vulnerable. Likewise, there could be an emphasis on maintaining and raising awareness of the value of habitats such as lowland semi-natural grasslands, which have been severely reduced in extent.”*
8. In table 4.1 of SoNaRR's Chapter 4<sup>2</sup>, the ecosystems identified as having the poorest resilience were: lowland healthland, lowland grasslands, arable farmland, flood plains and peatlands. Coastal margins and marine in general also faces issue with their condition. These could be identified in the NR Policy as top priorities for restoration.
9. In addition, SoNaRR makes recommendations in Chapter 8<sup>3</sup> on how to enhance and maintain resilience. These include the following, some of which we have expanded upon with additional evidence:
  - **Increase green infrastructure in urban areas** – this is set out well in the Wildlife Trust Wales report 'Green Infrastructure: A Catalyst for the Wellbeing of Future Generations in Wales'.<sup>4</sup>
  - **Increased woodland cover and existing woodland put under appropriate management** – new woodland must be appropriately located and well designed to deliver multi-purpose

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<sup>1</sup> Natural Resources Wales, 2016. *State of Natural Resources Report (SoNaRR)*. <https://naturalresources.wales/our-evidence-and-reports/the-state-of-natural-resources-report-assessment-of-the-sustainable-management-of-natural-resources/?lang=en>

<sup>2</sup> Natural Resources Wales, 2016. *State of Natural Resources Report (SoNaRR)*. Chapter 4: Resilient Ecosystems. <https://naturalresources.wales/media/679405/chapter-4-resilience-final-for-publication.pdf>

<sup>3</sup> Natural Resources Wales, 2016. *State of Natural Resources Report (SoNaRR)*. Chapter 8: Assessment of the Sustainable Management of Natural Resources <https://naturalresources.wales/media/679409/chapter-8-summing-it-up-final-for-publication.pdf>

<sup>4</sup> Wildlife Trusts Wales, 2016. 'Green Infrastructure: A Catalyst for the Wellbeing of Future Generations in Wales' - [http://www.wtwales.org/sites/default/files/green\\_infrastructure.pdf](http://www.wtwales.org/sites/default/files/green_infrastructure.pdf)



woodland, targeted at delivering a range of benefits in line with the goals of the Well-being of Future Generations (Wales) Act, including high biodiversity value.

- **Coastal zone management**
- **Working with whole catchments to enhance and restore flood plains**
- **Better soil management for carbon storage and water quality**
- **Adapting to climate change** – this needs to go hand-in-hand with the Welsh Government's approach to carbon budgeting and carbon emission targets.
- **Energy efficiency measures** – whilst Nest and Arbed set an excellent example of the benefits of energy efficiency, both in terms of carbon emissions and fuel poverty, these efforts need to continue at a pace.
- **Dealing with waste and recycling** – aiming towards a circular economy is vital. The 5p carrier bag charge was a step in the right direction, but we need to accelerate our efforts in this area to reduce waste, such as deposit return schemes and a potential Styrofoam ban. We also welcome the UK Government's consultation on banning microbeads, as interventions like this will help water quality across the breadth of the UK.
- **Tackling marine issues** – by integrated management of marine ecosystems through a planned system that facilitates better understanding of the benefits of marine natural resources and optimises their use – please see below for further comments on the role that marine planning and wider marine management can play in securing SMNR.

10. These headlines from SoNaRR form a useful starting point from which to identify priority actions. NRW has made it clear that these recommendations also encompass taking action for and maintaining and enhancing the status of biodiversity as an underpinning component of ecosystem resilience.

11. Biodiversity and species protection is not sufficiently addressed in the consultation document. We expect the NR Policy to include a comprehensive treatment of what Welsh Government considers should be done in relation to biodiversity. This should include commitments under the section 6 duty to maintain and enhance biodiversity, in particular species listed in section 7 of the Environment Act. We would also expect better management of protected areas and specific ambition to enhance site feature condition to be included in the NR Policy. This would enable Welsh Government to fully comply with their international biodiversity obligations, as well as the section 6 duty. Thirdly, we expect the NR Policy to embed all three parts of the Nature Recovery Plan for Wales; ensuring the strategy, its developing governance framework and live Action Plan are all given due priority and power to direct work to maintain and enhance biodiversity, and therefore the resilience of ecosystems across Wales.

### **The need to facilitate change**

12. The Cabinet Secretary's foreword to the consultation document states "*the evidence in relation to the challenges our natural resources faces is also clear and underlines that a step change is needed in order to address the unsustainable trends within the State of Natural Resources Report*". We welcome this statement. Making this step change happen is a substantial challenge, but the Priority Themes currently identified in the consultation document in no way point to how it will be achieved.

13. The Environment Act requires that Welsh Ministers must take all reasonable steps to implement the NR Policy and encourage others to take such steps. NRW must prepare Area Statements in order to implement it and the legislation is clear that other major policies – including the National Development Framework – must be influenced by it. The NR Policy also needs to have an impact on marine management and future land use policy. There must be some clarity about what needs to be done and the scale and pace of action required. This in turn will require the setting of, and reporting against,

targets or milestones to ensure progress towards achieving SMNR can be measured, or a lack of progress recognised and addressed.

14. Another way to facilitate change is to ensure the data is as up to date and thorough as possible. SoNaRR points to problems around paucity of data, which is a particular problem in the marine environment and for features of terrestrial protected sites such as SSSIs, for example. The NR Policy needs to address data deficiency so that Welsh Ministers continue to ensure resources are directed towards field work and analysis. As a result, the next SoNaRR report will benefit from richer data and more evidence on which to base the next Welsh Government's NR Policy.
15. It must be made clear in the NR Policy how the Nature Recovery Action Plan – a live and iterative document – will have the power and resources to achieve all six of its objectives. Most notably, safeguarding species and habitats of principle importance and improving their management; increasing resilience of our natural environment; tackling pressures on species and habitats; and improving our evidence, understanding and knowledge. This is of crucial importance for achieving international and domestic obligations with regard to biodiversity and for achieving the sustainable management of natural resources. The NR Policy must be explicit that the Nature Recovery Action Plan is part of the SMNR framework so that its implementation is addressed by Area Statements.
16. The language also suffers from being vague and not specific towards any targets. Words like 'increased', 'more' or 'improved' do not mean much without a benchmark or an aim to set them against. Although this is a high-level policy, the language could certainly be more specific and thus avoid the pitfalls of misinterpretation. The NR Policy should also make reference to where targets will be set (or reviewed in the light of SMNR), if they are not to be set in the NR Policy itself. It will not direct change if people cannot interpret it accurately.

### **The threats and opportunities arising from Brexit**

17. The Cabinet Secretary identifies the profound implications of Brexit and states the aim to ensure this consultation is a part of the Welsh Government's engagement on shaping the way forward for Wales. We want the NR Policy to clearly set the framework for developing future land and sea management policies, as well as making clear that the environmental protections that are currently secured through EU legislation will be maintained and strengthened. The Environment Act and the Well-being of Future Generations Act both enshrine in legislation the commitment to key international obligations that will not change as a result of the UK's exit from the EU – the NR Policy provides a key opportunity to underline the Welsh Government's commitment to delivering on these obligations, and to retaining EU-derived environmental protections. These cannot be underlined enough during the transition period of the UK leaving the EU.

### **Greater attention to the marine environment is needed**

18. However, we also need to recognise the pitfalls arising from Brexit and not just the opportunities. The implications for marine are stark and the current NR Policy does not pay sufficient regard to the marine environment. It is hard to envisage how the theme of 'nature-based solutions' to recover and enhance natural resources could be applicable at sea. There are some restoration projects taking place in Wales, such as native oyster restoration, but the overall scope for habitat restoration and creation in the marine environment is limited. With this in mind, the NR policy needs to give more consideration to how we use marine natural resources in a way and at a rate that is sustainable. One of the biggest opportunities, but also challenges, not picked up within the NR Policy is the Blue Growth potential of Wales's sea area.

19. The Welsh Government must fully commit to ensuring the Marine Plan supports the sustainable use and management of marine natural resources. This should include recognising the need to carefully assess potential developments; to protect areas from some or all types of development; and to enable ecosystems to thrive and recover. Otherwise we will end with diminished resources and an ecosystem that is unable to adapt to future change.
20. Welsh sea fisheries and shell fisheries are also a key natural resource for Wales, yet these aren't recognised as such within the NR Policy. Whilst the Marine Plan will promote sustainable use of Wales' marine natural resources, it is wider fisheries management implementation that will ensure such resources will be sustainably managed. Therefore the NR Policy must address this.

### **General feedback on the three Priority Themes**

21. The Priority Themes do not provide any clear guidance on how to achieve SMNR or how it will contribute to building a new policy for farming and fisheries management after the Common Agricultural Policy and Common Fisheries Policy come to an end. This needs to be threaded throughout the document or provided for in an additional section.
22. Ensuring that the NR Policy includes an introductory section that clearly sets out its purpose, as we have outlined above, will go a long way towards addressing this. However, we feel that the wording of the Priority Themes should also be amended, in order to make it clear how they will contribute to SMNR. The consultation document states that the themes are to 'inform sustainable management of natural resources across Welsh Government'; at present we see little to indicate how Welsh Government departments should change the way they operate in order to deliver SMNR.
23. The phrase 'accelerating green growth' should be replaced by a reference to securing sustainable development, which ensures natural resources are used appropriately in supporting economic opportunities, without compromising the objective to maintain and enhance the resilience of ecosystems and the benefits they provide.
24. We welcome the section under the Priority Theme 'improving community and individual well-being by taking a place and landscape based approach'. This recognises the approach set out in the Lawton Review, whereby protected sites should become cores of large-scale functional networks. The wording of this theme is somewhat confusing and we would welcome it being turned around, e.g. 'Taking a place and landscape based approach to restoring nature, thereby tackling biodiversity decline while improving community and individual well-being'.
25. Notwithstanding our comment above, we would like to see a stronger recognition in the NR Policy of the critical role protected sites have to play in maintaining and enhancing the resilience of ecosystems and the benefits they provide. The Policy must highlight the need to continue protecting Sites of Special Scientific Interest (SSSIs), Ramsar sites (designed under the Convention of Wetlands of International Importance) and Natura 2000 conservation sites, which are part of the EU-wide network of Special Protection Areas and Special Areas of Conservation, and to secure appropriate management to achieve favourable condition. The important role of Areas of Outstanding Natural Beauty and National Parks in securing such an approach should also be recognised.
26. Natura 2000 needs to be assured in particular, given the UK's exit from the EU. In good condition, Natura sites benefit well-being by providing essential support services for all of us through carbon storage, cleaner water, natural sea defences, green jobs and local enterprise. They contribute significantly to the Welsh economy through tourism, recreation, farming, fishing, and forestry. This is

documented in an EU Commission report on Natura's economic benefits<sup>5</sup> and an NRW report which looks at Wales specifically<sup>6</sup>. In the most recent analysis, it is shown that Natura 2000 offers important additional value for common biodiversity and the study "*emphasises the importance of policy and financial instruments and the associated management measures which continue to maintain or to restore habitats in Natura 2000 sites in a condition that is favourable*".<sup>7</sup> Further evidence also demonstrates the contribution of Natura 2000 sites and the EC Nature Directives as a whole to achieving the international CBD Aichi targets and other multilateral agreements<sup>8</sup>. The benefits of SSSIs have also been well documented.<sup>9</sup>

### General feedback on the key challenges

27. The NR Policy needs to be clearly based around priorities, risks and opportunities for SMNR, including what should be done in relation to climate change and biodiversity, as required by section 9(2) of the Environment (Wales) Act 2016.
28. The consultation document is not structured in this way. It starts with some key challenges that were raised in the interim Natural Resources Policy Statement and does not link to SoNaRR very clearly. The document seems to largely be about *opportunities*, with limited linkage to the risks and priorities, and trying to integrate cross-cutting Welsh Government priorities rather than focusing on the needs of Wales' ecosystems.
29. In particular, the key challenges do not seem to address:
  - a. The urgent need to tackle climate change, particularly in the context of the first carbon budgets being set in 2018.
  - b. The urgent need to address the ongoing decline in many species and habitats<sup>10</sup> at a speed and scale appropriate to the size of the problem.
  - c. How to achieve the sustainable management of the marine environment. SoNaRR identifies challenges to the marine environment as lack of data and pressure from 'Blue Growth'. These need to be clearly identified within the NR Policy with clear action assigned to address these.
30. The risk register set out in SoNaRR<sup>11</sup> provides clearly defined and significant risks to each habitat, according to six of the wellbeing goals from the Wellbeing of Future Generations Act. These should directly inform the NR Policy's key challenges and their risks, priorities and opportunities.

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<sup>5</sup> EU Commission, 2013. The Economic Benefits of the Natura 2000 Network -

[http://ec.europa.eu/environment/nature/natura2000/financing/docs/ENV-12-018\\_LR\\_Final1.pdf](http://ec.europa.eu/environment/nature/natura2000/financing/docs/ENV-12-018_LR_Final1.pdf)

<sup>6</sup> Natural Resources Wales, 2015. Life Natura 2000 Programme for Wales: Summary Report -

[http://naturalresources.wales/media/674546/nrw28788-life-natura-2000-report-december-2016-update\\_english\\_spreads.pdf](http://naturalresources.wales/media/674546/nrw28788-life-natura-2000-report-december-2016-update_english_spreads.pdf)

<sup>7</sup> European Union, 2016. Nature & Biodiversity Newsletter, No. 40 -

[http://ec.europa.eu/environment/nature/info/pubs/docs/nat2000news/nat40\\_en.pdf](http://ec.europa.eu/environment/nature/info/pubs/docs/nat2000news/nat40_en.pdf)

<sup>8</sup> Beresford et al, 2016. The Contributions of the EU Nature Directives to the CBD and Other Multilateral Environmental Agreements - <http://onlinelibrary.wiley.com/doi/10.1111/conl.12259/abstract>

<sup>9</sup> GHK Consulting, 2011. Benefits of Sites of Special Scientific Interest. Final report for DEFRA -

<http://randd.defra.gov.uk/Document.aspx?Document=finalreportsssis-benefits.pdf>

<sup>10</sup> Hayhow, D.B. et al, 2016. State of Nature 2016. The State of Nature Partnership -

[https://www.rspb.org.uk/Images/State%20of%20Nature%20UK%20report\\_%2020%20Sept\\_tcm9-424984.pdf](https://www.rspb.org.uk/Images/State%20of%20Nature%20UK%20report_%2020%20Sept_tcm9-424984.pdf)

<sup>11</sup> Natural Resources Wales, 2016. *State of Natural Resources Report (SoNaRR)*. Chapter 7: Towards sustainable management of natural resources. <https://naturalresources.wales/media/679412/chapter-7-towards-smnr-final-for-publication.pdf>

**Wales Environment Link (WEL)** is a network of environmental, countryside and heritage Non-Governmental Organisations in Wales, most of whom have an all-Wales remit. WEL is officially designated the intermediary body between the government and the environmental NGO sector in Wales. Our vision is a healthy, sustainably managed environment and countryside with safeguarded heritage in which the people of Wales and future generations can prosper.

This paper represents the consensus view of a group of WEL members working in this specialist area. Members may also produce information individually in order to raise more detailed issues that are important to their particular organisation.



## Consultation Response Form

Your name: Rhian Connick

Organisation (if applicable):

National Federation of Women's Institutes-Wales

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**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**

**Access to green spaces** - Access to attractive, good quality green spaces has a key part to play in improving the health and the quality of life of the nation. Accessible green spaces need to be protected and enhanced to support people's physical and mental wellbeing and help tackle address issues such as obesity by getting people to spend more time outdoors and being active. They should be accessible in all communities.

**Government action** - We welcome the Environment Act in setting a legal target to reduce greenhouse gas emissions by a minimum of 80% by 2050 and the duty to set interim emission targets and carbon budgets. Both the Environment Act the Well-being of Future Generations Act need to be backed by strong actions if their commitments are to be realised. The NFWI-Wales believes that the Natural Resources Policy should include actions that the Welsh Government will take to tackle climate change including specific actions to meet its current target of cutting greenhouse gas emission by 40% cuts by 2020. The sustainable management of natural resources should be a cross-cutting theme across all government departments and should not be unique to the Department for Environment and Countryside.



**Women in decision-making** – NFWI-Wales would like to highlight the importance of ensuring that women's voices are well represented in decision-making processes in relation to the sustainable management of natural resources. Women continued to be under-represented in public life. To ensure that policies and decisions reflect the needs of women, it is vital that they are represented at all levels of decision-making. Women can be powerful agents of change however The *WI at 100* Report found that only 32% of WI members feel that they have a good deal or some influence over decision-making in their local area.

Climate change is an area in which women are uniquely placed to make a difference; as consumers, educators and change agents in their homes and communities, encouraging the adoption of lower carbon lifestyles and passing on green values to the next generation. Women have a unique role in tackling and adapting to climate change as guardians of natural resources, primary decision-makers in household consumption, educators of the next generation and key voices within communities. Only when women are equally represented in decision-making, can their potential to create a fairer, more sustainable world be fully realised.

**Community engagement** - Community and individual engagement is crucial in addressing the challenge of reducing the pressures on our natural resources and in protecting and enhancing our natural environment. Firstly to connect people with the outdoors and also encourage behaviours so that people value and respect the environment.

One of the challenges in safeguarding our natural resources is in enabling behavioural change. Natural resources must be made relevant to individuals to change attitudes and behaviours. For example, it is essential that climate change is made 'relevant' to all citizens and that they are given the information and support to make necessary changes to their lifestyles.

The NFWI believes that empowering consumers to make informed decisions is key to driving behaviour change. The NFWI has significant experience of facilitating behaviour change and awareness raising within communities. Much of the NFWI's work on climate change and waste has focused on enabling and inspiring members to take personal action to reduce their environmental footprint, and to spread the word to others. For example, the NFWI-Wales Gardening with Schools project involved over 100 primary schools and WIs working in partnership to establish vegetable and wildlife gardens. The project aimed to connect young people with food and the environment whilst spending time outdoors and taking part in physical activity.

The NFWI's Eco Teams initiative provided the opportunity for WI members to tackle the challenges of reducing their consumption and increasing recycling by sharing learning amongst peers in community groups. An evaluation of the project in Wales, involving a total of 81 people, found that EcoTeams had achieved, on average, a 22% reduction in water consumption. If participants maintained this new behaviour, it would equate to a saving of 19,902 litres of water per household per year. If every household in Wales followed this behaviour, 12, 412 Olympic size swimming pools would be filled. Other results included the following:- overall, households reduced their waste by an average of 16.1%; reduced their recycling by an average of 6.8%; reduced their electricity consumption by an average of 12.4%; and reduced their recycling by an average of 6.8%.

**Safeguarding food security** - Another challenge is food security and the sustainability of our food supply. The competing pressures and demands on the global food system are a major challenge for policy makers worldwide. There is no simple solution to addressing the tremendous demands on the food system and a holistic approach, involving all sections of society is needed.

We need to deliver sustainable food production to meet the growing population and the increasing demands on land, energy and water. The agricultural industry makes a significant contribution to the Welsh economy and will have a key part to play in meeting the demands on the global food system. The challenge facing the industry is in increasing food production whilst reducing the impact on the environment. Farmers are guardians of the countryside and should be provided with guidance and support in enhancing the environment and in mitigating and adapting to climate change.

There needs to be a greater knowledge of the food chain and appreciation of food and a move away from the reliance of pre-packaged food. There is a need to ensure that account is taken of the fact that not all the population of Wales has access to safe, high quality, affordable food. We must make sure that there is access to locally grown, seasonal food and make the origin of the food clear. There is also a need to outline the benefits of food that is local and seasonal.

Food waste is another issue that needs be addressed. Food waste is all around us; according to the Waste and Resources Action Programme (WRAP), 1.7 million tonnes is wasted at manufacturing level, 0.2 million tonnes by supermarkets and 7 million tonnes in the home. Whilst concerted efforts in recent years have made a significant dent in these figures, the facts are still stark. This is happening at a time when an estimated 8.4 million people in the UK do not have enough to eat, with 4.7 million unable to afford a basic meal a day. There are over 400 food banks in operation across the UK and WRAP estimates that only around 18% of edible surplus food is being redistributed for human consumption.

As a nation the UK wastes more food than anywhere else in Europe, costing the average household £470 per year. Farm land roughly the size of Wales is being used to produce all the food that then goes on to be wasted in our homes, generating the equivalent carbon emissions to one in four cars on our roads. And globally, if we managed to redistribute just a quarter of the food currently wasted, there would be enough food to feed the 870 million people living in hunger. Yet, despite encompassing social, economic and environmental issues, decisive action to tackle food waste has been slow.

**Protecting pollinators** – Linked to food security, action to protect bees and other pollinators should be a central part of the Natural Resources Policy. Pollinators play a key role in our countryside and landscape. A stakeholder approach is needed to address the multi-faceted challenges facing our bee populations and the range of factors affecting their decline.

We believe that bees and other pollinators offer a good means to communicate some of the broader challenges facing our natural environment. In protecting our bees, we have the opportunity to deliver a transformation in the way that our communities respond and react to their local environment, and in doing so, make them much more vibrant places. The NFWI's SOS for Honey Bees campaign received a huge amount of support from WI members. A number of WIs and federations have been working with their local authorities to develop bee-friendly public spaces. Federations are also currently involved in organising bee days to raise



awareness amongst the membership and to engage members in individual and community action to support pollinators.

- **the barriers that need to be addressed.**

**Public transport** - One of the barriers that we feel needs to be addressed is people's reliance on car use. Difficulties in accessing public transport, particularly in rural areas, is a recurring theme raised by our members. A third of WI members (34%) want the government to make it easier for people to use public transport as a means of tackling climate change. In *The WI at 100* Report, one area that WI members identified as being difficult to be more environmentally friendly is transport. While 63% of WI members use public transport to varying degrees, 46% of members say that their use of these services could improve as part of efforts to reduce environmental impact at household level.

**Engagement** – Another barrier that we foresee in achieving the aspirations of the Natural Resources Policy is lack of connection by individuals and community groups in engaging with and protecting the natural environment. Roadside litter, for example, demonstrates a lack of respect and care for the environment. As we outline above, engagement is vital in helping protect our natural resources.

Scepticism about climate change is a barrier that will need to be addressed. Communications on climate change should be linked to people's values, what they care about and focus on the local impacts which people can relate to e.g. flooding and the benefits of a low carbon economy e.g. clean energy. People are often influenced by people they know and trust therefore successful engagement with community groups can be key in targeting and getting people to take action to mitigate climate change.

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

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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## Consultation Response Form

Your name: Liz Franks – Environment & Policy Manager  
Organisation: Dee Valley Water  
Email / telephone number: [liz.franks@deevalleygroup.com](mailto:liz.franks@deevalleygroup.com)  
Your address: Packsaddle, Wrexham Road, Rhostyllen, Wrexham LI14 4EH

**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.

We support the Welsh Government's intention to publish a Natural Resource Policy, recognising the importance of Wales' natural resources to our business as a water company. The UK water industry is facing challenge to increase their resilience to the impacts of climate change and population growth, looking for innovative solutions to bolster their water resources and improve demand management. We feel that the Welsh Government's approach to sustainable management of natural resources offers the Welsh water companies an opportunity to collaborate with a range of stakeholders that may not have been previously possible.

With regards to the key steps that need to be taken to deliver the priority themes, we have the following general comments to make:

- Collaborative working will be key to delivering all of the themes. There are already some great examples, such as the River Basin District Liaison Panels, but Welsh Government will need to consider how this approach can be developed and facilitated as well as what type of incentives they will offer to encourage collaboration. For example, we feel that a review of the CAP and Glastir programmes would be timely, to improve the incentives for a wider range of landowners to engage in catchment management.
- This approach also offers great opportunities for sharing of best practice between organisations with a natural resources management remit. For example, water company catchment management work to meet NEP drivers.
- In addition to the working partnerships which will need to be developed, we feel that it would be helpful to have an academic network to link into. Most, if not all, of the large infrastructure sectors already fund a wide range of research so we

would suggest that the Welsh Government engage with the key industry bodies at an early stage to establish these links. For example, the UK water industry, including both Welsh water companies, belong to Water UK (a membership organisation which represents all major statutory water and wastewater service providers in England, Scotland, Wales and Northern Ireland) and UKWIR (set up by the UK water industry in 1993 to provide a framework for the procurement of a common research programme for UK water operators on ‘one voice’ issues).

- We agree wholeheartedly with the principles set out in Annex 1, particularly ‘working together’; however, the policy will need to set out clear, well-defined roles and responsibilities to ensure that each of the principles have owners, whether that be NRW, local authorities or the Welsh Government themselves. Without these ownership and facilitation roles, deliver of the policy will not happen.

Possible barriers to delivery of the policy:

- Clarity is needed in relation to timings for delivering against the policy and associated legislation. There is a current expectation that public authorities (including water and sewerage undertakers) will set out their action plan for meeting the biodiversity duty by May 2017 but the Area Statements, which will provide the detailed evidence for identifying actions, won’t be published until 2018-19.
- In the Cabinet Secretary’s recent written statement to update the Water Strategy action plan, she stated that “*We are improving the planning and management of our water services, in which the support and involvement of our delivery partners is integral and vital in its delivery.*” We fully support the improvements to planning of water services but feel that there is still a need to review how the various planning regimes fit together and the links to local development planning, to ensure that any mis-match in planning cycles do not become a barrier to collaboration or delivery of the SMNR approach.

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

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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By email

10/02/2017

**Response by the Future Generations Commissioner for Wales to  
Welsh Government Consultation to inform the development of the Natural Resources Policy (ref.  
WG29897)**

I welcome the opportunity to respond to the consultation to inform the development of Welsh Government's Natural Resources Policy. The consultation invites feedback on the priority themes and key objectives as outlined in the document, taking into account the legal framework and its requirements.

My response focuses particularly on the Well-being of Future Generations (Wales) Act 2015 as a core part of that legal framework, and on your proposed priority themes in light of the Act.

The Well-being of Future Generations (Wales) Act places statutory duties on public bodies in Wales, including the Welsh Government, to carry out sustainable development in the design and implementation of the Natural Resources Policy. The Policy should be designed to improve the economic, social, environmental and cultural well-being of Wales by using the sustainable development principle and the five ways of working to maximise its contribution to achieving the seven well-being goals:

- A prosperous Wales
- A resilient Wales
- A healthier Wales
- A more equal Wales
- A Wales of cohesive communities
- A Wales of vibrant culture and thriving Welsh language
- A globally responsible Wales

As Future Generations Commissioner for Wales my role is to ensure that the framework of the Act underpins the development of the new Natural Resources Policy.

The consultation document sets out three priority themes within the Natural Resources Policy:

- 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.

These seem to me to offer wide scope for Welsh Government to work towards the well-being of future generations, and I am pleased to note the explicit attention that has been paid to the Well-

being of Future Generations (Wales) Act in the consultation document. It would be useful for the document to clearly lay out what the Government's key objectives are within these priority themes, in order to be able to assess how well they are likely to deliver on its obligations to future generations under the Act.

What matters for future generations is how the broad aspirations set out in the consultation document are now translated into specific strategies and actions on the ground.

Doing this must involve identifying what **long term** and **preventative** measures should be prioritised to address the most critical and over-riding environmental challenges such as climate change, loss of fertile soils, decline of biodiversity and lack of ecosystem resilience, as highlighted in for instance your State of Natural Resources Report. It will also involve addressing institutional barriers such as planning, which can sometimes stand in the way of adopting the future-friendly strategies suggested in the document.

Translating the priority themes into practical action must demonstrate an **integrated** approach which will ensure that the Policy works holistically to build the social, cultural and economic wellbeing of current and future communities in Wales, whilst responding urgently and robustly to those environmental concerns. That integration must also take into account other relevant Welsh Government policies and Welsh Government's own well-being objectives, all of which are relevant to the Natural Resources Policy but I would highlight particularly the direct links with objective 6 'support the transition to a low carbon and climate resilient society' and objective 12 'manage, use and enhance Wales' natural resources to support long-term wellbeing'.

Taking proper account of the well-being of future generations will also involve working out how **collaboration** between the many public, private, voluntary and community bodies who engage with Wales' natural resources, and **involvement** of all citizens and stakeholders who benefit from them, will be built into the Policy itself. This includes not just taking on board the feedback received through the current consultation, but establishing effective mechanisms for collaboration and involvement throughout the life of the Policy.

We are developing our own priority areas for action and have identified some similar long-term concerns for the well-being of future generations, so it will be important to work together in addressing these and I would be happy for my office to discuss this further with officials if this would be useful.

Yours faithfully,



Future Generations  
Commissioner  
for Wales  
Comisiynydd  
Cenedlaethau'r  
Dyfodol Cymru





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## Response: Welsh Government consultation on Natural Resources Policy (NRP) Development

**Date: February 2017**

WWF's response is supplementary and complementary to that of Wales Environment Link, which we support. This response provides further detail on particular areas of interest to WWF

### CONTEXT

1. WWF has been an advocate of sustainable development and the Ecosystem Approach for many years. We believe these fundamental changes to the way decisions are made and the way we live are key to our future. Therefore, we view the legislative governance approach enshrined by the Wellbeing of Future Generations Act (WFGA) and Environment Act, as crucially important exemplars for the world as to how a transition to a better way of doing things could be driven forward.
2. WWF views the Environment Act as essential to ensuring the effective delivery of the goals in the WFGA. The Sustainable Management of Natural Resources (SMNR) is a crucial new way for Government and other public bodies to operate. However, moving to this way of operating requires major systems and culture change. The Natural Resources Policy is a crucial part of delivering this transition.
3. It is also an opportunity for Government to demonstrate to other public bodies how they should be developing and linking their policies and action plans to the delivery of the WFGA. This could be done much more effectively within the policy by some explicit links.



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Llywydd: Ei Uchelder Brenhinol, Tywysog Cymru KG, KT, GCB, OM

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President: His Royal Highness, The Prince of Wales KG, KT, GCB, OM



4. It is within this context of supporting radical change that we make our comments on the consultation and suggests improvements to the Purpose, challenges and themes of the document as well as considering the key next steps and barriers.

## PURPOSE

5. The purpose of the Policy is clearly laid out in the Environment Act in regards to contributing to SMNR. A clear explanation of the objective of SMNR (and thus of this policy), as explained in Section 3(2) of the Act, should be at the front of the policy, including as it applies to the marine environment. To drive through understanding and change, the Policy **needs to be explicit about SMNR and how it's different from previous approaches. Clarifying the changes to decision making and the evidence required for it is one aspect of this.**
6. There should also be an explanation that the policy is seeking to make the transition to SMNR i.e. to using and managing natural resources in a way that will meet that objective and so continue to provide benefits for us as well as our children and grandchildren.
7. The Policy should also **be explicit that it is seeking to maximise contribution to the wellbeing goals in WFGA** i.e. to fulfil Welsh Government's obligations under WFGA. Currently the only explicit connection is made in the Ministerial foreword.
8. It is important that, *all* Government documents demonstrate best practice in the application of the WFGA. In particular, **how delivery of the Goals and the SD principle has shaped the policy** or plan in question. At the moment the consultation is framed around using natural resources to deliver the Programme for Government (PfG). However, Welsh government have accepted that the Programme for Government did not directly meet the requirements of the WFGA to lay out objectives and key steps to maximise their contribution to the goals. They have since published the Wellbeing objectives and stated that the four crosscutting strategies will encompass the next steps to deliver the goals. Clearly this policy will also be delivering on this, therefore **it is important that the relationship and impact of the policy on the strategies is clearly laid out.**
9. This may sound like too much information, but it is important to remember that delivery of the WFGA is going to require many years of culture change and continuing clarity and coherence will be important to drive these changes. Providing a good example of the rationale by which the NRP is designed to contribute to the goals is important to show leadership to the rest of Government and Public bodies. A clear reminder that the Environment Act was developed as a key mechanism to deliver on WFGA would be useful also. In that way, public bodies will see its relevance to them and their decision making processes and will illustrate how this approach will help them fulfil their obligations under WFGA.
10. From WWF's perspective, this policy is a *critical contribution* to maximising the delivery of the 'Resilient Wales' goal. Additionally, it is *critical* for the transition to,

and the understanding of, a ‘ Prosperous Wales’, with a low carbon, economy which uses resources proportionately and efficiently . Finally, this resource efficiency agenda is also vital for becoming a ‘globally responsible Wales’. The policy does of course, also make a contribution, although a lesser one, to the achievement of the other goals.

11. For WWF Cymru the combination of these goals requires explicit and central reference in a policy about sustainable use of natural resources. We believe there is a **significant gap in the NRP as it currently makes no reference to how Wales contributes to the sustainable use of resources globally.**
12. It is fairly straightforward to **make this contribution explicit within the document and thus exemplify for others how a consideration of delivering all the goals contributed to the development of the Policy.**
13. In terms of delivering on WFGA, its **indicators of progress in regard to sustainable development include ecological footprint, carbon footprint and material footprint. We would expect the NRP policy to be clear that SMNR aims to reduce these indicators.** Indeed, it would be much clearer and more effective as a policy if it specified the scale and pace of the change required in regard to these indicators. It is unfortunate that Government has not yet published milestones for the indicators as required by WFGA. Perhaps this policy could rectify this.
14. The Policy should also **link to the statutory Greenhouse gas emissions target within the Environment Act and make an explicit link to helping deliver on the carbon budgets for the milestones towards this target.**
15. **The three priority themes (or areas of work might be a clearer title) should specifically explain the rationale for their choice, their desired outcomes and their contribution to the goals.** This latter is not intended to suggest a tick box approach showing that they in some measure contribute to everything, even though this could be laid out in a table for clarity.
16. However, it should be possible to structure the Policy such that the key challenges also relate to the goals. It should also explain the objective of resilience of ecosystems is essential to provide benefits such as prosperous economy, a long term sustainable land use industry, clean air and water for people’s health , abundant biodiversity to attract visitors and ensure long term health of natural environment for our health etc.
17. It would also be useful to specifically link the Policy to key parts of the descriptors of the goals. For example, Prosperous Wales specifically aims for a ‘ low carbon society, which recognises the limits of the global environment and therefore uses resources efficiently and proportionately”. The Wellbeing objective has the rationale that “Wales natural resources are fundamental to the long term success of the economy as they are to the quality of our natural environment and the health and wellbeing of communities”. So **reiterating this language and explicitly referencing it is important to reinforce the reasons for change and the commitment to it.**

18. **This might be usefully included in the section on ‘risks’ which is required by the Act but is missing from the consultation.** For example , risks to health from air quality, loss of productivity from soil erosion, risk to future prosperity from over- use of Natural Resources and badly planned development to the point of ecosystem collapse.
19. This clarity is important as this Policy, insofar as it is delivering on the WFGA, must be used as one of WG’s channels to influence all public bodies. For example, it must also be influencing Local authorities and PSBs through the Planning Policy framework , National development framework etc.

## STRUCTURE

20. Once the objective of the Policy has been clarified, it should then be acknowledged as **a key driver of the policy that SoNaRR found that *none* of the key ecosystems in Wales were resilient. It would be useful then to reiterate the key causes of this problem as the framework for the challenges and key priority themes.**
21. **It should be made clear that over- exploitation of resources is a current cause and will be a key future challenge**, due to growing population, demand for water etc.
22. The key challenges to its achievement should be clearly laid out. These should be updated from the 2015 ones in the consultation to reflect the latest evidence in SoNaRR. However, there are some clear overarching challenges which should be included.
23. The key challenges for delivery of this objective which the policy must address are:
- Reducing greenhouse gas emissions by 80% by 2050
  - Restoring good ecological and environmental condition to our ecosystems
  - Transitioning fairly to a low carbon, resource efficient economy.
  - Adapting to the impacts of climate change e.g. flood prevention, water availability and habitat connectivity
  - Providing key ecosystem services in the long term i.e. water, productive soils,
24. The risks posed by this lack of resilience also need to be clearly laid out as required by the Act. See Para 18.
25. The Policy can then go on to lay out its priorities and opportunities as required by the Act.

## GENERAL POLICIES

26. The Environment Act requires this Policy to set out both general and specific policies for achieving SMNR. Judging from the priority themes , **it seems clear there will be a need for some general policies to guide decision making in addition to these Priorities.** The priority themes will fit quite well under the heading of the opportunities for SMNR and in many ways can encompass the requirement of the Act to ‘ consider what should be done in relation to climate change and biodiversity’.
27. However, it would be clearer still **if the structure made clear that priority themes were the areas of best opportunity for action in the medium term** ( constituting specific policies) but that they were **supplemented by clarity on the other policies which will be implemented to deliver the objective** and also **clarity on the other policies and plans which will be delivering the practical action for change.**
28. So for example, **general policies should include that all policies and plans will also be expected to contribute to reducing greenhouse gas emissions.**
29. For the marine environment, **there should be a general policy that all policies and plans will be expected to contribute to good environmental status under the Marine Strategy Framework Directive.**

#### SPECIFIC POLICIES OR priority themes

30. The Green Growth theme is welcome, particularly in regard to its support for a transition to a circular economy and is welcome as one mechanism for reducing resource use.
31. However, there is a general lack of clarity on the meaning of the phrase ‘ green growth’ . It is welcome that here it defines this as both socially equitable and sustainable use of resources.
32. However, **titling the theme ‘ accelerating green growth’ without any evidence that this can be achieved whilst restoring ecosystem resilience sets a bad example for other policies and strategies.** Clarity is needed because other policies, such as Wales Marine Plan include aims such as increasing aquaculture, which are unsupported by any evidence that the level of increase is consistent to SMNR. **Changing this approach to policy making should be a key aim of the NRP.**
33. In general, **responding to the challenge of reducing greenhouse gas emissions is not adequately dealt with across the three priority themes.** Whilst nature based solutions can contribute to this the key actions should also crucially include transitioning to low carbon agriculture and food production. Current land uses are a key contributor to our total emissions and the nature based solutions are tackling some of the more minor causes. **The NRP should be giving direction to the development of future land management policies,** particularly in the post- EU strategies.

34. Again the **landscape scale approach is to be welcomed**. However, this needs to be better related to the marine environment where the opportunities and challenges are different.
35. Wales has a real opportunity to deliver true wider ecosystem resilience at sea with the combined legal tools available to Welsh Government. It will therefore be critically important that the NRP and subsequent area statements are fully integrated with, and complement, the Wales National Marine Plan, in turn making an essential contribution to achieving Good Environmental Status under the Marine Strategy Framework Directive (MSFD). However, we see very little mention of marine planning and the need for ecosystem based management at sea beyond a single reference within the landscape and wellbeing priority theme, and no mention of the MSFD at all. There is also no mention of how area statements will relate to marine planning, and no mention of supporting coherence and management of MPA networks (even though most MPAs are in unfavourable condition).
36. As well as landscape-scale planning, marine plans will be also be essential in delivering green growth at sea in a sustainable way. They should identify suitable areas based on environmental sensitivities as well as technical resource opportunity, and encourage nature based solutions by removing key pressures upon the marine ecosystem. As such, **we recommend that the marine plan is considered as a cross-cutting tool for achieving all priority themes, with reference to the obligations of the MSFD in the marine environment**.
37. We also note in this regard that many of the examples of nature based solutions in the consultation are simply not applicable in the marine environment, which requires the reduction of cumulative impacts from damaging human activities, particularly outside of the coastal zone. One obvious example of nature-based solutions in the inshore area is the effective management of the Welsh MPA network which should be highlighted. We welcome, however, the implied support for increasing the extent and condition of coastal habitats that provide natural flood defence, carbon sequestration and other ecosystem service benefits) and the support for applying ICZM principles, though again we emphasise ICZM is more than just an environmental set of principles.
38. If the NRP is considered as the priority delivery mechanism for ecosystem resilience in the Welsh inshore area, then **references are needed on the importance of taking the precautionary approach to natural resources management** and the need to restore and enhance the ecosystems that provide such benefits in both the NRP and the marine plan. At the moment, we are not confident that the Wales National Marine Plan will achieve what the NNRP wants it to, given its focus on achieving “Blue Growth” and focus in its policies on sectoral development.

## IMPLEMENTATION

39. Clarifying that the Policy will be delivered through other key Policies and programmes, perhaps by linking the general policies and priority themes to the levers of implementation is highly desirable. **For example, being specific about the relationship between this Policy, the crosscutting strategies of Government, the Wales Marine Plan, Nature recovery Plan, National Development framework and Planning Policy Wales.** In that way, Government is being clear about who is expected to help take this policy forward. This is part of laying out the next steps.
40. It is particularly important to provide additional detail linking Green growth and reducing greenhouse gas emissions to the 'Prosperous and secure' cross cutting strategy and its implementing plans such as south Wales Metro, the National Development framework etc. Also linking restoring biodiversity and nature based solutions, to the post Brexit land and fisheries management regimes, the Nature recovery plan and marine plans.

## **KEY NEXT STEPS**

41. Clarifying the implementation mechanisms and ensuring they clearly lay out the key action and the scale and pace of change.
42. Clear targets and monitoring framework to determine progress towards the NRP goals and enable adaptive management.
43. An effective programme for achieving the culture change in decision making required by this Policy. A major priority must be within Government itself, improving policy coherence between the departments who have the biggest impact on achieving SMNR.

## **BARRIERS**

### **Governance**

44. We would argue that a key risk to the achievement of SMNR is a lack of focus on transformational governance policies. How does the NRP encourage communication and integration across departments? How will it help harmonise conflicting government priorities? How will it help ensure WG has the staff and capacity to deliver effective stakeholder engagement through the local area statement process?

### **Integration and policy coherence**

45. The Environment Act's adoption of SMNR showed a clear recognition that the sustainable use of resources can only be achieved by looking at ecosystems as a whole, including human needs within that. This holistic way of thinking is crucial to WFG Act delivery. A key weakness to being able to deliver sustainable development was identified through this process as the lack of importance and priority given to the state of the natural environment in decision making.. SMNR is a clear purpose and mechanism for ensuring effective inclusion of environmental impacts into decisions.

46. It also recognised that many of the key drivers of loss of natural resources were from human over- exploitation and lack of management. However, for effective action, decisions taken in economy, infrastructure, transport and health must be changed to work towards SMNR.
47. The priority themes show some recognition of this. However, there are still examples of lack of effective communication between Government departments and a lack of policy coherence for SMNR. The WFGA principle of integration is specifically intended to tackle this. So it is critical that the next steps include improving the understanding and commitment of the decision making structures within Welsh government and, very importantly in external partnerships which are helping deliver for Government. An example here would be City regions .
48. The department could support the development of tools to help other decision makers assess the impact of their policies on natural resources and greenhouse gas emissions. This is an essential improvement to the current high level assessments which are often unsupported by any evidence.
49. Conversely, developing a stress test for the impact that declining natural resources and loss of ecosystem function has on our economy would help to raise awareness of the necessity of SMNR and sell its benefits.
50. It is currently unclear how these decision makers are being up skilled and held to account in their programme development. Clarity on this is a key next step, followed by ensuring all key personnel are on board.

### Working together

51. Collaboration, working together, engaging with the public, “ensuring that everyone has an opportunity to have their say on how our natural resources should be managed at all stages of decision-making” are regularly referred to throughout the NRP. Indeed, as a national resource policy, it is vital that this document reflects the aspirations of the people of Wales in relation to the environment. However, the degree and quality of stakeholder engagement, especially over the last 18 months has veered between intensive and onerous to non-existent. Even the timing of this NRP formal consultation ends too close to the final deadline for publication. Committing to improve the ways of working and the relationship between stakeholders and the government would be make delivery of the natural resource policy objectives more likely.
52. Whilst the SoNaRR report provided a useful evidence-base on the state of natural resources, SNMR involves both natural resources and **management**. The way in which decisions are made is often a root cause of environmental decline (or recovery), and as such should be a focus of the NRP. In a similar manner to which the risks, challenges and opportunities helped shape the environmental priorities of policy, the same approach could be applied to developing management priorities in line with the EA ‘ways of working’. Having systems in place that set goals, monitor progress and reward success would aid delivery of SNMR.

### Capacity and funding

53. Uncertainties caused by changes in EC funding, post EU, pose a major threat to the deliverability of this Policy. At the same time, staff capacity has been diverted to planning for post EU. It is therefore vital that these areas of work recognise that they have an objective of delivering the WFG Act goals and SMNR.
54. This is a once in a lifetime opportunity to design new support mechanisms to deliver on the goals and therefore including SMNR as an objective is critical.
55. The key opportunities for Wales identified through the recent Welsh Government's EU transition workshops were based on maximising our competitiveness by taking advantage of Wales' reputation for a high quality environment. At the moment we are in danger of being blinded by our own rhetoric to the fact that there is serious work to be done to restore and enhance our ecosystems before they can support the ambitions of Wales in a post EU future. The NRP is our chance to put in place ambitious policies that will contribute to Wales' continued prosperity, based on a natural environment we support and cherish.

Anne Meikle  
WWF Cymru.



# February 2017



## **INTRODUCTION**

1. The Welsh Local Government Association (WLGA) represents the 22 local authorities in Wales, and the three national park authorities and the three fire and rescue authorities are associate members.
2. It seeks to provide representation to local authorities within an emerging policy framework that satisfies the key priorities of our members and delivers a broad range of services that add value to Welsh local government and the communities they serve.
3. The WLGA welcomes the opportunity to contribute to the consultation to inform the development of the Natural Resources Policy.
4. The three priority themes identified for the Natural Resources Policy align well with the Well-being of Future Generations (WFG) Act's requirements. Taken together, they get the point across that natural resources should not be considered in isolation but as part of a whole, interconnected system. The type of growth we support and nurture today is vitally important for future generations.
5. The focus in the consultation document on green growth and nature-based solutions to some of the major issues faced by society, the economy and the environment is welcome. It gives a clear signal that steps we take to look after our natural resources can actually help us create more resilient communities: they should not be viewed as 'optional extras'.
6. The link made with individual and community well-being forms part of this whole system. Future well-being will depend on the resilience we build into our communities. Placing natural resources at the heart of this resilience is wholly appropriate.

7. A strong environment - and its associated ecosystems services - ultimately underpins both the economy and society and, therefore, general well-being. Conversely, a deteriorating environment will have serious negative economic and social consequences, which could include poor health, increasingly unequal access to resources, safety risks (e.g. flood risk) and shortages of many of life's essentials - food, water, clean air, energy.
8. The WLGA therefore supports the three themes that are identified.

### **Key steps to deliver on these themes**

9. There is an inextricable link to the Well-being of Future Generations (WFG ) Act in the contribution that natural resources have to the social, economic , environmental and cultural well-being of Wales.
10. There needs to be continued support (financial, technical and legal) for the delivery of NNRP for example in the development and delivery of renewable energy.
11. The support must also ensure that advice to business has sustainable development at its heart, supporting green forms of growth across all sectors and giving a clear signal about the types of activity that we want to see thrive and develop in Wales.
12. It is essential to investigate opportunities which will present themselves in any new 'post-Brexit' Regional Policy to include payment for ecosystem services, especially as a means of support for rural areas and communities.
13. In addition to the development and use of renewable energy, there need to be 'hierarchies' established in terms of our use of energy, waste services and transport such that the ideal, first, is elimination(as far as possible) of unnecessary use of resources, followed by usage that is efficient as possible (to minimise resource use) with sustainable forms of use encouraged(e.g. reuse and recycling as part of a 'circular economy'; renewable energy; public/low carbon transport and active travel) – all favoured over historic conventional patterns of resource use.

14. There should be support for innovation in the public sector, recognising that this does run the risk of failure. However, any such failure should be viewed as positive provided that bodies have applied the principles of the WFG Act and 'fail forwards', learning from the experience and adapting behaviour accordingly.
15. Acknowledge that internationally there is growing recognition that nature-based solutions can form part of a viable, cost effective and efficient solution to challenges such as climate change, flood risk management and water pollution, as well as support in tackling some of our key public health issues, diabetes, obesity, air and noise pollution and how, by utilising nature-based solutions, we can contribute towards the 7 goals.
16. Advice and support is essential to help organisations understand how nature-based solutions might offer them a way forward- often in line with the 'prevent principle of the WFG Act (e.g. prevention of flooding; prevention of diabetes, mental health issues) and in some cases, an economic development opportunity (e.g. tourism opportunities, timber-based businesses)
17. It must be acknowledged that the benefits to biodiversity and ecosystem resilience can be primary benefits, secondary or even tertiary benefits – the importance is that the benefits are realised.
18. There is benefit in SoNaR, NNRP and the Area Statement being out of synch with the Well-being Assessment, Objective setting and Well-being Plans. The overlap will ensure that these documents are kept alive and relevant and regularly reviewed as part of the Annual Report on progress on WB objectives and WB Plans
19. The NNRP must be an integral part of the determination and delivery of Carbon Budgets – but not just a tick box approach but one of consistent, continued and integrated delivery.

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20. There need to be connections and recognition of those connections between terrestrial and marine and the impact that the economy can have on both e.g. pollution of marine environment with the by-products of the economy.
21. Reference is made in SoNaR for multiple benefits to be realised. Multiple benefits don't just happen, they need to be clearly identified at the start, not just let's see what multiple benefits (whatever they are) will come out of this. If you do not plan for multiple benefits will they happen? (reference back to point 4) In some instances the primary reason and benefit will be environmental but with secondary benefits to health. In other instances, the primary benefit may be economic but through the action taken the environment benefits accrue as secondary (e.g. habitat restoration).

### **Barriers to taking this approach forward**

22. The Area Statements are informed by the NNRP. There should be not expectation that the 'boundaries' of the Area Statements being produced between 2017 and 2019 will be the same in the next phase. It must be clear that the SoNaR informs the NRP and the NRP informs the Area Statement and thereby what and where action needs to be undertaken – so the area boundaries could be different to address the identified issues.
23. There is a scepticism about nature-based solutions and the ability to develop payment for ecosystem services, which needs to be overcome.
24. The public (and political) reluctance/resistance/opposition in relation to policies that might encourage more sustainable levels of consumption, encourage higher levels of re-use and recycling, use of public transport, active travel or electric vehicles, and to the development of some forms of renewable energy (e.g. wind farms)

- 25. Failure or unwillingness to recognise the role natural resources can play in securing long term economic development, instead preferring short term 'quick wins'
  - 26. Difficulties of trying to develop a circular economy in Wales given the international operation of commodity markets.
  - 27. Audit regimes that currently engender a risk-averse mentality which will not encourage the types of new approaches needed to address deep-seated and complex issues.
  - 28. Resistance from professions to changes that may undermine current systems/funding on which their professions are based (e.g. medical treatment as opposed to nature-based solutions)
- 

**For further information, please contact:**

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## Consultation Response Form

Your name: David Williams

Organisation (if applicable): Llais y Goedwig (community woodlands in Wales)

email / telephone number: williams-hartwell4@hotmail.co.uk

Your address: Troed-y-Bryn, Ty Trappa, Pontnewydd, Cwmbran, Torfaen  
NP44 1BH

**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.

*Overall the themes identified are very much what would be expected - having drawn on extensive engagement through the legislation that has been developed over the past 5 years or so - including the creation of Natural Resources Wales, the development of the Wellbeing of Future Generations Act and ongoing engagement with the Environment Bill as examples.*

*Many of the key challenges have been set out, but what is less clear is how these might be addressed. A very real challenge is fragmentation of approach, continued silo working within government departments, and mechanisms for publically assessing 'conflict' situations. For example developing the 'Circuit of Wales' has clear natural resource impacts on the environment, but delivers strong potential economic opportunities in an area that badly needs it - so hence the mitigation planning around maintaining green space corridors, adding to biodiversity through planned planting,*

*creation of nest sites, etc should become part of the natural resource planning required and implicit in every major infrastructure project.*

*The reality is that competing demands often have unequal resources, particularly in terms of funding - so for example grant funding regimes for farming and for forestry in upland Wales are quite different. A very real challenge then is to adjust and amend funding regimes - especially grant funding from the public purse - to support natural resource planning. Grant funding can potentially distort or cut across what may be positive and desirable forward planning outcomes - it should not be, as an example, that the farmer who wants to plant a small woodland is penalised through the grants system because he or she choose that option rather than leave land as rough pasture.*

*Another major challenge is the working at large scale - rightly identified as key to ecosystem resilience. The more partners, means more diversity of views in any planning undertaking - so time and effort is needed to build that connectivity between people as well as between places. Therefore it makes sense to take time to understand what connections already exist to ensure that communication and engagement build on what exists and does not ignore or duplicate it - which is a sure way of getting resentment and distrust!*

*Funding and resource allocation needs to consider not just the unintended consequences that may arise (as in the example of the famers small woodland) but also the 'unplanned additionality' of good project and natural resource planning - so that there is scope to 'add to' resource base. An example of this would be where woodland creation - for a biodiversity objective or a long term timber creation objective - also has a positive impact on water basin retention and flood risk reduction. In other words natural resource planning in the whole considers the multi-factorial benefits and helps reduce both silo thinking and silo planning.*

*It is also important to recognise the challenge of long term planning - and potential 'policy drift' as new policy development pushes out the old - hence regular review and refresh is required - so that phase thinking is more in decades rather than years. This has to be an outlook in forestry - it take 40 years for a tree to grow, but maybe only 40 seconds to take it down (depending on equipment used!)*

*Regularly gathering evidence - and so getting trend data - is crucial, and this does seem to be recognised - although it could be expressed more succinctly. The annexes in this document are very good in this respect - clear, concise and giving good headline areas. what will be useful is underpinning guidance on 'what good looks like' , not just as in 'spot' case studies but in longer tem studies and trend analysis.*

*What is important is to be ready to learn the lessons of the past - and be honest that mistakes will be made, but that we can learn from them. In the field of forestry for example, was it wise to create monoculture larch plantations - no it wasn't, and it has*



*led to widespread felling with the spread of phytophthora ramorum. Yet was mass felling of larch when a few infected trees were found, the right approach - again probably not, as otherwise how will one see natural resistance? Hence natural resource management as a whole has to recognise things may need to change so that learning is applied to practice in good time.*

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

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: *Happy for responses to be public*

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# Welsh Government

## Consultation to inform the development of the Natural Resources policy

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Prepared for: Welsh Government, Floor 1 East, Cathays Park, Cardiff CF10 3NQ

Author: G. Hilton

Date: 11/02/2017

Status: Submitted

Consultation  
Response  
Form

**Your name:** **Graham Hilton**

**Organisation (if applicable):** **Resource Efficiency Services**

**email / telephone number:** **[graham.hilton@reses.co.uk](mailto:graham.hilton@reses.co.uk) Tel: 07802 433087**

**Your address:** **Hen Capel, Glasinfryn, Bangor, Gwynedd. LL57 4UN**

**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;
  - The priority themes and key challenges (including the additional ones identified by SONARR) are addressed below, and..
- the barriers that need to be addressed.
  - Are covered along with the “key asks” in the final sector of our response.

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

We have added an introductory section to our response, to provide some context for our primary focus on the role of woodland in the natural resources policy of Wales.

We have also added two appendices, to highlight key passages from other recent Welsh Government Reports, and the experience of RES in dealing with other forestry related authorities and organisations which may be relevant to the review.

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:

## **Introduction**

We believe that as part of the drive for better management of Natural resources in Wales, Woodland presents a unique opportunity to expand the protection and productivity of the Welsh land-base to the benefits of the Welsh people, their environment and economy.

This consultation is intended to inform the first version of the Natural Resources Policy, by March 2017 of which it says:

*“The Natural Resources Policy will form a key part of the delivery of the sustainable management of natural resources by setting out:*

- *What Welsh Ministers consider to be the key risks, priorities and opportunities for the sustainable management of natural resources in Wales, including what should be done in relation to biodiversity and climate change; and,*
- *Welsh Ministers’ policies for contributing to the sustainable management of natural resources. “*

While the scope of the review is wider than forestry, this response, from Resource Efficiency Services (RES) has focused on the forestry and the woodland sector for a number of reasons, namely:

- The significant opportunity to improve the economic and environmental contribution of the sector, while supporting sustainable construction and the bio-economy.
- Its discrete nature and role in the character of the Welsh landscape.
- The significant role played in it by the Welsh Government Estate.
- RES’s particular experience in the forestry and resource efficiency sectors

The challenges of maintaining and developing environmental best practice, under the constant financial pressures on the public sector, are in part offset by the opportunities afforded for specific future action outside of Europe.

Freed of the approaches which have been designed to accommodate the largest forestry and farming economies across a wide range of European players, we can now tailor an approach more closely to the specific needs and opportunities for Wales, delivering the requirements of the Well Being of Future Generations and Environment Acts and much more besides. This may have already been noted by the roundtables and workshops on the UK leaving the EU, but is worthy of direct inclusion in planning for management of Natural Resources.

Alongside this improved freedom to design an efficient wood ecosystem for Wales, we believe that the private sector stands ready to take its place in financing and organising supply, processing and use of this invaluable resource. New technologies and business structures are emerging to complement and improve the traditional industries and the wood on which they should increasingly depend.

We would like to see Welsh Government build on SoNaRR, which is “not designed to identify fully worked up solutions”. This can be achieved by creating an opportunity

register, alongside SONARR's risk registers, targeting those who can deliver the benefits of expanded woodland management.

The policy debate, to date has talked about key risks, priorities and opportunities, but many do not progress beyond broad aspiration, with little evidence of delivery or the resource required to deliver it. This should now be resolved in the form of detailed strategic options, with an overall vision of what might be achieved, backed by compelling business cases for delivery of key objectives based upon maximising the economic and environmental potential of every tree.

Forestry is central amongst those industries that have an external and renewable economic output, hence its status as a key sector, high on the list of natural resource management priorities. It has the potential to be an exemplar for "green growth", from landscape protection and management, through expansion of Welsh manufacturing, to delivery of low environmental impact housing, materials and fuel.

At the heart of this potential lies a sustainable economic approach to maximising the opportunities from a productive estate which will in turn underpin the delivery of environmental excellence, there and on the wider land base. Delivering this opportunity at scale, and the creation of associated assets and infrastructure will only be possible if there is optimisation of the overall opportunity from each sector, such as Forestry, and will require Government to look beyond some of the sectional interests or departmental insularity.

The future is not a choice between the environment or production. Good management is both productive and environmentally beneficial, with economic sustainability underpinning the reliable delivery of a range of long term benefits, guided rather than supported by the public sector.

### **Priority Themes (and key Challenges)**

- *Accelerating green growth by increasing resource efficiency, renewable energy and supporting innovation.*
  - Resource efficiency includes the efficient creation of useful resource, such as building material, fuel and food and its efficient use/re-use
    - Specifically, the SoNaRR report identifies the risk of declining timber availability and the need to establish new woodland/woodland management as a major priority, in response to this resource threat and as a central plank of improved resource management.
    - This requires a business plan for the economic and environmental management of new and existing woodlands.

- Forestry and electricity generation are the first two “key industries” named in the consultation. With two tons of low carbon fuel as a co-product of each ton of home grown timber, these are potentially complementary in addressing security of materials and energy in an environmentally beneficial way.
- The UK is one of the largest importers of wood in the world, with “Wales’s economy consuming large quantities of electricity and timber”. Displacing part of this imported resource with domestically sourced product will increase the resilience of growth, the economy and, through appropriate management environmental benefits, against a backdrop of “uncertainty around future markets”.
- Growth in the provision of “offsite” and circular solutions in the building industry is in large part driven by developments in construction using wood elements and engineered timber. Wales has invested heavily in research in this area and should ensure that it develops timber supply to capitalise on this emerging industry and its social and economic benefits.
- Support for increased use of market mechanisms, supported by NRW, was widespread in the responses to the 2014 White Paper on sustainable management of natural resources. This was partly in response to concerns over resource availability under the current regime.
  - This should be further explored through integration of “whole tree values” (timber, other materials, fuel, carbon and ecosystem services) and through integrated supply chain approaches to value, where direct linkages between users and land managers are exploited.

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

- Improved management of natural resources arising from the land base in Wales, should deliver a larger productive estate, capable of economically supporting best environmental practice in pursuit of biodiversity via...
  - Impact on water, including the management of catchment areas to reduce flooding, improving soil and nitrogen retention and providing biodiverse environments for a range of wetland species. Specific management of flooding through woodland reservoirs and shelter belts of woodland or short rotation coppice products can form part of both agricultural and urban planning systems. (Environment Wales act – species/habitats, sustainable management.
  - Impact on biodiversity. While historic plantation forestry has often been regarded as detrimental to biodiversity, it is now widely accepted that managed forestry guarantees a wider range of beneficial outcomes,

including biodiversity and amenity, than the unmanaged woodland which increasingly characterises the UK. The protection of ancient woodland, and ancient trees should run in parallel with an ambition to strategically expand and manage the balance of the woodland estate to provide a range of regionally appropriate biodiverse environments, within a productive estate.

- Impact on amenity. Future management of woodland in Wales should recognise the multiple demands of amenity, from expansion of woodland contribution to landscape and leisure, underpinned where possible by practical contributions to environmental or economic outcomes. The use of trees for screening, shading and water management in urban planning is consistent, both with amenity use and, on a consolidated basis, generation of a useful resource and carbon sink. At the other end of the scale, the public perception of Wales's Forests, is of a landscape scale to match its lakes and mountains and to continue the tourist draw of all three. Maintaining this scale, and the industries which rely upon it, requires long term investment which the private sector stands ready to participate in, for the protection and expansion of the estate, it's output and the resulting amenity.
- Managing for multiple benefits. This has been highlighted within the Natural Resources Policy Statement, with our ecosystems capable of providing us with a wide range of services and benefits. Taking all of these into account, including their intrinsic values, when we make decisions about how we use them, can provide multiple benefits for the long term, but requires focus on outcomes at three separate levels:
  - **Outcomes for Wales** – The benefits flowing from using “nature as part of viable cost effective and efficient solutions”, including increased green infrastructure (Urban trees and farm woodlands), water treatment systems (catchment, woodland reservoirs and woodland/coppice filtration) better soil management. carbon, water & productivity (including streamside corridors and strategic boundary planting on farms) community based woodland, natural flood management and carbon sequestration. Making this “cost effective and efficient” will require.....
  - **Optimised value for each tree** – Like a butcher selling “all of the pig but the squeal” sustainable management of woodland (and other natural resources) will require a consolidation of values from each tree (timber, carbon, fuel, other materials and ecosystem services) If we are to unlock and realise their full potential. While amenity, biodiversity or carbon (the so-called ecosystem services) are often, incorrectly, seen as

conflicting with productive management, economic drivers often conflict between sectors to undermine the ongoing viability of woodland. The increased use of biomass has helped to improve economics of woodland, its proponents often work in isolation of other elements of the supply chain, as do those who seek to monetise ecosystem services. Only a coordinated approach to combining these values to create a compelling value proposition for land owners to plant and manage trees. This will require.....

- **Consolidated supply chains** – To deliver the coordinated approach to woodland value will require a similar coordination in the associated logistics and processing, to deliver progress in implementing Government’s priorities and opportunities. The biological potential of Welsh woodland, combined with the demand for buildings and fuel make the high percentages of wood a continuing “own goal”. Modest establishment of productive woodland could, in time, support another large saw-mill in Wales, along with insulation from co-products, fuel and “home grown homes”. These outcomes, and the economic viability they bestow on the resulting forestry, require a strategic across value streams and regions, in contrast to the fragmented approach which currently pervades industry and regulation alike.
- *Improving community and individual well-being by taking a place and landscape based approach*
  - Per the consultation wording, it is important that “viable, cost effective and efficient solutions” are created “alongside (complementary) or as part of existing activities such as farming, forestry and urban development.” Forestry has a unique opportunity to contribute to rural resource generation for use in urban development.
  - Individual and community wellbeing, including sustainable rural communities, will depend upon
    - A strong business case for Forestry accessing “multiple benefits” applied locally per local level statements (below)
    - Central planning of infrastructure to ensure the ability to “work at scale” to consolidate the opportunities afforded by increased productivity of timber, fuel and ecosystem services.
  - Possibilities arising from the local level statements created by NRW which flow from the NRP (national natural resources policy) – This could potentially include some devolution in management of natural resources e.g. forestry. This could be overseen by public service boards (PSBs) for delivery of local outcomes, within a wider national resource and biodiversity plan.



## **Challenges**

We believe that Forestry speaks strongly to a number of the “Key Challenges”, identified in Annexe 2 of the consultation. but that there is a need to engage commercial sector interests in optimising and consolidating responses to these challenges. Many of the challenges at hand risk falling to the public purse or regulation, if not incorporated with the parallel opportunities for commercial green growth.

***Safeguarding and increasing our carbon stores** A loss of carbon storage in soils, especially in our peat rich uplands, and in biomass, particularly where woodland is permanently removed is potentially diminishing our ability to regulate our climate.*

The expansion of sustainable Forestry will increase the absorption of carbon by younger trees in early stages of growth (most species of trees absorb 60% of the carbon that they will ever absorb, during the first 40 years of their life) in addition to providing a long-term store of “embodied carbon” in the wider use of wood products for building. The co-products of timber production create low carbon “closed loop” fuels to reduce use of fossil fuels in the resulting buildings and their wider power sources.

***Maintaining 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.*

A core element of sustainable management of natural resources must be to address their productive capacity, both in supporting natural ecosystems and in generating useable outputs for building energy and amenity. These outputs can support the economy and welfare of the people of Wales, while generating sufficient incomes to create economically sustainable and resilient forests which can deliver a range of reliable benefits based upon reduced reliance upon public policy or financial support. SONARR has, alongside a number of other commentaries, identified a looming gap in the productive capacity of Welsh softwood plantation Forestry. Addressing this gap through expansion of woodland cover, including plantation softwoods, and improved productivity from consolidated management of smaller woodlands is a major priority to protect a key renewable asset.

***Reducing the risk of flooding** Increased soil sealing and compaction from farming practices and urban development resulting in loss of water storage capacity and more surface water run-off. The loss of natural coastal flood defences is a key challenge.*

Woodlands have a range of contributions to make to flood prevention, control and defence. The use of catchment area planting has the capacity to balance wider water deposition, while the use of woodland reservoirs is increasingly seen as a specific local management tool. The latter, increasingly used as a planning “offset”, can generate valuable peri-urban amenity, while avoiding the soil compaction and degradation associated with other informal flood plains. In addition, the incorporation of perimeter woodlands and “shelter

belts” into a range of farming situations has the capacity to manage run off (including fertilisers) while contributing to farm incomes and resilience, if incorporated into consolidated group schemes.

*Improving health and equity Noise, poor air quality and fly tipping are impacting on 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.*

The attraction of trees as a contributor to visual attractiveness and general “well-being” is already incorporated in much public policy and planning. This is often seen as separate discipline to commercial forestry, with an understandable aversion to felling urban trees and an assumption that urban woodland will inevitably carry a high net cost due to the absence of any productive capacity. Reducing this polarisation, through linkage of semi/peri-urban woodlands (below) would create significant “good quality” green spaces and potentially engage a much wider population in understanding the natural cycles and wider productivity of woodland management. By its nature, woodland has the ability to maintain a more consistent habitat, due in part to its more restricted access as well as its ability to absorb and control a range of pollutants including sound.

*Improving the quality and maintaining the availability of water In Wales, there is a high dependency on our rivers for our water supply. Diffuse and point source pollution from a range of sources including some land management practices, sewerage discharges, abandoned mines and misconnected sewers is affecting our water quality.*

In addition to the wider water and soil management abilities of woodland in regard of flooding and run off (above) it can also provide specific intervention and remediation. While inappropriate use of conifers has been blamed for acidification and eutrophication in the past, some species (including short rotation coppice and energy crops) have been used to specifically absorb water and air borne pollutants. Specific work has been conducted in the UK on former mining and defence sites, and in Europe, heavy metals have been recovered for use in the process of woodland remediation of contaminated land.

*Improving the quality and connectivity of our habitats 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.*

As with any other form of cultivation, Forestry and Woodlands can have a range of impacts, which need to be carefully managed, both on an individual scheme level, and through a coordinated overall strategy. The development of widespread portfolio approach to additional woodland, alongside pockets of expanded “tree farming” are capable of maintaining appropriate balance while significantly increasing the scale and benefit of Welsh woodland.

*Retaining the distinctiveness of our places and historic landscapes Wales is renowned for its attractive and historic landscapes was impacted by developments relating to energy, transport and tourism through forest design.*

Woodland and Forestry are an integral part of the identity of Wales and its image amongst the important tourist customer base

## **Barriers to Overcome and Proposals – introduction**

We have focused upon three key existing barriers, in each case following this with our proposals to access the opportunities (above) via a series of actions.

- **Access to land** - is the biggest barrier to expansion in woodland cover according to a number of enquiries investigating continued failure to expand woodland cover or to bring woodland into active management. **Future policy, should therefore focus on two key areas.**
  - Manage existing Estate to best effect, making the most of the existing woodland to optimise outputs (productive and environmental benefits. This should include reviews of the regulatory approach to local and national woodland approvals for management and possibly exploring New management models for the WGWE. There is clear potential to attract institutional investors and more closely align private and public planting to deliver structural timber for construction and liberate additional woody biomass for other markets such as renewable energy.
  - Making the business case for new woodland and for integrating woodland into other land management activities, such as farming where it can be used as a tool for management of water, soil and nitrogen for instance without requiring a change in fundamental business activities of individual farms.
  - Collaborative planning between land users, public and private, farming and forestry, productive and amenity should be used to unlock composite benefits of scale and shared facilities and costs.
- **Fragmented Nature of the Value chains**, which currently compete for primary access, often undermining the wider value of future forestry if viewed from a consolidated or “cascade” approach. **This requires a consolidated approach to developing and packaging benefits from woodland** to appeal to those influencing its creation
  - While timber, biomass, carbon credits and other eco-system services are aimed at differing markets, they all contribute to the viability of individual woodlands. Following the butcher to “sell all of the pig, but the squeal” is part of creating compelling business plans for woods, new and old, and driving their management for a range of social economic and environmental benefit.

- This approach can possibly be delivered through a central “clearing house” for management of new and existing trees. This would help to deliver an overall view of supply and to generate initial scale, then others can come on board. It could be kick started by an initial approach of
  - Supply Chain Optimisation. Auditing, promoting and subsequently developing, supply chain capacity, to:
    - Showcase and develop existing wood product availability and associated processing and supply
    - Seek to fill gaps in the existing supply chain after encouraging collaborations on:
      - Procurement of raw material
      - Processing and manufacture – including standard specifications
      - Marketing
      - Use a consolidator or integrator approach to optimise
        - Best practice
        - Stock-holding, working capital and shared services
    - Develop new products and services for the key potential wood markets (including risk mitigation through initial demand creation)
      - New products such as engineered timber and wood fibre insulation and panels
      - New systems such as panellised “sub-modular” construction to deliver benefits through off-site and flexible life building.
      - Additional services such as sustainability and carbon reporting for both social license and value enhancement.
    - Use the consolidated requirements to further optimise collaboration with
      - Wood Fuel
        - Best value and logistics will be created by full utilisation of co-products and harmonising logistics for raw material for both fuel and products.
      - Woodland Owners
        - Optimisation of the supply chain (e.g. “milk round collection of fuel/timber and addition of value propositions such as carbon sequestration) allows greater value for the sector and higher value for woodlands, stimulating increased planting and management.

- **Lack of overall strategic vision.** While individual land owners processors and users have driven developments in the growth and use of wood, the overarching opportunity is often missed. **This should be addressed by the creation of an overall roadmap for Wales, highlighting the consolidated opportunity and:**
  - Giving certainty to investors and stakeholders, based upon the overall levels of achievement which might be possible from widespread deployment and co-ordination of detailed and local initiatives. Too often in the past, there has been a gap between high level aspiration and detailed delivery, with implementation on the ground frustrated by conflicting demands of a range of authorities and stakeholders. This should be addressed by a detailed road map which can feed into detailed priorities and options for inclusion in regional and local planning, without undermining the wider national opportunities. This might include...
  - Inclusion of wood in an industrial strategy. Driving sustainability and growth in the Welsh forest industries sector by addressing the local needs and wider infrastructure. Powys is a good example of how local demand is encouraging the local processing (and maybe even local forest management) to support it. National infrastructure will be stimulated in turn, and should be planned accordingly. e.g. if 20% of the 100k Ha forestry target were plantations Wales would need another BSW scale saw-mill.
  - Using the map to inform wider policy and practice, beyond the direct natural resources sector. A number of wider approaches to policy fulfillment and Embodied carbon assessment. For instance carbon accounting can drive resource efficiency in construction and use of timber products. This move and its resulting benefits, can be further supported by the planning process, and in time building regulations. Public procurement could also support the benefits of local wood production and use, including the use of 'Wood Encouragement Policies'. such as that adopted by Powys

## **Conclusions - Next Steps**

Forestry represents a both a major part of the current Welsh economy, and a significant “post-Brexit” opportunity to generate renewable Green Growth.

Properly planned and managed, this growth can contribute to the enhancement and protection of urban and rural environments, contribute to the earnings and security of a range of industries, from farming to wood processing currently reliant upon imported material, and generate a source of materials and fuels which will protect the economy and the environment alike.

Welsh Government should ensure that the opportunities arising from a more domestic focus on the development of Forestry, processing and deployment form a major part of the future roundtable and workshop discussions, convened by the Cabinet Secretary for Environment and Rural Affairs in response to this consultation and in developing the first statutory policy.

The consultation references “detailed” sectoral engagement” and it will be largely through sector engagement and coordination, including the key forestry sector, that commercial interests can be best brought to the optimisation and delivery of this vital work.

A roadmap for production and use of wood should be developed and resulting outcomes incorporated within the planning tools which will guide both national and local management of natural resources.

## **Appendix 1 - Resource Efficiency Services (RES) and the UK wood sector.**

RES is a small consultancy business, operating in the resource efficiency, Forestry and wood industries. Their work over the last three years has included strategic reviews for English, Welsh and provincial Canadian governments and trade organisations, around maximising the value of forestry (including external investment) and its outputs. Copies of this work can be supplied, with two major reports published including the “Woodstock” feasibility study.

Two emerging themes from this work have been

- The need to unify value and supply chains.
- The need to build demand, with imported material where necessary, while building domestic capability.

We believe that a proposition, based upon this work, and the extensive public and private networks behind it, can create a range of business opportunities supporting competitive domestic supply chain.

Our discussions in recent months suggest that there is significant support for the concept of closer supply chain integration from a wide range of stakeholders, on the following basis:

- UK Government (DEFRA/BEIS/Forestry Commission)
  - Efficient, unified supply chains to support new industry.
    - Biochemical
    - Carbon – including building
    - Bioenergy as part of new combined value
  - Case for management of woodland.
  - Renewed investment in commercial woodland, post “Brexit”
- Industry Organisations (Grown in Britain, Confor, Wood for Good, CTI, WHA)
  - Improving supply chains
    - Timber and Biomass
    - Collaborative business models
    - Approaches to funding
- Woodland Owners
  - Business case for clearing/regenerating undermanaged woodland
- NGOs (Including Greenpeace!)
  - Not averse to bio-energy, efficiently managed, carbon debt (investment) recognised.
- Independent Biomass Suppliers
  - Wish to offer alternative to national supplier but lack integration and credit.
- Project Developers
  - Frustration at lack of “bankable choice”.
  - Trying to create unique supply chains – recognise integration is required
- Investors
  - Appetite for combining and crystallising future values
- Sawmills
  - Need access to small percentages of quality logs in undermanaged woods
  - Want woodland investment/regeneration to address future supply
- Merchants
  - Want improved UK supply with currency and disease disruption

## **Appendix 2 - Welsh Government Natural Resources Policy Statement**

### **(p29-30 and 35) The current importance of Forestry**

**In terms of its contribution to the Welsh economy, the forestry sector** has an annual Gross Value Added of £455.7m (comprising £19.9m from forestry and logging; £147.7m from the manufacture of wood and products of wood and cork; and £288.1m from the manufacture of paper and paper products). The sector directly employs 8,500 people with a further 2,800 people self-employed, bringing the total number of people working in the sector to 11,300. There are also small scale local enterprises and individuals engaged in economic activity relating to non-timber products.

Farm woodland provides an opportunity to diversify farm practice. Most new tree planting takes place on agricultural land and there are significant opportunities for farmers if this is better integrated with their agricultural business as well as with the landscape and wider environment. Using agroforestry techniques could have potential to increase the productivity of agricultural holdings while also locking up carbon and contributing to production of useful forest products.

There are approximately 306,000 hectares of forests and woodlands in Wales and they are a valuable natural resource helping Wales's response to the effects of climate change and meeting the needs of people and communities. Forests and woodlands are predicted to remain a net sink for atmospheric carbon and current sequestration from Welsh woodland is estimated to be 1,419,000 tonnes annually.

Most modern building materials are produced using large quantities of fossil fuel. Wood is unique as a building material. When it is grown in sustainably managed woodland, its carbon footprint is near to zero – all the carbon it contains is absorbed from the atmosphere. Only a very small proportion of fossil carbon is used and some soil carbon is lost to the atmosphere after the woodland is first established, although this can be minimised by reducing cultivation intensity. As a near zero-carbon material, wood will be an essential ingredient of sustainable building practice in future. Wood which is not suitable for building can be used as a sustainable fuel, providing that it is sourced from sustainably managed woodland and the felled trees are replanted or regrow immediately.

**Payments for Ecosystem Services** The Welsh Government is considering all possible funding streams for developing more sustainable and robust land management, and is keen to explore the possibilities of attracting private funding to secure and enhance ecosystems services provided by land from the landowners. This approach is broadly termed payments for ecosystem services (PES). PES can be defined in terms of payments to individual or groups of land managers and others to undertake actions that increase the resilience of ecosystems so that they are able to provide increased longevity, quantity and quality of desired ecosystem services, which benefit specific or general users. Developing markets for ecosystem services is a crucial tool for delivering sustainable natural resource management. It recognises the importance of ecosystems and their services to the economy and well-being of Wales and can help deliver the positive changes and benefits for wildlife, water quality, flood risk reduction, health and well-being, carbon safeguarding, and rural communities.

In particular, we are working to create the infrastructure and frameworks to support new markets for ecosystem services. Realising the value of ecosystem services and generating an income for their management allows us to realise both positive environmental outcomes and provide farmers and land owners with new income streams. This is one of the many tools that the Welsh Government is using to deliver its key priorities of creating jobs and growth and tackling poverty, while ensuring we maintain a



resilient and diverse environment as well as demonstrating the benefits of the ecosystem approach to natural resource management and the development of ecosystem markets and a green economy.

**Better located and managed woodland and trees means:**

- An increase in the species richness and structural diversity of our trees and woodland, which, together with connecting fragmented woodland and scrubland habitats is key to increasing their resilience and can help support biosecurity.
- Planting trees in interception sites may help to reduce the risk of flooding downstream and improves our resilience to drought.
- All sustainably managed woodland has significant potential to provide a place for nature and for natural processes to work effectively. This can be improved by both restoring connectivity within habitat networks and maintaining significant areas of woodland of appropriate quality so that species that are dependent on woodland habitat are able to find sufficient area of habitat which is relatively undisturbed.
- Well planned woodland management ensures that woodland habitat remains of a high quality throughout management work.

**More local renewable energy generation.**

We will optimise the way we use our renewable energy resources to benefit the people of Wales, now and in the future. Moving from a system where centralised power generation is the norm, to a system where more energy will be generated, stored and used locally from a mix of renewable sources will reduce the need to extract fuels from our geological resources.

By developing local solutions we will reduce the pressure on the grid infrastructure, become more resilient to fluctuating energy prices through a clean, secure supply of sustainable energy, which will help to meet our climate change commitments. Local generation is already offering communities the opportunity to develop and invest in local schemes, and to generate a return from these projects that can be used to meet local priorities. We will increase the scale at which this happens.

## Consultation Response Form

Your name: Sarah Johns (Secretary)

Organisation (if applicable): All Wales Pollution Expert Panel on behalf of Wales Heads of Environmental Health Group. The Directors of Public Protection Wales (DPPW) represents Local Authority regulatory services that directly affect the health, safety and well-being of local communities in Wales. Under DPPW there are several specialist/technical panels; one of which is the All Wales Pollution Expert Panel.

email / telephone number: [sarah.johns@pembrokeshire.gov.uk](mailto:sarah.johns@pembrokeshire.gov.uk) 01437 775474

Your address: Pembrokeshire County Council, Public Protection Division, County Hall, Haverfordwest, Pembrokeshire SA61 1TP

**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:

The most important public health challenge mentioned in this document must be that of air quality. When considering the health effects of the current problems, this is clearly allied to the effect of road traffic noise on many residents. It has been established by recent research that the negative impacts of poor air quality and excessive road traffic noise are very similar, but sadly both problems are generally affecting the same communities. The only relevant example given seems to be the reference to green corridors which presumably is hoping that more trees or green façades might help reduce the impact of road traffic emissions. Whilst this clearly links with other ecosystem benefits, the overall improvement to the poorest communities will be minimal to say the least. That is not to suggest that it's not worth doing – many of those road corridors are going to be very difficult to improve by any other means. However this doesn't begin to touch on the major policy changes that may need to be made in terms of, local development plans, local transport, modal shift, better planning of schools to reduce commuting etc.

There seems to be a real danger that the focus on the more obvious elements of natural resources will result in a lack of focus on these difficult regional planning issues. There must be areas of improvement that are possible in the medium term by ensuring that the proposed mechanisms can draw attention to better local plans and an overall reduction in the amount of car journeys for people to go about their normal daily work. This cuts across many public policy areas; an example could be to reverse the trend to have separate schools for English and Welsh medium teaching and concentrate instead on positioning schools where parents can easily transport their children without creating additional traffic flow problems. It is interesting to note that in rural areas financial pressure has encouraged the sharing of sites, but in urban areas where we have a bigger air quality problem, no one seems to have addressed the issue of sharing an optimum site. It could be argued that the same applies to hospitals, however even though hospitals recognise they have car parking problems, most highway colleagues would agree that schools generate a bigger congestion problem because of the fixed timing of the journeys.

Other issues are touched upon which are important in the longer term even though the public health impact is less obvious. A good example of this is the improvement of water quality. It is generally true that quality has improved over the last few decades, however it is always going to be difficult to have good quality bathing water at all the right places, but this has a strong but subtle impact on the well-being of the local community. Plenty of evidence supports this issue in terms of the health of swimmers but also in terms of encouraging local residents to exercise generally and use the outdoors for a wide variety of exercise. In Wales we have a good reputation for developing smarter ways of delivering good quality bathing water but also smarter ways of communicating that to the local residents. Welsh government need to encourage these projects to build on the current advantage created by the various partners (Welsh water, NRW, local authorities). It has been shown in Wales that using an approach of predicting water quality accurately to protect water users is a cost-effective way of managing complex bathing waters. Some local authorities are also trying to deal with miss-connection issues around the drainage infrastructure, but this is difficult when there is no clear funding stream for this work. That has been an obvious barrier over the last few years, which seems a shame when there are a number of related benefits as mentioned in your consultation document.

Obviously public water supplies have improved steadily, however private water supplies have been more difficult. Generally the framework is now in place to deal with private water supplies more effectively, but this is still a long term project. Given the current financial pressures on local authorities, this is an area of work which is likely to slow down as environmental health services struggle to deliver all their priorities with less staff.

Soil protection is mentioned in the consultation, but it is not clear what exactly is meant by the reference. It must be said that local authorities are struggling to deal with contaminated land, but this has not been driven by financial constraints, the bigger issue has been the failure of the legislation to deliver its original intention. It should be recognised that there is a long-term risk in Wales given the lack of focus resulting from this failure. This is a particular concern given the amount of new housing being developed on contaminated sites.

The common theme through most of these challenges from our perspective is the lack of true collaborative work and joined up funding. Most of the issues above will only be successfully tackled by much better collaborative work between all the various public sector players. We are not excluding the necessary private sector input, but it seems unreasonable to focus on better partnerships if we have not improved on inter-sector working within the public sector.

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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## Consultation Response

### Form

Your name: D. John Bowles

Organisation (if applicable): Welsh Bee  
Keepers Association (WBKA)

email / telephone number:

djohnb@btinternet.com . Mobile 07449021219.

Home 01286 675833

Your address: Penrhos, Llanfaglan, Caernarfon,  
Gwynedd LL54 5RB

**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:

Thank you for consulting us on the themes and challenges underpinning the development plan for Natural Resources Wales. As the Welsh Beekeepers Association (WBKA) we represent the majority of beekeepers in Wales and do have our own “niche” areas of concern but these all fall within the priority themes and

and objectives contained in the consultation document. Each of these will influence for the better where and how our members live and how they are able to undertake their craft of beekeeping. They, therefore, have our wholehearted support.

The direct financial contribution that beekeepers and the products of hives in Wales make will be relatively modest but the value of the pollination activities of honey bees and other insect pollinators will greatly eclipse this contribution. Under the objective of maintaining biodiversity the WBKA has sought to broaden its areas of interest and influence to cover all pollinators so our feedback and suggestions are made with that in mind.

We welcome the steps to improve links and provide wildlife corridors. These themselves will increase the cover and forage available to all pollinators. One of the major factors affecting the success of pollinators has been the decrease of flowering forage by a combination of “monocropping” grass for silage, the removal of ancient mixed hedgerows and the “improvement” of land for agricultural purposes. We are supportive of the farming community and understand the motives which have driven these changes. Therefore while recognising that some ignore the rules governing the assessment of land before improvement, where controls could be better enforced, we would wish to see encouragement, whether financial or focussed research, given to farmers to allow land to return to a habitat conducive to the breeding and feeding of all insect pollinators ( bees, wasps , hoverflies etc).

In addition to encouraging land to be taken out of intensive use we would also like to see academic institutions and other organisations encouraged to undertake research into the feasibility of developing flowering plants, other than grasses, of good food value which would also feed pollinators.

Other research could be into meadow flowers which could be interplanted with grasses but which would have a shorter period from emergence or regrowth to the flowering/ nectar producing stage so that they flowered before silage was cut would help to return some fields to a more mixed forage without the reduction of productivity that is associated with a return to conventional flowering meadows. One plant family which might be suitable would be the clovers.

With regard to biosecurity we have immediate concerns regarding the potential import of pests which can affect both feral and kept bees. We would like to see support given to further controls on the

importation of both honey and bumble bees - the latter used for glasshouse pollination and more encouragement being given to the propagation of indigenous/locally adapted bees. Linked to this would be further research on whether such pests can be be hosted/passed between different species of bees and other pollinators.

I hope you find this response and the suggestions therein useful and wish you well in the implementation of your new development plan which I look forward to reading.

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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## Woodknowledge Wales Response to the Welsh Government's Natural Resources Policy consultation

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**Prepared by:** Gary Newman, Chief Executive Woodknowledge Wales  
([gary.newman@woodknowledgewales.co.uk](mailto:gary.newman@woodknowledgewales.co.uk))

**Prepared on:** 13<sup>th</sup> February 2017

### Background

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#### About the consultation

The Environment (Wales) Act enshrines in law the 'sustainable management of natural resources' (SMNR). SMNR is an approach to ensure that the way our natural resources are used and the impacts upon them do not result in their long-term decline.

The **Natural Resources Policy** will form a key part of the delivery of the SMNR by setting out:

- What Welsh Ministers consider to be the key risks, priorities and opportunities for the sustainable management of natural resources in Wales, including what should be done in relation to biodiversity and climate change; and,
- Welsh Ministers' policies for contributing to the sustainable management of natural resources.

The Natural Resources Policy is a part of the wider delivery framework for the sustainable management of natural resources and is linked to the Well-being of Future Generations Act and the Planning (Wales) Act.

The question posed in the consultation is as follows:

*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.*

#### [About Woodknowledge Wales](#)

Woodknowledge Wales is a not-for-profit and for public good member organisation. We champion the development of wood-based industries for increased prosperity and well-being in Wales. This means increased use of wood, increased manufacturing of higher value wood-based products and more and better forests focused upon the sustainable production of higher value timber. Woodknowledge Wales began as a publically funded sector development organisation (The Welsh Timber Forum) in 2001 and became a privately funded member organisation in 2016.

Current activity of Woodknowledge Wales is focused on the expansion of homegrown timber in construction and therefore there is an emphasis in this response upon Natural Resource Policy issues related to the provision of timber for the built environment.

#### [General Comments](#)

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The underlying premise of this response is that the expansion of Welsh forestry and Welsh forest industries would be good for the sustainable development of Wales. This accords with various Government ambitions for woodland creation arising from current aspirations under Woodlands for Wales. Well-conceived expansion would deliver biodiversity and climate change mitigation and many more benefits besides – such as:

- Increased employment particularly in rural areas in forest management, timber processing and construction
- Improved balance of trade and security of supply in uncertain future markets (85% of timber used in construction is imported)
- The provision of timber to enable supply into emerging high value markets such as Cross Laminated Timber for housing and tall structures
- Increased renewable resource for energy (reducing fossil fuel use)
- Flood risk reduction, improved air, water and soil quality
- Increased amenity and well-being

The desire to see the extensive and rapid expansion forestry and the forest sector in terms of both volume and value of timber throws down a challenge to all sectors (public, private and third).

#### **CHALLENGE TO WELSH GOVERNEMENT AND LOCAL AUTHORITIES**

The WG, as the largest producer of timber in Wales has an important leadership function, not simply in terms of timber and processing, but also in the development of markets. This should be addressed by the development and implementation of a coherent strategy. This process was begun by the Wales Forest Business Partnership in 2015, in its outline for a

‘Roadmap for Sustainability and Growth’. Woodlands for Wales has succeeded in providing high level and aspirational vision but, evidence suggests that it currently lacks the necessary guide to action.

Bringing a step change to the expansion of both woodland cover and woodland management will involve significant engagement across the supply chain. For instance, rethinking the management of the Welsh Government Woodland Estate (WGWE) may represent a means of engaging private sector capital in expansion of woodland or woodland productivity. They have engaged extensively on private upland in Scotland are fully committed to environmental stewardship but limited by access to land. At the other end of the supply chain, Powys County Council is showing leadership by establishing a Wood Encouragement Policy. It is expected that other Local Authorities will soon follow suit and ultimately it is hoped that a national policy will be adopted to better deliver the Woodlands for Wales vision, by joining these types of initiative.

#### **CHALLENGE TO BUSINESS AND INDUSTRY**

The wood processing industry needs to move from lower value to higher and added-value products and markets. The principle of cascade use requires a focus on high value longer-life products first, with co-product or re-used material feeding lower value processes. Such an approach supports the principles of resource efficiency, but requires a degree of coordination and strategic vision. It should be noted that process flows that deliver optimum conversion value are not necessarily aligned to highest profit to processor. However, cascade use principles would improve the GVA, balance of trade and deliver many other aspects of economic, environmental, cultural and social development. Strategies to enable the processing sector to expand into higher value markets need to be supported by increasing the quality and quantity of timber supply.

The Home Grown Homes Partnership has been established by Powys County Council to provide demand-led stimulus for forest products sector growth in Wales in a way that maximises the economic, social and environmental benefits. Currently there is insufficient construction grade timber produced in Wales to meet the resulting demand.

This Partnership is chaired by Powys County Council and consists of 7 social housing providers, Welsh Local Government Association (WLGA), Natural Resources Wales (NRW) and Community Housing Cymru (CHC) and is advised by Woodknowledge Wales. Integrating “upstream” supply to this approach will de-risk the development of local processing and increased GVA across the new supply chain.

It should be noted that the RSL sector is particularly committed to the development of local supply chains. RSLs have done much to stimulate local supply of many construction products such as windows, doors and boilers etc. and is greatly committed to using homegrown timber.

### **CHALLENGE TO ENVIRONMENTAL NGOS**

The World Wildlife Fund (WWF) recognises the critical role that plantation forests play in terms of meeting the material needs of society and enabling the protection of vulnerable forests and species. But all too often environmental NGOs limit their thinking to the natural environment and ignore the sustainability benefits of utilisation. For example – wood is the only construction material whose greater use will provide climate change mitigation. If we use less wood, we use more steel and concrete – materials which are responsible for two thirds of the Worlds industrial carbon emissions.

We believe that The Environment (Wales) Act and the Well-being of Future Generations Act are ground breaking pieces of legislation that could have a profound impact on the development of Wales in general and the Welsh forest sector in particular, and are therefore worthy of strong support from industry

However, to date these acts have not been well communicated to the private sector. If this continues, there is a risk that they will simply be perceived as Government talking to itself with little relevance to those outside the public service bubble. If the private sector is not bought on-side, then confusion or ambivalence may turn to cynicism and active attempts to undermine the legislation. Currently there is too much focus on process and not enough on meaningful outcomes.

**Ever increasing demand for timber and wood products, the climate change benefits of forestry and wood products when combined with the probable withdrawal from the Common Agricultural Policy (CAP), as a consequence of Brexit, presents a once in a generation opportunity to implement a radical industrial strategy for our forest industries. The Natural Resources Policy should support this ambition.**

### [Specific Comments on Priority Themes](#)

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#### Key WKW recommendations

##### **Industrial strategy for wood**

WG should support the creation of an Industrial strategy for wood to drive sustainability and growth in the Welsh forest industries sector. Governments of all political persuasions now recognise that the laissez-faire approach to industry does not deliver long term strategic value. A new value-adding relationship between forestry and industry is required. Wood is the favored material for modern high performance, durable, systemized and offsite housing throughout the world. We should have a forest planting and management strategy that maximizes the potential for local manufacturing and for the use of homegrown timber.

##### **New management and ownership models for the WGWE**

WG should reflect on the lack of leadership in the forest sector in Wales and act by exploring different ownership and management models for the WGWE. There is clear

potential to attract institutional investors. There is an opportunity to involve local authorities in woodland expansion and management. The lack of commercial tree planting seriously undermines WG aspiration for Green Growth. Following the cascade use principal would support management approaches that deliver structural timber for construction and liberate additional woody biomass for other markets such as renewable energy

### **Embodied carbon assessment**

A focus upon embodied carbon is an effective way to drive resource efficiency in construction. As a first step, embodied carbon assessments should become mandatory for all public projects. This would lead to increased specification and use of timber and local timber products, and enable increase in the biogenic carbon store in the built environment (a recognized climate change mitigation opportunity). Embodied Carbon should initially be part of the planning process but over time could be brought into the Welsh Building Regulations

### **The carbon store in the built environment**

The final Climate Change Commission report following the Paris agreement recognized and quantified the climate change mitigation benefit of increasing the use of wood in construction. Because of this, it is clear the IPCC methodology for quantifying the size of the carbon store from harvested wood products should now be adopted and policies and strategies should then be developed with the purpose of increasing the size of the store.

### **Public Procurement**

Public procurement should recognize the benefits of local industries, from wood production, through processing to delivery of wood based buildings and fuels. This support could be advanced by supporting the development of 'Wood Encouragement Policies' throughout local government following the leadership shown by Powys county Council

**Consultation  
Response  
Form**

Your name: Roger Cooper

Organisation (if applicable): Woodland Strategy Advisory Panel

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Your address:

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**Response to consultation on the development of a National Resources Policy.  
Woodland Strategy Advisory Panel. (WSAP)**

**Main message**

Trees, woodlands and forests must be at the core of the Natural Resources Policy. They require a much greater emphasis than this consultation and other NRW/WG documents on the NNRP currently give. This lack of focus is a matter of serious concern to panel members given the many present and potential benefits woodlands and trees provide. These are shown very clearly in the State of Natural Resources report. (SoNaRR see table 8.1).

**General comments**

We draw attention to the following overarching matters relevant to the three themes of the consultation.

1. A woodland policy must be for the long term (i.e. growing trees is a long term business). This is recognised in “Woodlands for Wales” (WfW), the WG’s 50 year strategy. However this inherent long term view is not carried through to financial affairs and budget planning. The panel perceived a distinct disconnect between the strategy and budget planning. There is also a gap between policy ambition and short term drivers which may lead to difficulty substantiating the WBFG Act.
2. Short term thinking of governments often overlook the need for stable long term strategies for forestry. Therefore each successive minister must be immediately and suitably briefed on this aspect.
3. The panel recognises that Brexit increases the uncertainties for natural resource planning and that the European Transition will probably exacerbate this, but we believe the disconnect between long term forestry planning and shorter term financial planning should be addressed now and not delayed by the European Transition.
4. Public sector accountability. We consider that there is often insufficient accountability for failure in the delivery of policy objectives. For example: who is accountable for any failures to implement the WfW strategy or to achieve woodland creation targets? We think it is important that the public understands where accountability lies and any sanctions for failure of WG and NRW to deliver.

**Theme 1.**

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

**General comments on theme**

**Green growth definition.** The title of this theme is not clear. Are there three (related?) topics: (a) accelerating green growth by increasing resource efficiency; (b) renewable energy; (c) supporting innovation? Or one aim (accelerating green growth) to be achieved by (a) increasing resource efficiency, (b) increasing use of renewable energy, and (c) supporting innovation?

**Resource efficiency.** The wording of the consultation places emphasis on achieving green growth through “resource efficiency”. It needs to be recognised that current land use is sub-optimal and if forestry is to expand there is a need for land use change.

**Circular economy and resource efficiency.** Wood products are an exemplar of the circular economy. All parts of a harvested tree are utilised and a very high use is made of recycled wood and paper for fuel, paper manufacture and reconstituted wood products. The recent growth of the wood fuel market has strengthened the circular wood economy as it has created better value via fuel wood/chip sales for the lowest quality timber and an outlet for formerly unusable “waste” wood.

**Reducing the demand for virgin materials.** We are concerned about the suggestion that the policy should be to “reduce demand for virgin materials” and in the context of forestry we disagree with this aim. In many respects, being more sustainable relies on substituting fossil derived materials by natural ones to reduce the impact on the climate. We need to have strong processes to ensure that natural materials like wood are obtained from sustainably managed resources. The forestry industry in the UK has a long history of sustainable management, and is now recognised by WWF etc. as an exemplar of provision of sustainable raw materials. It would be perverse to reduce demand for sustainable raw materials like wood (a virgin material) by substituting fossil fuel derived materials which have a higher impact on the climate.

Actions required for delivery of green growth related to woodlands	Barriers/threats to actions
Increase woodland creation. Current trends are well below government targets. The WG cooperative forest planning scheme is a useful initiative.	Regulations Glastir Woodland creation mapping criteria Land prices
Recognition of the need for land use change if greater woodland cover is to occur	CAP payments. Under Glastir or its Brexit successor farmers should have or plan to have a percentage of woodland on their farms, on a sliding scale according to area held before they can qualify for <b>any</b> grants from that scheme.
Intensify management of small privately owned woodlands especially on farms	Discontinuation of Glastir woodland management. BWW was better in this respect.
Support for R&D for added value wood based products	Loss of RDP programmes beyond 2020
Continued support for forestry research	Loss of EU research funding post Brexit. This would be especially serious for countering tree diseases.
Continued vigilance over tree diseases	Loss of European cooperation post Brexit but possibly compensated by being able to protect our borders better from imported pests and diseases
Encourage the hierarchy of use of wood e.g.as with the current NRW roadside sales policies.	Ensure RHI payments and other incentives do not distort the market and induce wasteful heat generation. Incentives need to be carefully monitored for perverse outcomes both in terms of energy production, impact on supply chains (especially sustainability of supplies) and equity in the market place. Incentives should expand markets not distort them.
Stimulate the use of timber products for non-timber materials e.g. concrete, plastics, steel. "Timber first" for public procurement. Encourage roll out of Powys CC wood build decision to all counties.	Building regulations Conservatism of architects and planning/building inspectorate
Ensure swift action is taken to mitigate against the forecast decline in timber supplies	Restocking backlog by NRW, 5,000ha is the equivalent of 3 years NRW timber supply to market. Lack of woodland creation.
Monitoring of sustainability of fuel wood to UK markets	Poor knowledge of supply chains and sustainability of imported fuel wood plus the risk of importing pests and disease on imported stock.
Ensure Brexit settlement does not impair growth of the Welsh forestry and timber sector	Possible threats include: higher tariffs on imported wood products which will discourage increased use of wood products; (Wales will continue to be import dependent for the foreseeable future); weaker control of timber pests and diseases; loss of RDP benefits. As UK is the world's 3 <sup>rd</sup> largest importer of timber, Brexit and a weak pound could benefit home grown timber against imports and even if the UK economy shrinks and uses less wood the opportunity to gain market share remains

## Theme 2.

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

#### General comments on theme

**Nature based solutions.** Trees, woodlands and forests already contribute in a major way to the following nature based solutions mentioned in the document:

- green infrastructure in and around urban areas,
- better soil management for carbon storage
- natural flood management
- carbon sequestration and storage

They also bring a wide range of other nature based solutions to current problems which are explained in SoNaRR

**Brexit considerations.** There is a risk of potentially segregating 'nature' from agriculture, forestry and rural businesses in Brexit negotiations. If the NRP is to succeed, joint working will be vital.

Although proposals for governance structures are still being developed, the UK will need a framework to engage with the World Trade Organisation (WTO). It is unclear what barriers this may present but as trade is not devolved the governance will sit at a UK level. Forestry is not covered by the Agricultural Agreement, and is instead part of General Trade.

If incentives are considered 'environmental' there is greater flexibility but countervailing tariffs could be imposed if held under a General Trade banner. For example, restocking grants are seen as grants to trade, not as environmental efforts.

Actions required for delivery of nature based solutions to improve resilience and benefits derived from natural resources	Barriers/threats to actions
Increase woodland cover so Wales benefits more from the multiple benefits of woodlands	Regulations Glastir Woodland creation mapping criteria Short term thinking and planning
Greater use of trees and green infrastructure in urban areas for surface water management, shade, air quality, amenity, recreation, health and wellbeing. All boroughs should have a tree/woods audit like Wrexham.	Maintenance costs to LAs. Regulators and developers not understanding the benefits of green infrastructure. Cultural resistance. Skills shortage.
Ensure the use and protection of trees is an integral part of the planning process for major developments.	Weak regulations; lack of awareness of benefits by planners and developers
Continue to work with Dwr Cymru on use of trees and woodlands in catchment management.	

## Theme 3.

### Improving community and individual wellbeing by taking a place and landscape based approach.

#### General comments on theme

**Definitions.** It's not always clear how the topics covered in the last paragraph (ecological networks, connectivity and resilience) contribute to "*Improving community and individual wellbeing*". It's possible that the theme's title refers not just to human communities and individuals but also to all animals and plants; if so this needs to be clarified.



**Scale of approach.** Our discussions were hampered by a lack of clarity of what is meant by a “landscape based approach”. This is not defined in the document. It is important to recognise with respect to trees, woodlands and forests that different scales of thinking and actions will depend entirely on the matters under consideration and who the owners are and what their objectives might be. Some issues will be very place related e.g. where to locate urban street trees, some e.g. use of trees for flood control should probably be considered at a catchment level, some e.g. future timber supplies from Welsh woodlands will need an all-Wales perspective while some will need to be considered in a UK and global perspective e.g. tree health. It is essential that planning and actions are not constrained by artificial boundaries.

**Forest ownership.** It is important to remember that Wales’s forests are privately owned assets in the main, (around 2/3 of woodland area is private 1/3 is public) – so willing participation by the owners of these assets is key. The asset owners are for the most part local people (there is limited absentee ownership) and this will also apply to new forest areas.

Actions required for improving community and individual well being	Barriers/threats to actions
Mainstream community woodlands into the sector and provide support so they have access to experience and skills. Community Woodland staff are often expected to produce their own management plans and be up to the same standards as industry. RDP schemes, such as Farming Connect may be able to support these efforts.	The most common barrier to actions by community woodlands is their status. Charity and informal groups struggle to engage with Government systems. Community capacity is sometimes overwhelmed by pressures to meet Government objectives. Community woodland management is only as good as the people involved and succession planning is most important.
Progress with developing payments for ecosystems services (PES). There are proposals for subsidies go out as Natural Resources Management payments, rather than farming subsidies. This would include many land uses which are currently excluded from access to funding (e.g. land with scree).	Funding difficulties Difficulties in defining who should be the beneficiaries and in quantifying benefits.
Related to the above there is also a need to be able to quantify community and well-being benefits from woodlands to properly evaluate investments in delivery of social/cultural services. This should include benefits of timber procurement/sales decisions in line with the aspirations of the WFGA.	ditto
Clarity of post RDP Farming Connect type support for forestry. Businesses will continue to need this advice and support.	Serious shortage in Farming Connect of people with forestry knowledge.
The greatest contribution to individual wellbeing is gainful employment which in turn helps maintain rural communities and the services they depend upon for quality of life	Reduction in area of productive woodland capable of providing employment. The forestry sector is able to provide higher levels of economic activity than subsidised sheep farming

## Related issues

### Area statements

The panel also discussed the forthcoming area statements as we understand these will be central to delivery of the NRP. Several members of the panel have been involved with NRW meetings on area statements. Our comments are as follows:

1. Area statements may provide the key to prioritise effort, but the consultation does not detail who should make the decisions, what sort of governance mechanisms will be in place and what powers decision makers will have. We have yet to see any real indication of how area statements will work in practice, who contributes, and who runs them. This information is crucial if the private sector is to engage.
2. There is a real concern that the NRP and the Area Statements are likely to be too high level to be of practical use to land owners. It is important that there is a bottom-up approach to the integration of local benefits within a landscape framework on the Area statements.
3. It is not enough to term the documents as 'statements'; if the Area Statements need to be implemented; they should be termed as strategies.
4. SoNaRR contains details of the tools that NRW will be using to develop Area Statements, but it's not clear how or at what stage stakeholders will be involved in the process. Will they simply be asked to comment on draft statements, or will there be an opportunity to engage at an earlier stage?
5. As most rural land is owned by the private and third sectors their active engagement in formulating area plans is crucial. So far this has been seriously lacking. It must be appreciated that most land owners are heavily involved in the day to day work load of their rural business which they run with often limited resources. The forest industry has one manager (CONFOR manager) overseeing all aspects of this type of proposal, on behalf of members. Overload would not adequately describe the current avalanche of new proposals for the rural sector.

Roger Cooper  
Chair WSAP

## Consultation Response Form

Your name: **Professor John Healey**

Organisation (if applicable): **Bangor University (Director of Research,  
College of Natural Sciences)**

email / telephone number: [j.healey@bangor.ac.uk](mailto:j.healey@bangor.ac.uk) / 01248 383703

Your address: **College of Natural Sciences, Bangor University, Bangor,  
Gwynedd, LL57 2UW**

**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.

There is much to be welcomed in this document. It is well-informed and advocates many of the policies that I agree with. I focus my response on two issues:

### **1. The challenges of the inadequate existing evidence base to inform successful delivery**

While the document does acknowledge the challenges inherent in implementation of this policy, there is still a risk that they are underestimated. Delivery will require the informed and participatory assessment of a long-list of crucial issues. While this may identify some welcome “win-win” solutions, in most cases there will be inevitable **ecosystem-service trade-offs** to be assessed in terms of whether the benefit for delivery of one ecosystem service outweighs the cost to the delivery of others.

The recent enactment of important new policies in Wales for sustainability, future generations etc. should lead to a transformation in the timescale of decision making, sweeping away **the**

**problem of short-termism** that could be identified in some past government practice (the need to make rapid decisions leading civil servants to cast around desperately for what evidence is immediately available). This needs to be replaced by a reliable process to identify longer-term evidence needs, enabling budgets to be ear-marked for a rigorous analysis of the current state of evidence in these areas, and for new research to be commissioned to fill any crucial gaps that are identified. We need a more formal process to identify “where are the most important holes”.

The “area-based approach” within the policy will be one important component of meeting this challenge, and should help to focus assessment at a scale appropriate for successful participation by multiple stakeholders. However, making these assessments wholly independently area-by-area will not be efficient, and there will be a pressing need for larger scale analysis.

There seems to be a risk of naivety in the document that: (a) State of Natural Resources reporting (and associated monitoring activity), in combination with (b) existing expertise in NRW, together with (c) external “expert opinion” (or subjective low-quality review work) commissioned on an “as needed” basis, will together provide the evidence needed to deliver the policy.

In fact, this approach seems to omit crucial additional components that will be vital for success:

(i) **Systematic collection, review and analysis of the best-available relevant evidence world-wide about “what works”** – to ensure that Wales truly does learn from the experience gained elsewhere, rather than simply carry out its own process of “trial and error”. For example, I have direct personal knowledge of very important analysis done in the Republic of Ireland of its experience with implementation of farm woodland policy that does not seem to be taken into consideration in parallel work in Wales. In this light it is welcome to see that the Welsh Government has entered a new phase of collaboration with the Economic and Social Research Council to set up a Wales Centre for Public Policy, including the establishment of “What Works Wales” ([http://www.esrc.ac.uk/funding/funding-opportunities/centre-for-public-policy-for-wales/?utm\\_medium=email&utm\\_source=govdelivery](http://www.esrc.ac.uk/funding/funding-opportunities/centre-for-public-policy-for-wales/?utm_medium=email&utm_source=govdelivery)). Therefore, I very much hope that this same approach will also be implemented in the natural resources policy development and delivery sections of the Welsh Government, with close links established with “What Works Wales”.

(ii) A very important by-product of such systematic review work is to identify, objectively, the most important gaps in the existing base of reliable evidence on “what works”. It is likely that the number and size of these gaps will come as a surprise to many in Welsh Government/ NRW. It is possible that a past over-reliance on subjective “expert opinion” has rather “papered over the cracks” in terms of the reliable evidence base. A proper appraisal of the gaps in existing evidence, and thus the importance of highly targeted new research to fill the most important gaps, is likely to pose significant budgetary challenges for the Welsh Government. However, I still advocate strongly that this analysis of the evidence base should be carried out so that those making decisions on policy delivery are truly informed about the state of the evidence that they are using as its basis.

(iii) Advanced analysis and modelling of the State of Natural Resources (and associated monitoring data). The Welsh Government’s commitment to the regular State of Natural

Resources reporting, and the work that has been put into the development of key headline indicators for the 2016 report, are very welcome. Many of these are probably very appropriate for the needs of those making higher-level policy decisions and tracking Wales's progress at a national level in meeting policy objectives. However, it is important to stress that this level of assessment will be of limited use for decision-making in policy delivery. The Welsh Government policy in this area places important emphasis on "adaptability" as a component of the "resilience" of managed ecosystems. However, for "**adaptive management**" to be implemented successfully (especially at the range of scales up to landscape and catchment emphasized in the policy) will require advanced analysis of monitoring data collected at the appropriate scale. Application of "internet-of-things", earth observation and eDNA technologies to environmental monitoring, together with new approaches to implementing "citizen science" and the development of new high level modelling approaches mean that we are on the cusp of a huge advance in capacity in this area (as identified in the WG Natural Resources Monitoring Framework Future Options project). However, a major task of research-and-development work remains in order to achieve it.

(iv) There is also a major potential problem of the over-use of the term "**resilience**" in Welsh Government policy in this area. This term is extremely ambiguous (with multiple definitions that mean different things to different people) and this is likely to be a major barrier to achieving unambiguous assessment of progress. This greatly increases the risks that the policy progress will fail to meet societal objectives. It is important that on-going review of State of Natural Resources monitoring in Wales is informed by comparison with best practice in other countries of how to assess quantitatively the success of implementation of individual policies. E.g. an international example of good practice is the definition of measurable targets in Aichi Target 5 (UN 2010): 'By 2020, the rate of loss of all natural habitats, including forests, is (to be) at least halved and where feasible brought close to zero'. Definition of targets and linked monitoring needs to be informed by ecological understanding of the multidimensional complexity of natural responses to environmental change.

A major asset for Wales is the high level of expertise relevant to meeting these three needs that is available in **Welsh Higher Education and research organizations** (including, for example, the College of Natural Sciences in Bangor University and the Centre for Ecology and Hydrology). We would be extremely pleased to work closely with the Welsh Government/NRW to achieve this. However, it will be important for WG/NRW not to underestimate the scale of work that this will involve, and the level of resources that it will require to be delivered. At present there does not seem to be a common understanding of this amongst the parties involved in the planning for the "Joint Wales HE - NRW Research and Evidence Platform".

## **2. Tree and woodland cover and function**

One of the existing Welsh Government natural resources policies that is proving most challenging is the target for the expansion of woodland cover (which in itself is rather modest by international and European standards). The most recent Woodlands for Wales Indicators report shows just the current seriousness of this policy delivery failure. There is a strong need for new analysis to better understand why this has occurred. It may be the case that this is because the policy has not been underpinned by sufficient **analysis of the trade-offs between delivery of ecosystem services (and biodiversity) associated with woodland**

**and those associated with other forms of land use/land cover.** There seems to be a significant risk that policy development in Wales in this area is lagging behind the work of the **UK Treasury's Natural Capital Committee**. There is a clear need for WG to ensure that:

(i) The Woodlands for Wales policy is more strongly based on **rigorous economic analysis**.

(ii) Better evidence and analysis is obtained on the functioning of different forms of tree and woodland cover and thus their **actual delivery of different ecosystem services** (such as flood risk mitigation).

(iii) A **rigorous life cycle assessment** approach is taken to evaluate alternative forms of woodland establishment, structure/composition and management, through the full forest growth and product life cycles, in terms of their delivery of different ecosystem services (such as through carbon sequestration).

(iv) A further layer of analysis is added, specifically, to the WG Natural Resources policy document's reference to the **important relationship between diversity and ecosystem resilience**. While this relationship is important, it is also complex, and much work is needed to better understand its implications for identification of how WG policy should favour different forms of woodland composition, structure and management in different contexts.

(v) A further layer of analysis is added, specifically, on the issue of **spatial scale and location of woodlands**, to assess how these influence their benefits and costs for the delivery of the range of ecosystem services.

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

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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13 February 2017

e-mail response sent to: [NaturalResourceManagement@wales.gsi.gov.uk](mailto:NaturalResourceManagement@wales.gsi.gov.uk)

Dear Sir/Madam,

**Response to: Consultation to Inform the Development of the Natural Resources Policy**

The Royal Town Planning Institute (RTPI) is the largest professional institute for planners in Europe, representing some 23,000 spatial planners. RTPI Cymru represents the RTPI in Wales, with 1,100 members. The Institute seeks to advance the science and art of spatial planning for the benefit of the public. As well as promoting spatial planning, the RTPI develops and shapes policy affecting the built environment, works to raise professional standards and supports members through continuous education, training and development.

The response has been formed drawing on the expertise of the RTPI Cymru Policy and Research Forum which includes a cross section of planning practitioners from the private and public sectors and academia from across Wales.

RTPI Cymru welcomes this consultation, to inform the development of the Natural Resources Policy. We note that feedback is requested on the priority themes and key objectives within them. While the priority themes are clear, the key objectives are far from explicit. We believe this will make it difficult to develop the Natural Resources Policy, and ultimately to monitor the effectiveness of its implementation.

The consultation document indicates that the Natural Resources Policy will set out the key priorities for responding to climate change. The UK Climate Change Risk Assessment for 2017 - Summary for Wales, makes salutary reading in this context. "The latest set of projected changes in climate for Wales comes from the 2009 UK Climate Projections. Under a medium emissions scenario, regional summer mean temperatures are projected to increase by between 0.9 – 4.5°C by the 2050s compared to a 1961-1990 baseline. Regional winter precipitation totals are projected to vary between -2 - to +31% for the same scenario. The average sea level for Cardiff is expected to increase by between 22.8 cm and 37.6 cm by 2090 compared to a 1990 baseline."

The consultation document refers to the legal requirement of Government to reduce greenhouse gas emissions by at least 80% by 2050 (page 14). Decarbonising the economy and our society while increasing resilience to climate change would therefore be a compelling theme for the Natural Resources Policy.

A key issue to be addressed by the Natural Resource Policy should be the skills and resources to put the policy into effect. Capacity building will need to be a key priority.

It is pleasing to note that the document stresses the importance of interfaces between the Environment (Wales) Act and the Planning (Wales) Act, however it is disappointing then that

the document does not set out the role of the planning system in helping to progress the three priority themes (page 11). As an example, the document might refer to the role of Technical Advice Note (TAN) 15 on Development and Flood Risk. This TAN has not been updated since 2004 and thinking on flood risk management has moved on considerably. We therefore welcome the work underway to update the TAN and recommend that this should remain a priority.

RTPI Cymru believes there is an inadequate focus in the document on the importance of agriculture in protecting, enhancing and benefiting from the natural resources of Wales (agricultural land quality, climate, rainfall). While there are some references, agriculture should be more strongly emphasised as a generator of 'green' growth alongside energy, tourism, its contribution to food security, the economic health of rural communities and social benefits from thriving rural populations.

When it comes to the use of nature-based solutions to improve resilience to climate change, one of the key tools that needs to be considered is the redesign of Government financial support for the farming industry, particularly in terms of flood risk management. The document recognises the role of sustainable drainage (SuDS) in improving resilience. There are concerns that maintenance, monitoring and enforcement relating to SuDS are inadequately resourced, and this ought to be reflected in the Natural Resources Policy.

Protecting a high quality environment and natural resources must go hand in hand with economic success. These factors should not be viewed as reasons for accepting poor economic performance which has put large areas, especially of rural West Wales at the bottom of European economic tables.

The future policy also needs to recognise that many of the growing pressures on natural resources in Wales will come from outside. The population of Wales is slowly growing but the much more rapid growth in parts of England is likely to be felt across the boundary. For example demand for rural recreation from growing English cities, demand for rural escape homes, pressure for commuting homes and possibly more demand for water supplies and energy. Some of these external pressures will bring opportunities such as tourism, other business investment - such as the Northern Powerhouse in North Wales, but other pressures may be less welcome and need effective control.

Planning policies developed by the Welsh Government and through Local Development Plans (LDPs) are essential to secure appropriate and positive responses to the local and external pressures on natural resources, and to rural development. Planning policy on housing land supply should be kept up to date to balance fully the range of pressures with the need to protect natural resources and the well-being of communities. Policies must also address the changing demands for rural developments, including opportunities for agriculture, tourism, businesses, small scale energy, appropriate housing etc, and effective controls to limit unsuitable development.

A review of current planning guidance for rural development could be carried out in parallel to developing a policy on natural resources to ensure a positive and consistent approach. Such a review would also be timely in view of the growing Welsh Government responsibilities for small and medium scale energy, and for water, and the implications of the UK leaving the European Union for agriculture and natural resources. A review is required to ensure that all development in rural areas aims for sustainability and economic viability. As part of this review the detail of policy on low impact 'one planet' development should be assessed to ensure that such schemes also meet the need for real financial viability as well as environmental considerations, and meeting other policy aims such as protection of the Welsh language.

The community impact of natural resources and the link with wellbeing should be a clear theme. This links with the Natural Resources Policy challenges (page 11) of:

- Improving health and equity through access to good quality green and blue spaces



- Improving the quality and connectivity of our habitats
- Retaining the distinctiveness of our places and historic landscapes

The connectivity of green infrastructure has an important role to play with increasing pressure to meet housing demand. The importance of retaining local natural resources should be acknowledged. Such areas provide for green corridors to assist the active travel agenda, provide opportunities for community action and ultimately have a positive impact on mental and physical health.

The document recognises "improving community and individual well-being by taking a place and landscape based approach" as one of its key themes. The Natural Resources Policy could helpfully refer to the role of Place Plans delivered through the planning system as a key tool for facilitating this.

The document refers to the role of green energy in developing a sustainable economy, but it is surprising there is no reference to energy conservation. A pro-active policy to rapidly improve the energy conservation performance of Wales's building stock could make a major contribution in reducing greenhouse gas emissions, while also helping to tackle fuel poverty.

The Committee on Climate Change has drawn attention to the inadequacy of government policies in reducing carbon emissions from transport. This ought to be a priority for the Welsh Government's climate change agenda.

If you require further assistance, please contact RTPI Cymru on 029 2047 3923 or e-mail Roisin Willmott at [walespolicy@rtpi.org.uk](mailto:walespolicy@rtpi.org.uk)

Yours sincerely,



Dr Roisin Willmott FRTPI

**Director**  
**RTPI Cymru**

Committed to environmental protection and the sustainable development of socio-economic benefits through the use of natural resources

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# **RESPONSE TO CONSULTATION TO DEVELOP THE** **NATURAL RESOURCES POLICY FOR WALES**

***“If you really think the environment is less important than the economy,  
try holding your breath while you are counting your money”*** Dr Guy McPherson

## INTRODUCTION

In recent years, the Welsh Government has produced a wide range of legislative and other measures together with review and discussion papers and reports relating to the management and use of the Principality's natural resources for which it is to be commended. In particular, the following initiatives are worthy of note: - The Well-being of Future Generations (Wales) Act 2015; the State of Natural Resources Report 2016; Environment Wales Act 2016. These initiatives provide evidence of the Welsh Government's public recognition of the crucial importance of these resources to the present and future well-being and sustainability of the country's communities, prosperity, culture and environment. They also rightly highlight the very real dangers of failing to implement robust and timely measures to safeguard, enhance and monitor the state of the natural resources in the face of threats such as climate change, environmental degradation and other man-made changes and pressures.

However, words are easily set down and bandied around, and that is all that we have to date. It is the next step that will be crucial. Whilst these measures collectively provide a valuable and positive framework for the future, as they stand they lack any 'flesh on the bones', being expressions of philosophy and generality rather than definitive proposals with any detail as to how the necessary goals might be achieved. What are required now are 'SMART' and definitive time and outcome based actions backed up by robust and extensive monitoring and adequate financial and manpower resources to drive the necessary programmes forward.

The first test of the Welsh Government's resolve to really get to grips with the many issues currently facing the Welsh environment and its natural resources will be the decision it takes on the future implementation of the Nitrates Directive following the recent Review consultation. The high frequency of agricultural pollution incidents and the high number of rivers and streams that are now

fishless or with significantly depleted fish stocks is an indictment on current efforts and policies and demonstrates the urgent need for robust Wales – wide regulation. A failure to implement Option 2 of the Review whereby the whole of Wales is designated a Nitrate Vulnerable Zone for the purposes of the Directive will be a clear demonstration that the Welsh Government is not serious in its intent to adequately protect and improve the Welsh environment and its natural resources.

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## **WHAT MUST CHANGE IF THE FUTURE NATURAL RESOURCES POLICY IS TO BE EFFECTIVE**

Welsh Government's '***Natural Resources Policy Statement***' includes the following important and true statements, which I fully endorse.

***'Healthy, resilient ecosystems underpin our economy, health and well-being and are an important part of our culture. They provide us with our food, clean water and air, the raw materials and energy for our industries and protect us against hazards, such as flooding and climate change.'***

***'The objective of the sustainable management of natural resources is to maintain and enhance the resilience of ecosystems and the benefits they provide and, in so doing, meet the needs of present generations of people without compromising the ability of future generations to meet their needs.'***

However, as things are, I have **no** confidence that this stated objective will be met as I believe that there are a number of fundamental obstructions to progress in Wales. If there is to be real change and improvement to ensure that healthy and resilient ecosystems will be restored and maintained, the Welsh Government will need to implement some radical changes to its philosophies and practices. The changes that I believe need to take place are given below.

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## **CHANGES REQUIRED FOR A WELSH NATURAL RESOURCES POLICY TO STAND ANY CHANCE OF BEING EFFECTIVE**

- 1. The influential people of Wales and their Government need to lose their complacency about the state of the Welsh rural environment and its ecosystems and instead place its monitoring and improvement high on the list of priorities and exhibit much greater urgency and resolve.**

In general, despite contrary suggestions from Government and others the Welsh ecosystem is in a poor state compared with both its historic status and its potentially healthy and rich condition if it were subject to sensitive and informed management instead of the current damaging regime. Those with longer memories will remember the times of high bio-diversity and habitat richness before the widespread land drainage schemes in the '60s and '70s and the growth of intensive agriculture fuelled by the Common Agriculture Policy. This piece of European legislation has done more to damage the health of the rural environment in Wales and elsewhere in Europe than any other measure since the height of the industrial revolution. Indeed, its impact on the environment has arguably been more widespread and insidious than even the growth of mining and industrialisation.

Despite the overwhelming evidence to the contrary, the Welsh Government, the farming industry and its representatives, and even tourist organisations, continually make erroneous statements along the lines that 'Farmers are the custodians of the countryside', 'Agriculture creates the treasured landscapes that attract people to Wales' and 'We must protect farmers in order to protect the environment'. Nothing could be further than the truth! Drainage schemes to 'improve' land for agriculture have drained wetlands and uplands over the last 50 years, creating flooding problems downstream, land and habitat loss, siltation in the lower reaches and loss of fish stocks and other riverine life. Intensification of agriculture and the resultant over-cropping and over-stocking of the land, the development of larger units, and the need for bigger and heavier machinery has led to the degradation of soils and habitats and a drastic loss of bio-diversity. It has also necessitated the increased use of nitrate and phosphate fertilisers and pesticides in order to maintain and increase productivity to the detriment of natural ecosystems.

The NRW, under the heading 'Managing our Waters' in its own publication 'Public Service Board – Pembrokeshire Environmental information for well-being assessments' states that ***“There are 39 priority water bodies in Pembrokeshire, that have been identified as failing to meet "Good Ecological Status" under the Water Framework Directive. Agriculture is one of the main sources of water pollution.....”*** . This is a sad reflection on the current status of the Welsh environment and needs to be addressed urgently and robustly rather than being swept under the carpet or put on the back burner.

As a result of current and past agricultural practices, 80% of Pembrokeshire's rural environment, which coincides with the area utilised by intensive agricultural practices, suffers from the lowest levels of bio-diversity with little or no natural ecosystem value whatsoever aside from its artificially maintained agricultural productivity. Agricultural holdings comprise 87% of the land area of Wales and therefore this situation of low biodiversity is mirrored across the majority of the country, even the uplands where overgrazing by sheep and deforestation has created a virtual desert of *Molinia* monoculture instead of the rich and diverse habitat that used

to be there. It should be inconceivable for 80% of a country's rural areas to be the subject of major degradation as a result of the activity's of a single industry, as if it were to occur elsewhere, there would be public outrage, and the Government, if it is not a corrupt one, would never allow it to happen. However, that is what has happened in Wales. This puts it on a par with a number of far eastern countries where the destruction of habitat to create oil palm plantations is widespread and has the support of members of their Governments with a vested interest, a practice that is widely condemned in the West.

I recognise that there are some Welsh farmers who operate, or try to operate, in an environmentally sensitive way. Such farmers tend to have smaller agricultural units with lower stocking levels, produce a wide range of products, add value through processing, sell to local markets and maintain the land in good heart through natural processes. However, the great majority of farmers, encouraged by the Government and farming unions, attempt to maintain their operations in the same old ineffective, environmentally damaging and short term vision ways, putting increased productivity above environmental protection. This is a future disaster waiting to happen.

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## **2. The Welsh Government needs to get out of the pockets of big business, listen to the ordinary people and take a stand for the real long term needs of the country**

Whilst I recognise the importance of ensuring that Wales has a robust and thriving economic and business base, it is equally important that this is balanced against the needs of the environment and the sustainability of the natural resources. A failure to ensure that the Welsh environment is in good heart will place the economic / business world in jeopardy in the future as well as reducing the overall well - being of communities. At present, it is clear that the Welsh Government is influenced too much by the unilateral, biased and short termism views of big businesses and big landowners for it to take the necessary robust and courageous steps required.

As an example, two Assembly Members, Paul Davies and Angela Burns, recently made public statements that the proposed Welsh Government Nitrate Vulnerable Zone Review proposals were 'unnecessary and draconian'. Instead they stated that they supported the NFU Cymru position that all regulation should be removed and the management of farm waste should be left under the voluntary control of farmers themselves. As this voluntary approach has demonstrably and dramatically failed over the years as is evidenced by the high level of agricultural pollution events and the impoverished fish and other aquatic fauna stocks in many Welsh rivers and streams, the statements made by these two politicians can only mean that they do not accept that there is a problem or their support is solely for the farmer rather than the environment, or both. With views like this being expressed by those who represent the

ordinary people of Wales, views unopposed by other Assembly members, what hope is there that the necessary urgent and decisive action will be taken to reverse the decline in the Welsh environment?

Many concerned individuals are suggesting that the merger of the CCW, EA and FC and the subsequent setting up and management of the NRW was part of an intentional strategy of the Welsh Government to water down the effectiveness and regulatory power of the previous organisations so that the big economic interests could have freer rein to develop their own short term goals and ride roughshod over the environment. Whether that was the intention or not, this would fit with the views expressed by the two AM's above and reflects the reality of what is happening on the ground. What is certain is that the current regulatory system in Wales is working in favour of the short term interests of big business and against the environment.

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### **3. Natural Resources Wales needs to have a major increase in its funding and resources and a major shake up in its management, its methods of operation and its rationale.**

If it is to be the means by which Welsh Government environmental / natural resources policy is to be implemented, then the NRW will need to change radically in the level of funding it receives, its staffing levels, its management and its operational rationale. Unless this happens, the proposed Natural Resources Policy will either be still born, or its progress will be so slow and piecemeal that it will be pointless and quickly redundant.

Since its inception, Natural Resources Wales has been, and continues to be, widely recognised as a disaster, earning itself the epithet **Not Really Working!** Compared with the days in the 80's and 90's when I was employed as a Fisheries and Conservation Manager in the National Rivers Authority, the staffing levels are now skeletal and entirely inadequate to do the job required. From my dealings with the NRW and from talking to others, it would appear that staff with valuable long-term experience and knowledge have either left the organisation in frustration or disillusionment or have been let go or moved into different responsibilities where their skills have little relevance. Morale within the organisation is at an all-time low, as is the level of service experienced by the public. There is also a strong perception that senior management personnel have been selected for their business rather than their environmental leanings and that economic considerations are being placed ahead of environmental concerns (e.g. the recent felling operations carried out for economic reasons in Canaston Woods, Pembrokeshire, without necessary environmental appraisal and against the advice of conservationists).

It is widely believed amongst the general public that NRW staff are bound by an in-house policy not to respond to reported pollution or poaching incidents unless certain criteria are met and unless the report comes through official NRW channels. It is clear from my own experience and the experience of others that I know that many incidents either go un-investigated or are inadequately dealt with. The interface between NRW staff and the general public is poor and actively discouraged by the organisation, and the availability of information regarding the organisation is also poor and appears to be shielded by a cloak of secrecy. NRW staff are actively discouraged if not actually prevented from discussing their work or the work of the organisation in any detail with members of the public, and the level of distrust that has built up is regrettable and damaging.

Some concerned people are suggesting that it was the intention of the Government to establish and fund the organisation in such a way that it was bound to fail so that greater reliance was placed on the voluntary / charity sectors to make up the leeway thereby reducing the financial and regulatory responsibilities of Government. This view certainly seems to have some credence if one considers the way that the voluntary Rivers Trust movement in Wales is having to make up for the declining ability of the NRW to adequately monitor, manage and improve the freshwater environments and fisheries in Wales, a role that the Trust's are finding increasingly difficult to maintain in the face of declining grant and other funding.

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#### **4. An entirely new business philosophy needs to be adopted by those businesses that use Wales' natural resources and those who manage them.**

The principal industry that utilises and depends on the Welsh terrestrial environment is agriculture, an industry that depends almost entirely on subsidies for its survival and is always pleading poverty as a result of current market forces. This economic situation has resulted from farmers getting insufficient returns on their products to meet their costs, a situation which in any other industry would either require the industry to find new markets, develop new products and / or reduce their production costs. Failure to do so would lead to the closure of the industry. Uniquely, in the case of the agricultural industry, the economic survival of the industry is maintained on farms through receiving subsidies and grants from the EU and public funds equating to 80% of their income, grants and subsidies which are delivered through a structure and system which ensures that the environment on which the industry depends is increasingly damaged. Any environmental enhancement work carried out through Pillar 2 funding is insignificant in comparison with the damage caused by the principal subsidies. This is because the award of subsidies and grants is dependant on farmers increasing the size of their holdings and stock levels and overgrazing / overstocking the land resulting in

environmental degradation and the need for damaging artificial means of maximising production.

The market's demand for cheap food products on supermarket shelves, and hence low returns to farmers, is creating widespread environmental damage as farmers cut corners, follow unsustainable practices and fail to invest in the provision and maintenance of adequate storage. Governments are complicit in this problem by default as increases in the price of food would lead to cost of living increases, inflation and a reduction in the unsustainable holy grails of year on year economic growth and increased consumerism. What is the logic of the UK Government currently negotiating no tariff trade deals with New Zealand at a time of great uncertainty about the future terms under which Welsh farmers will be able to sell to European markets post Brexit? Cheap New Zealand lamb on supermarket shelves is hardly supportive of Welsh lamb producers and there is no reciprocal benefit of such a trade deal with New Zealand for UK producers. It defies logic unless the reason is to ensure that the cost of living is kept artificially low for political purposes.

Instead of maintaining this damaging practice, it is urgently necessary for the Welsh and UK Governments to act in any way they can to ensure that supermarkets and other large buyers of agricultural products pay a fair price commensurate with the cost of production so that the farm businesses can derive sufficient profit to be self-supporting and reduce the need for subsidy support. It is also essential that farmers are encouraged to diversify, add value through processing and new product development and sell to local markets. Increased profitability through higher returns would enable farmers to invest in improving and maintaining their facilities, operate in a more environmentally acceptable way and reduce their dependency on subsidies and grants.

A prime example of the conflict between business economics and the protection of the environment can be found in the responses to the current review of Nitrate Vulnerable Zones in Wales. NFU Cymru reported that in a survey of members a high number expressed the view that the costs of improving their slurry storage facilities to comply with the NVZ requirements would be prohibitive and would force them to change their farming practices or consider giving up farming. However, the same survey also recorded that 73% of respondents had slurry storage facilities that failed to comply with the standards required by the Nitrates Directive, clear evidence that almost  $\frac{3}{4}$  of Welsh farms pose a potential threat to the environment. This is clearly unacceptable if the Welsh Government is serious about protecting and improving its natural resources and a way must be found to tackle issues like this within the proposed Natural Resources Policy.

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## SUMMARY

In summary, I don't believe that any Natural Resources Policy produced and implemented by the Welsh Government can be given any credence or stand any chance of making a real difference unless the following key changes are made to the way that things are managed in Wales.

- The seriousness of the current situation regarding the degradation of much of the Welsh environment and the role of rural businesses in that degradation is publicly recognised and widely disseminated by the Welsh Government
- The Welsh Government uses the opportunity of the publication of the forthcoming Natural Resources Policy to publically declare in detail how it intends to urgently and robustly stop the many issues which are currently contributing to the degradation of the environment within a short timescale
- The Natural Resource Policy will need to overtly provide the means, method and resources to restore the damage already created and to monitor the on-going situation to prevent future deterioration
- The Welsh Government and those who work within it must get out of the pockets of big business interests and take a wider and long term view of policies with the environment and its sustainability at the centre of all policy
- The Welsh Government must either replace Natural Resources Wales with another body that is fit for purpose or provide considerably increased funding and greater guidance and direction to the NRW so that i). the organisations resources and operational procedures and practices are capable of successfully implementing the Policy, ii). its staff have the will and expertise to do so, and iii). the confidence of the general public in the organisation can be restored and maintained.
- The Welsh Government must find a way of ensuring that the profitability of Welsh agricultural businesses is enhanced through an increase in the return they receive from their products rather than through increasing productivity and cutting corners to the detriment of the environment.
- Post-Brexit, the Welsh Government must ensure that any subsidies and grants paid to farmers are for environmentally beneficial as well as business purposes and not for purposes that increase the pressure on the land and its bio-diversity.

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*David Gardner*

David Gardner,  
Environmental and Fisheries Services

12<sup>th</sup> February 2017

13<sup>th</sup> February 2017



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Dear Sir/Madam

**NUMBER: WG29897: CONSULTATION TO INFORM THE DEVELOPMENT OF THE  
NATURAL RESOURCES POLICY**

The Mineral Products Association (MPA) is the trade association for the aggregates, asphalt, cement, concrete, dimension stone, lime, mortar and silica sand industries. With the recent addition of British Precast and the British Association of Reinforcement (BAR), it has a growing membership of over 480 companies and is the sectoral voice for mineral products. MPA membership is made up of the vast majority of independent SME quarrying companies throughout the UK, as well as the 9-major international and global companies. It covers 100% of GB cement production, 90% of aggregates production, 95% of asphalt and over 70% of ready-mixed concrete and precast concrete production. Each year the industry supplies £20 billion worth of materials and services to the Economy and is the largest supplier to the construction industry, which has annual output valued at £144 billion. Industry production represents the largest materials flow in the UK economy and is also one of the largest manufacturing sectors.

With reference to the above consultation, we have divided our response in to two key areas; firstly, matters affecting green growth and secondly, general resource considerations and how these should be considered in the Natural Resources Policy. We trust the following comments are given due consideration.

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

MPA supports the Welsh Government focus on sustainable development and specifically on accelerating green growth by increasing resource efficiency, renewable energy and supporting innovation.

However, in achieving this priority theme, it will be important for the Welsh Government to recognise that cement and concrete are fundamental to energy, climate adaptation and transport infrastructure, as well as to buildings and construction projects. For example, cement and concrete are necessary to construct:

- new power stations, renewable generation projects, like offshore wind farms, pylons, substations and other transmission infrastructure;
- flood defences and flood prevention measures;
- roads, railways, aircraft runways and their associated facilities like hangars and engine sheds;
- large buildings like hospitals, schools, offices and factories
- small buildings like domestic dwellings.

The Mineral Products Association is the trade association for the aggregates, asphalt, cement, concrete, dimension stone, lime, mortar and silica sand industries

Registered in England as Mineral Products Association Limited No. 1634996  
Registered at the above address

Cement manufacturing historically used only natural raw materials but the modern industry today contributes to the circular economy by:

- recycling mineral and metal content as well as recovering energy from fuels - known as ‘coprocessing’;
- taking wastes at the end of their valuable life;
- adding value via a quality product;
- restarting the value chain; and
- mainly finding use in durable and 100% recyclable concrete products.

The cement sector in Wales<sup>1</sup> is reliant on access to key materials, including suitable waste materials, and future availability of these materials is important to the continued environmentally and economically sustainable production of cement in Wales. Future availability of waste materials is a key concern for cement producers and, whilst not a current barrier, should be considered when developing resource efficiency policies and to encourage investment.

Unlike other combustion processes, like power generation, incineration and biomass boilers, the ash from fossil and waste derived fuels form part of the mineral content of the cement and not a waste residue. The total recycled content of all cement manufactured in the UK, through the recycling of waste materials and the use of by-products, was 12.5% in 2015. Almost 2% of this was ash recycled from the fossil and waste-derived fuels.

As such, the cement sector provides local, high added-value opportunities for waste materials that have reached the end of the value chain, and cement manufacturing contributes significantly to the circular economy through resource efficiency in the production processes. Having a healthy domestic cement industry therefore reduces the UK’s need for landfills and incinerators.

Cement manufacturing produces almost no process waste and since 2012 manufacturers have avoided landfill by recovering all process wastes for beneficial uses - either into construction products or as a soil improver/fertiliser. The ability to accept additional waste streams for energy recovery and recycling at cement plants requires multi-million pound investments, and are subject to planning and permitting processes. Such projects may take several years to plan, construct and commission. In order to make such an investment case, the long-term availability of materials to achieve an acceptable return on investment needs to be assured early in the decision-making process.

The MPA believes that the use of waste materials as fuel and raw materials for cement kilns should continue to be supported as a value-adding market for appropriate materials, and that the Welsh Government should be cognisant of the existing benefits already being delivered when developing its Natural Resource Policy. The Welsh Government should be cautious of a ‘one size fits all’ approach that may discourage the supply of alternative materials to the cement industry. The MPA would welcome a targeted hierarchy that places the supply of alternative materials to cement kilns in preference to incineration or energy recovery in ‘Energy from Waste’ facilities, and directed support to encourage the waste sector to turn low value wastes into fuel for the cement sector.

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<sup>1</sup> There are currently two cement kiln sites in Wales, at Padeswood in Flintshire and at Aberthaw in the Vale of Glamorgan, which both use waste materials in their production processes, permitted by Natural Resources Wales

## Natural Resource Considerations

It is frustrating that a Welsh Government consultation on Natural Resources Policy falls short of recognising and appreciating the wealth of natural mineral resources available and the potential value of the minerals products sector to the Welsh economy and society as a whole. Mineral products are critical to deliver the three priority themes identified.

In brief, the minerals products industry in Wales is directly responsible for:-

Welsh sales of aggregates and manufactured mineral products	22.6mt
Annual turnover of the mineral products industry in Wales	£650m
People directly employed in our industry in Wales	3,800
Annual turnover in other sectors of the economy supported by the mineral products industry in Wales	£232m
People employed in other sectors of the mineral products industry in Wales	2,000
Value of the Welsh construction sector - our main customer	£3bn
Jobs supported through the Welsh construction sector	88,000

Without the essential raw materials, our members produce, we would not be able to build homes, schools, hospitals, factories and the associated roads, pipes and other infrastructure. Crushed rock and sand & gravel are used to produce cement, concrete, asphalt, lime, bricks, blocks and mortar. Extensive use is also made of recycled aggregates and secondary materials, derived from the waste products of other industrial processes.

The Welsh road and transport network, energy infrastructure (including green energy) and water and sewage systems rely heavily on the raw materials we extract. Forty per cent of our industry products in Wales are used to maintain existing infrastructure. Other specialist materials are used to manufacture products such glass and toothpaste, and to provide clean water - things we all take for granted.

With the publication of the recent report by Sir Charles Hendry, Wales has the opportunity to lead the way in tidal lagoon power, with the prospect of much larger projects proposed for Cardiff, Newport and the North Wales coast. Given the mineral products sector represents one of the last remaining heavy industries in Wales, providing jobs in rural locations where there are limited opportunities for secure employment, the vital role we play in enabling growth and the delivery of sustainable development will come to the fore, as local mineral resources produced using local people support the delivery of national projects.

Hendry concludes that *“tidal lagoons would help deliver security of supply; they would assist in delivering our decarbonisation commitments; and they would bring real and substantial opportunities for the UK supply chain”*.

While the Cardiff Bay barrage cost £200m to construct, over the next ten years it drew almost £3 billion of regeneration investment to the area, bringing new businesses and with it jobs, homes, tourism and leisure and recreational facilities.

None of this could be delivered without the sustainable development of our mineral resources by the mineral products sector.

In addition to providing the minerals products society requires, to safeguard and enhance our quality of life, minerals developments have the scope to create significant biodiversity opportunities and on a landscape scale, through the progressive restoration of our operations. Such sites create opportunities to contribute to water storage, providing options for flood protection, potable water sources, energy and recreation, helping meet key challenges identified within the consultation document.

We await clarity on how the State of Natural Resources Report, Natural Resources Policy and Area Statements will dovetail to deliver a sustainable and healthy economy, environment and society, but would seek assurance that the sustainable development of Welsh mineral resources is not overlooked in meeting the inevitable challenges to deliver the nature-based solutions.

In terms of improving community and individual well-being highlighted in the consultation document, we must be critical of the decision of the Welsh Government to close the Aggregates Levy Fund (ALF). This short-sighted decision marks the end of community and environmental benefits associated with the Levy across the UK. When the Levy was introduced in 2002 it was intended that around 10% pa of Levy revenue would be spent on a variety of community and environmental projects as a means to deliver environmental improvement across the sector, and reflect the local effects of mineral extraction. The Welsh ALF had invested £20m into community and environmental projects within quarrying communities over the last 15 years and has helped build strong and lasting relationships between the industry and local people.

The Levy itself is a tax raising measure which has no proven direct environmental benefits: companies pay £2 per tonne of aggregates sold regardless of their environmental impact or performance. The ALF was set up to use revenues from the Levy for positive environmental and community purposes and any suggestion that the Aggregates Levy was an “environmental” tax is negated, it is now just about revenue raising.

The Welsh Government had until recently been the only devolved administration which had maintained a Levy Fund. The UK Government receives c£350 million of Aggregates Levy p.a. and, following the announcement by Lesley Griffiths AM, Cabinet Secretary for Environment and Rural Affairs, that a budget for the Welsh programme will not be carried forward into 2017, none of this revenue will now be available for use by communities in quarrying areas and for environmental projects suggesting the. MPA has consistently supported the operation of the ALF as a means to support the delivery of local community benefits and environmental improvements associated with the minerals sector and calls on WG to reinstate the ALF as a means of delivering the Key challenges identified in the consultations in those areas where mineral operations occur.

Whilst the consultation document recognises that natural resources and ecosystems underpin all aspects of well-being in Wales it falls short in recognising the true extent of how this is achieved.

In summary, we believe the consultation is long on words, but short on direction and context to facilitate the delivery of a Natural Resources Policy.

We trust the above comments will be taken in to consideration and are keen to engage during the development of a Natural Resources Policy.

Yours faithfully

A handwritten signature in blue ink, appearing to read 'Nick Horsley', with a large, sweeping flourish underneath.

Mr Nick Horsley  
**Director of Planning, Industrial Minerals and MPA Wales**

13<sup>th</sup> February 2017

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Dear Sir,

## **CONSULTATION TO INFORM THE DEVELOPMENT OF THE NATURAL RESOURCES POLICY**

Thank you for consulting on the statutory Natural Resources Policy to be published by the Welsh Ministers under the Environment (Wales) Act 2016.

These comments are from Dŵr Cymru Cyfyngedig, the statutory water and sewerage undertaker that supplies over three million people in Wales and some adjoining parts of England. We are owned by Glas Cymru, a single purpose, not-for-profit company with no shareholders. We provide essential public services to our customers by supplying their drinking water and then carrying away and dealing with their wastewater. In this way we make a major contribution to public health and to the protection of the Welsh environment. Our services are also essential to sustainable economic development in Wales.

Our comments are set out below, and reflect the discussions we have had at the various meetings you have arranged to support our better understanding of the changes and challenges ahead.

### **Introduction**

The UK's departure from the European Union makes it all the more important that the Welsh Government articulates a clear policy for the protection and sustainable exploitation of Wales' natural resources in the years ahead. Its new statutory National Natural Resources Policy provides the Welsh Government with an ideal vehicle to do this.

No natural resource is more important than water. As well as being essential for all forms of life, water is vital in economic, social as well as environmental terms. We are pleased that the draft Policy acknowledges the importance of "*ensuring a continuous supply of clean water*". We all – Government, its regulators, business and individuals alike - share a responsibility for ensuring the long term resilience of this key natural resource so that, as well as meeting current needs, it will be available to support future human populations and a thriving natural environment.

We recognise that Dŵr Cymru has a major influence on Wales' water resources: most of our comments below reflect that role. Our comments demonstrate that Dŵr Cymru is already acting in accordance with many of the policy themes outlined in the draft National Natural Resources Policy, so we have tried to bring our practical experience into our response. As requested in the consultation, we have focussed on the themes and objectives described in the consultation, with particular emphasis on the need to set priorities, deal with the challenges and barriers we face, and enable change.

### **General**

The Environment (Wales) Act 2016 establishes a regime involving the overarching statutory National Natural Resources Policy which, in due course, will be implemented at a more local scale through statutory Area Statements published by Natural Resources Wales (NRW).

Over recent months we have participated in a number of workshops led by NRW and attended by a variety of stakeholders to help scope the shape and content of Area Statements. It has become very evident that there is as yet no clear picture of how many Area Statements there should be, nor what they should contain.

We think it would help everyone concerned, including NRW, if the National Natural Resources Policy indicated the approximate number, purpose and make up of Area Statements that NRW should produce. It could also usefully set priorities for action against clearly defined criteria. So, for example, no further deterioration of biodiversity and the ecosystem services that we currently enjoy would be a worthwhile first priority: this would also add weight to the biodiversity policy within the Welsh Government's (non-statutory) Nature Recovery Plan and clearly tie the National Policy into the State of Natural Resources Report (SoNaRR).

Building on this, the National Policy could become more of a 'National Area Statement' by identifying pressures that have a pan-Wales impact and, ideally, suggesting practical fundable solutions. An obvious example would be the improved management of agricultural wastes such as manures, to encourage ways of harnessing their value while reducing pollution risk.

A National Area Statement along these lines would go some way toward filling the void that will exist until NRW finalises the first Area Statements in 2019. It would also give NRW a clearer steer about the policies that should be translated into its Area Statements, which it would then tailor to fit local needs and opportunities.

There are lessons that can be learnt from NRW's experience in preparing statutory River Basin Management Plans (RBMPs) to meet the European Water Framework Directive. These documents identify the needs of each River Basin District and should, in our view, feed into National and Area level natural resource planning. However, the greatest weakness of the RBMPs is their failure to recognise that because environmental improvement usually involves actions by various parties, NRW needs to set targets for all sectors, not just the water industry. NRW also needs to recognise its role in the subsequent coordination and enforcement of



delivery if the desired outcome – good aquatic ecological status - is to be achieved. We would therefore like the National Policy to encourage the Area Statements to prioritise actions where solutions are known and drive the changes in incentive frameworks such as the funding of rural communities, so that they are able to deliver controls on, for example, diffuse pollution. The Area Statements could then become delivery documents, driving coherent interventions supported by whatever funding is available from Welsh Government and others. For example, development/growth could be directed toward those areas where the requisite infrastructure, including natural resources, are already in place. Of equal value would be a role in steering inappropriate development or activities away from areas that are vulnerable in terms of flood risk or are sources of major drinking water supplies, for example.

Unless there is some clearer prioritisation, the Area Statements risk becoming unachievable wish lists that make no practical difference on the ground – a real missed opportunity.

The National Policy currently includes no specific measures of success. Setting and publishing measurable targets in the Policy is essential if Ministers are to review progress, as they are required to undertake, under section 9(6) of the Environment (Wales) Act 2016. The targets could, for example, refer to some of the headline findings in NRW's SoNaRR.

### **Theme 1 - Accelerating green growth by increasing resource efficiency, renewable energy and supporting innovation**

There are opportunities in parts of Wales to harness water to promote green growth in sectors such as renewable energy.

Water can either be a catalyst for economic growth or, if not used wisely, can become a constraint as can be seen in those parts of England under serious water stress. The statutory SoNaRR published by NRW last year illustrates the many pressures that Wales' natural resources are under, including its water resources.

If the theme of resilience is to be achieved, green growth needs to be directed toward those parts of Wales where the relevant natural infrastructure is in surplus. The proposed National Infrastructure Commission for Wales could help to shepherd new development toward the most appropriate locations: the Welsh Government may want to include a reference to the National Natural Resources Policy within the Commission's terms of reference. Local planning authorities also hold some of the key levers in delivering sustainable natural resource management on the ground.

The consultation paper recognises that food production is another important natural resource. If this is to be "green growth", the environmental performance of much of Wales' agricultural sector will need to improve significantly, particularly if we are to compete under a World Trade Organisation type system.

To illustrate the point, agriculture is the major influence on the raw water we abstract. Although there has been considerable investment in the sector, for example through the Welsh Government's Glastir scheme, we are still having to cope with its adverse impacts on an almost daily basis: for example, rising levels of pesticides in some catchments threaten our ability to achieve the stringent standards that apply to public drinking water supplies – an essential ecosystem service.

The agriculture sector in Wales is currently very dependent on the EU both for its financial subsidies and as a key export market for its produce. We know that the Welsh Government is already considering how to ensure that the sector prospers whatever the nature of the final exit deal made between the UK and the EU.

From our perspective, there is currently too little join-up between the Welsh Government's policies on water and agriculture although this is, in part, because of the mismatch between some EU incentives and environmental rules. Brexit presents the Welsh Government with a unique opportunity to undertake a fundamental, 'root and branch' review of agriculture in Wales, applying natural resource management principles to the sector. Some difficult decisions may need to be taken about relative priorities and the importance to Wales of food production, versus carbon capture, water quality and quantity, and the needs of the environment. We hope that a better designed package of incentives and regulatory tools will emerge, encouraging Welsh agriculture to embrace its environmental stewardship role, including the need to farm for water and or carbon. If this rethink resulted in 'best practice' becoming 'standard practice' within Welsh agriculture, its reputation - and thus the value of the Welsh food brand – could be significantly enhanced.

A review of the structure of agricultural subsidy and incentives presents a tremendous opportunity for innovation that supports sustainable, green growth. Dŵr Cymru may have a role to play in this where there are benefits in the fulfilment of our functions, for example supporting improved raw water quality in our water source catchments.

The theme also calls for resource efficiency. Dŵr Cymru is playing its part in this objective. For example, we continue to work with NRW to ensure that our abstractions are sustainable. We are committed to keeping leakage from our 27,000 km of mains to a minimum and as a result of targeted investment in recent years we have already managed to reduce leakage by a third. We continue to look for opportunities to generate renewable energy - we have already made significant investment in harnessing solar energy, and using hydro power and anaerobic digestion to create energy which we can use locally.

More generally, given the reliance of our business on the water environment, we recognise that it is our interest to protect it. We continue to reduce still further the impact of our activities and at the same time improve aquatic biodiversity: for example, we are investing about £60 million during our current (2015-2020) programme on improvements to help more water bodies in Wales achieve Good Status under the EU Water Framework Directive. This is

being done by reducing levels of phosphorus and ammonia in some of our discharges, and taking water from the environment in a more environmentally sensitive manner. We are also working in the catchments from which we source our water supplies to improve our understanding of the other pressures affecting the aquatic environment (described in more detail below).

Dŵr Cymru is also committed to innovation. We have recently hosted our third annual Innovation Event enabling us to bring together representatives of our company, academia as well as existing and potential suppliers to our sector. We were delighted to welcome Sophie Howe, Future Generations Commissioner for Wales, to the event so that she could share her insight on how the water sector can support the delivery of the Welsh Government's sustainability agenda that unpins the Well-Being of Future Generations Act 2015.

## **Theme 2 - Delivering nature-based solutions to improve resilience and the benefits derived from natural resources**

Our core business is the supply of essential water and sewerage services. The long term resilience of these services will continue to be one of our top priorities. Dŵr Cymru is currently preparing a long term vision document, "*Welsh Water 2050*", to identify future risks and opportunities and how we will meet them, while improving the services we provide our customers at an affordable price.

Our 2050 vision will complement our statutory Water Resources Management Plans, in which we consider how best to maintain water supplies for the next 25 years. Dŵr Cymru is also playing a leading role in the pan-industry "*21<sup>st</sup> Century Drainage*" initiative which is considering how to deliver more resilient sewerage and drainage services in the long term.

Within this theme, the consultation paper cites some specific opportunities for our sector to adopt a more nature-based approach, i.e. "*water treatment systems, for example swales and reed beds*" and "*sustainable drainage*". We would also include payments for ecosystem services (PES) as an approach that offers potential to support further nature-based solutions. These sorts of options can undoubtedly offer wider benefits for the environment and we continue to be receptive to such ideas, so long as they do not undermine the polluter pays principle.

However, these technologies are intrinsically less predictable than conventional, hard engineered treatment processes and networks. If their use is to become more widespread, both Government and our quality regulators - NRW and the Drinking Water Inspectorate (DWI) – need to recognise the limitations when setting and enforcing the standards with which we must comply. Essentially we must be able to better share the regulatory risks associated with their use. Similarly such investments often need to be made well in advance of when they are required, indeed in some cases more than one 5 year investment period

ahead of more conventional solutions if they are to be given a real chance to succeed. We hope that our “*Welsh Water 2050*” Vision work will enable just this sort of change in regulatory arrangements, whilst at the same time ensuring such an approach does not put us at risk of being penalised by our economic regulator, Ofwat, for any reason.

We would therefore like the finalised National Policy to acknowledge explicitly that the statutory regulators and service providers have an equal role in enabling delivery of such softer, environmentally beneficial solutions.

To underpin this buy-in, and support best value, we would like the National Policy to support the further development of Natural Resources Accounting as an approach to assist both ourselves and our regulators to better make the difficult choices we face.

On a detailed point, there are a number of legal barriers hampering the more widespread provision of sustainable drainage systems (SuDS), such as uncertainty over responsibility for on-going maintenance. Dŵr Cymru remains very committed to the SuDS approach to surface water management both as part of our own investment and for new developments, so we continue to work with the Welsh Government to look for ways to overcome the obstacles.

In the years ahead, we will continue to look for opportunities in the exercise of our functions to enhance biodiversity and promote ecosystem resilience, as required by the strengthened duty placed upon us by section 6 of the Environment (Wales) Act 2016. As the National Policy sets the framework to be delivered by NRW through its Area Statements which will, in turn, influence how we meet our biodiversity duty, we are surprised that biodiversity does not feature more prominently in the Priority Themes, particularly perhaps under “*Delivering nature-based solutions to improve resilience and the benefits derived from natural resources*”. For example, the Welsh Government might want to make the link between nature-based solutions and reversing – or at least halting - the biodiversity decline reported in NRW’s statutory SoNaRR.

We are pleased that you refer to better soil management amongst the list of nature based solutions. The loss of soil represents the loss of farmers’ raw material and is patently unsustainable. Siltation can also cause us real difficulties: it has, for example, been known to force us to stop abstracting water to supply some of our major water treatment works on the Rivers Wye and Usk and elsewhere. Setting ‘General Binding Rules’ as has been successfully done in Scotland would offer a system to improve ploughing and other land management practices to reduce soil run-off.

As a general observation, the Policy is very aspirational, but light on delivery. For example, this theme would benefit from a discussion about what may be blocking the market place from delivering nature-based solutions such as the PES approach, and on how those blockers might be overcome, for example by use of the ‘experimental powers’ granted to NRW under the 2016 Act to set an enforced regulatory floor, delineating minimum standards of land management, above which PES systems can operate.

### **Theme 3 - Improving community and individual well-being by taking a place and landscape based approach**

We very much support this approach. As a company, we are proud of our Welsh identity and we continue to look for opportunities to engage with the communities we serve.

Given the essential nature of the services we provide and their importance to the well-being of our customers, we are very mindful of the need to keep our services affordable, especially for those on low incomes. You may want to make this link in the finalised Policy.

Last summer we invited customers to help us to prioritise how any financial gains should be spent. About 12,000 customers responded and many attached a high priority to our supporting educational, recreational and environmental projects in our communities. As a customer-centred company, we value this feedback and it will influence our thinking in the years ahead.

In the performance of our duties as a water and sewerage undertaker, we are already involved in a number of landscape based and community initiatives some of which are outlined below.

Catchment management is increasingly being seen within Dŵr Cymru as the first line of defence for the protection of our drinking water supplies. Such an approach should enable us to use fewer chemicals and less energy to treat drinking water, which would be good news for our customers as well as for the environment. This is translating into a number of targeted, practical actions in the catchments from which we abstract our raw water. Amongst these is our flagship “*PestSmart*” initiative, recently launched by Lesley Griffiths and which builds on our award winning “*Weed Wiper*” initiative. Under the “*PestSmart*” banner, we are collaborating with the farming community and supply chain to reduce levels of pesticides. We also recently hosted a major conference to share our ideas about the catchment approach with a wide variety of interested parties and, in particular, to explore their views on establishing a Brecon Beacons “Mega Catchment” to recognise the connectivity of the various water sources we rely on in that area.

One of the lessons we have learnt from our work in our water source catchments is the importance of collaboration and harnessing people power. But that requires facilitation, i.e. an independent person who knows - and enjoys good working relationships with - key local players. Dŵr Cymru was represented at one of the Welsh Government’s workshops to discuss the Natural Resources Policy and amongst the useful ideas that emerged was the suggestion that a central list of possible facilitators be established. This could be supported by a database of possible sources of funding and best practice, so that facilitators had ready access to this sort of information.

As a major landowner in Wales, Dŵr Cymru is involved with and contributing funding toward a number of other landscape scale initiatives. One example is the Black Mountains Land Use Partnership which was formed in 2015 with funding from the Welsh Government's Nature Fund. Dŵr Cymru works alongside NRW, Brecon Beacons National Park Authority and representatives of land owners and managers in the Black Mountains Site of Special Scientific Interest (SSSI) to restore the habitat within this cross border site. The Partnership is developing a bid to the Welsh Government's Sustainable Management Scheme which will look at delivering further works in the area, including the feasibility of a PES scheme, visitor management, education, and improving rural skills.

A separate project is taking place at Waun Figlen Felen, situated within Mynydd Du SSSI, which has suffered from peat erosion. However, it has recently seen significant recovery through habitat restoration interventions led by the Brecon Beacons National Park Authority. Dŵr Cymru has been working with the Park Authority, NRW and other stakeholders on the Management Forum to deliver actions on the ground. Through our business plan, we were able to commit funding to deliver further outputs at this site by the end of 2020.

We are also trying to encourage community engagement. Through our Water Framework Directive funding initiative we have supported a number of projects by voluntary organisations, such as Groundwork North Wales' "*River Schools*" educational programme which aimed to raise children's awareness of the river environment; and the "*Alun and Chwiler Living Landscapes*" project, enabling the North Wales Wildlife Trust to increase the connectivity between habitats; and the "*Healthy Rivers*" project which saw Groundwork Wales facilitating volunteering opportunities to help remove obstacles preventing fish migration in local rivers. We continue to support worthwhile projects by not-for-profit organisations which improve aquatic biodiversity.

Similarly, our Invasive Non-Native Species (INNS) Funding scheme has also supported landscape scale projects with the focus on control, management and eradication of INNS through the collaborative approach. The Dee INNS project, led by the North Wales Wildlife Trust, is an example of a project that aims to raise awareness of communities and landowners about INNS and measures to prevent their spread.

However, our experience of the landscape scale approach suggests that there are a number of major barriers to be overcome if more such projects are to proceed.

For example, thought needs to be given to how best to sell the landscape approach. If there was guidance or, ideally, an evaluation framework based on Natural Resources Accounting, it might be easier to persuade different stakeholders to become involved. Currently it can, for example, be difficult to persuade those upstream to change their practices for the benefit of downstream users (e.g. changing upstream land management practices to protect coastal bathing waters).



Allied to that, the sustainability of landscape scale projects is often threatened by a lack of long term funding and commitment. For example, the Waun Fignen Felen habitat restoration project described above is facing uncertainty post 2020, as the partners are unable to commit longer term funding. Some of the projects funded through our Water Framework Directive funding scheme have also experienced difficulties in continuing to deliver benefits after our funding has ended. In the current financial climate, including the implications of leaving the EU, many landscape scale projects face a very uncertain future, so their full benefits may never be realised. The National Policy provides the Welsh Government with an opportunity to indicate that it will look sympathetically at public bodies wanting to commit to long term projects.

I hope that you will recognise that Dŵr Cymru is already progressing a wide range projects investments and initiatives which support the development and implementation of any future Natural Resources Policy. We very much look forward to continuing to work with other sectors to drive the changes needed here in Wales, such that we can provide a sustainable environment, one we are proud to hand to future generations. I hope these comments are useful and would be happy to discuss them with you if that would help.

I am copying this letter to your colleagues in the Welsh Government's Water Branch as well as to Ceri Davies at NRW.

Yours faithfully,



Tony Harrington  
Director of Environment

## Consultation Response Form

Your name: Andrew Osborne

Organisation (if applicable): Torfaen County Borough Council

email / telephone number: andrew.osborne@torfaen.gov.uk

Your address: Neighbourhood Services  
Torfaen County Borough Council  
Ty Blaen  
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NP4 0LS

**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.

### **Torfaen County Borough Council Response**

#### **General Support and Commitment to the proposed Natural Resources Policy**

Torfaen County Borough Council welcomes the approach being taken to develop a Natural Resource Policy for Wales. Indeed the authority has already demonstrated leadership in taking forward many of the concepts and approaches during the last three years with the support of WG ESD funding and Nature Fund grant, resulting in:

- Integrated workforce planning aided by the Torfaen Aligned Resource Management Framework which was created to encourage council departments with natural resource responsibilities to work more closely together and be better aligned to make sustainable decisions. It is important to communicate the fundamental importance of embedding natural resource management (and well-being) into the everyday governance and decision making structure of public



bodies, rather than it being regarded as a project that can be delivered should funding be available.

- Creation of the South-east Wales Upland Commons Natural Resource Management Plan, a landscape scale plan for Torfaen, Caerphilly and Blaenau Gwent, with a range of practical projects delivered to support the rural economy, tackle climate change, support biodiversity and deal with landscape crime.
- A Pollinators for Life project including a Pollinators Green Infrastructure Action plan and a multitude of community based practical projects across Torfaen, Caerphilly, Blaenau Gwent and Monmouthshire, including pollinator verges, bee keeping training, new orchards and education initiatives.
- Development of the Monmouthshire and Brecon Canal Adventure Triangle Project, a partnership between Torfaen County Borough Council, Glandwr Cymru and Caerphilly County Borough Council. The £4M project aims to maximize the tourism potential of the Monmouthshire and Brecon Canal in association with walking, cycling and horse riding trails across Mynydd Maen, linking key hubs such as Pontymoile Canal Basin, Cwmcarn Forest, Greenmeadow Community Farm and Blaen bran Community Wood.

The Council has three corporate priorities, namely A Clean and Green Torfaen, Support for Torfaen's Most Vulnerable People and Raising Educational Attainment. All three priorities are supported by investment in our natural resources, the creation of better jobs closer to home to improve community cohesion and improved use of natural resources to support local economies. We are particularly keen to ensure we maximize green growth opportunities through resource efficiency, renewable energy and supporting innovation in low carbon technology. We are also committed to developing nature based solutions that support vulnerable people. This includes the provision of a well maintained network of green spaces, walking and cycling trails, creating opportunities for local food growing and wider volunteering, and creating sustainable land management solutions to tackle the impacts of climate change including the management of flood risk.

### **Key steps that need to be taken**

If the high level policy commitments are to achieve their aims, more emphasis is required at a Welsh Government level to engage other sectors, particularly economic development, health and education.

For example despite overwhelming evidence of current and future life threatening and budgetary trends relating to mental health, obesity and type 2 diabetes, very little if any core government funding appears to have been allocated to green infrastructure investment and community based promotions to support and encourage healthier mental and physical lifestyles. Indeed the Welsh Governments Infrastructure Investment Plan focuses largely on grey infrastructure, with minimal attention given to green and blue infrastructure solutions, despite the

overwhelming potential the latter have to stimulate economic, social and environmental well-being.

Most of the major economic growth and regeneration programmes appear to have adopted a traditional economic development model. More inclusion of the wide scale opportunities that the natural resources provide in supporting the economy, maintaining health and well-being, supporting community food growing, tackling climate change and connecting transport hubs should be considered. There is also a huge opportunity, at a city region level, to develop one or more landscape scale approaches to manage the natural resources of the region.

References to Development Planning are limited and it would be beneficial to acknowledge that the planning system is necessary and central to achieving the sustainable development of Wales. Involvement of Local Planning Authorities in the development of the new Area Statements would also be beneficial.

Consideration should be given to the profile of natural resource policy which requires reviewing at a Welsh Government level in collaboration with local authorities. In order to meet legislative duties, it should form an integral component of any current or proposed governance arrangements within the context of the recently published white paper on reforming local government.

## **Barriers**

There are cultural, funding and policy barriers that need to be addressed in developing the natural resource policy. The cultural issues focus on a long history of delivering different public services separately rather than the integrated approach now required through the WBFG Act. There appears to be a need for increased knowledge and understanding regarding the role that natural resources can take in tackling societal issues in some sectors. This would ensure that natural resources feature more strongly in major regional initiatives being taken forward, particularly within the economic development and health sectors.

In terms of funding barriers, within the health and social care sectors, heightened recognition and funding support is required for long term preventative lifestyle change actions such as outdoor activity (walking, cycling, volunteering etc.). This can help stop ever increasing numbers of people becoming obese and/or diabetic with the consequent budgetary implications on health and social services. It will also provide more cost effective complementary approaches to the treatment of poor mental health, and can arguably help prevent mental health problems in the first place by encouraging healthier lifestyles. Funding opportunities need to be more resilient, flexible and appropriate to maximise the benefits and goals within the Well-being of Future Generations Act. Some current funding streams and financial year restrictions go against the essence of the well-being goals and natural cycles.

There are some policy barriers where the protection and management of land for the benefit of biodiversity is often not within planning control, and we have some recent examples of damage to SINC's through inappropriate management. Support or protection for valued land from negative private management practices would therefore be welcomed.

Delivery of the Natural Resource Policy also requires sufficient financial resources to be made available to embed the thinking in mainstream activity. For example the current local authority ESD grant allocation, understandably, is in the main allocated to waste and recycling activities. However, Welsh Government should also seriously consider investing more actively in encouraging green growth, adopting nature-based solutions and developing landscape scale approaches to improve community and individual well-being.

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

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

☐

## **WELSH GOVERNMENT NATURAL RESOURCES POLICY**

### **CONSULTATION RESPONSE**

**NAME** Phil Holmes – Head of Planning and City Regeneration Service

**ORGANISATION** City and County of Swansea

**ADDRESS** Civic Centre, Oystermouth Road, Swansea , SA1 3RY

**TELEPHONE** 01792 635777

#### **1. GENERAL COMMENTS**

We welcome the development of the Welsh Government's Natural Resources Policy (NRP) and broadly agree with the three priority themes identified.

We are looking for the NRP to give clear direction, vision and leadership to show how Natural Resource Planning will be delivered across Wales.

Each of the three themes should identify clear priorities for action and a mechanism for delivery. Clarification is sought whether it is intended that the NRP will be implemented primarily through the Area Statements, or through a range of other mechanisms. For example, Local Authorities and other public bodies could be encouraged to address these priorities when developing their own Biodiversity Plans (as required by the Environment Act).

The NRP needs to emphasise this is a long term, holistic approach and that managing natural resources is about balancing conflicting demands. Priority needs to be given to restoring, maintaining and enhancing healthy functioning and resilient ecosystems so that they are able to sustain the range of ecosystem services they provide. We are looking for the NRP to be a central principle guiding across all of the Welsh Government priorities – including housing development and infrastructure provision.

#### **2. SPECIFIC COMMENTS ON CONTENT OF DOCUMENT**

##### **Section 1- Natural Resources and well being**

- Suggest adding 'food security', and 'the increasing demand for housing land' to the list of key challenges.
- Also suggest adding the words 'restoring, maintaining and enhancing' before 'biodiversity, which underpins the structure and functioning of our ecosystems'

##### **Section 2 – The approach – to sustainably manage our natural resources**

The Policy is not clear that the 'ways of working' it refers to are the WFG Act's ways of working. It does not map the areas of synergies or cross over with SMNR.

Specifically, in the 'How will we do this?' section principles are listed, and it could be useful to map these or state the synergies with the WFG Act's 5 Ways of Working. Within ANNEX1 (Sustainable Management of Natural Resources) four of the ways of working map across, but integration is conspicuous in its absence. This is a critical gap as aligning objectives with those of the wider public sector and their areas of work is necessary to achieve the core themes identified in the policy.

## The Role of the Natural Resource Policy

There is a need for consistency in the use of acronyms e.g. the NRP is also referred to as National NRP in the same paragraph. Also there should be reference to the NRP supporting the delivery of the Environment (Wales) Act as well as the WBFG Act.

There is no mention of the role of the Wales Biodiversity Strategy Board and the Nature Recovery Plan in this section although it is mentioned in section 3. It would be helpful to explain the relationship between the Nature Recovery Plan and the Natural Resource Policy. It would also be helpful if the ~~a~~Acronyms were not the same – possibly by renaming The Natural Resource Policy the Sustainable Management of Natural Resources Policy (SMRNRP) or Welsh Government's Natural Resource Policy(WGNRP).

A more comprehensive infographic showing the relationships between the various plans, policies, legislation and partnerships would be helpful.

## Area Statements

We welcome the outline of how the Natural Resources Policy is part of the wider delivery framework that includes the SoNaR Report and Area Statements. We would expect the NRP to establish clarity on the roles and relationships of these different elements. In particular, we hope that the NRP will provide the definition that stakeholders are asking for in relation to Area Statements – particularly the spatial basis on which Statements will be generated.

We believe that Areas based on existing administrative/organisational boundaries will be the easiest to implement, ensuring ownership amongst stakeholders and avoiding potential difficulties over accountability, monitoring and reporting mechanisms.

There needs to be clarity on who has responsibility for and will be involved in delivering the Area Statements and how these relate to Local Authority Biodiversity Plans, the LBAPS and other plans such as AONB management plans , shoreline Management Plans , Air Quality plans ~~eteetc.~~

It is not clear whether the role of the Area Statements is mainly to provide the evidence base to support the identification of local priorities , or whether they will also set out specific actions and delivery partners/timeframes etc.

## Section 3 Developing the Natural Resources Policy

The list of Challenges needs to include:

- 'Loss of biodiversity'

We support the statement that 'the NRP can provide a strong pro-active platform which supports action on biodiversity across the public sector' , but seek clarity on the 'local partnerships' that 'will help public authorities to deliver the objectives of the Nature Recovery Plan and address their Biodiversity and Resilience of

Ecosystems duty'. Are these the existing local Biodiversity/Nature Partnerships or new Area Statement Partnerships or something else?

### **3. COMMENTS ON EACH OF THE THREE KEY THEMES-**

including key risks, priorities and opportunities for SMR in Wales, key steps to deliver and the challenges and barriers that need to be addressed

## **THEME 1 – ACCELERATING GREEN GROWTH**

### **Resource efficient economy**

It must be recognised that Green Growth does not only apply to headline projects, and needs to be in messages to the public, and guidance/legislation that underpins the wider economy /businesses which have control over the natural resources in Wales. Guidance needs to be backed up with incentives, investment and more innovative ways of working for businesses to maintain commercial viability (and/or disincentivise “traditional” non-green business models), for example, through the Sustainable Development Fund and achievement of a critical mass where Green Growth solutions become economically viable as more people use them.

Finite resource management expectations need to be explicitly mainstreamed into wider governance and financial management arrangements. There is a need to identify levers and specific actions including reviewing procurement policy across the public sector. In particular, there needs to be better management and use of water (and associated hydro-electricity power generation opportunities). There are also opportunities for commercial exploitation of waste and surplus water.

Case studies of good practice in Green Growth and the circular economy need to be identified and pilot projects taken forward by Welsh Government, Natural Resources Wales and local authorities in partnership with the private sector as appropriate.

There needs to be Wales-wide mapping of green assets and the ecosystem services they provide to enable greater understanding of their economic value and the contribution they make to health and wellbeing. We need the tools and expertise to be able to calculate the financial value of our natural capital at a local level (PES).

### **Renewable Energy Projects**

The potential for further growth is recognised, however, as the Swansea Bay Tidal Lagoon case highlights, there are often significant tensions, conflicting policies and strategies between local authorities aspirations to encourage growth and innovation

and the need to deliver on obligations to protect and enhance the natural environment and comply with legislation, which can be seen to inhibit growth. Going forward Welsh Government will have a key role to play in helping to overcome these barriers and perceptions of barriers and encourage more collaborative and integrated ways of working as set out in the Well-being of Future Generations Act. Local authorities alone cannot become the champions of renewable energy development and organisations such as NRW will need to become more accommodating.

Commercial viability is another obstacle and there is a need for long term thinking and funding mechanisms that take account of life cycle costs. Renewable Energy projects are a good investment opportunity in the current economic climate as demonstrated by the community based solar PV panel Swansea Community Energy and Enterprise Scheme (SCEES). With adequate staff resourcing there is significant potential for local authorities to set up renewable energy companies such as SCEES which provides a 6% return on investment, reduced energy costs for host building occupiers and funding for local community schemes. Invest to save opportunities need to be identified and promoted as good practice.

With the recommencement of Council house building, there is an opportunity for local authorities to be exemplars of good practice in tackling energy poverty through the design and construction of properties, for example through Passivhaus standards, use of locally sourced materials and sustainable building techniques which maximise the use of recycled natural resources in order to showcase the quality of life benefits of natural resource management.

Greater financial support/investment is needed in the infrastructure necessary to improve digital communications and encourage a switch to electric cars, supported by a more integrated transport system that encourages modal shift towards more sustainable public transport. This is a key element of better place-making and building more sustainable and resilient communities.

Wales-wide mapping of all potential renewable energy resources needs to be drawn together to identify opportunities and synergies.

### **Innovative Products and Services**

There is need to better engage with tourism providers who benefit from the quality of Wales' natural environment to identify how they can contribute towards sustaining and capitalising upon the natural assets on which their businesses rely through, for example:

- Green apprenticeships
- Visitor payback
- Adventure tourism
- Contribution to the management of habitats and green infrastructure (e.g. cycle paths)
- Promotional improvements
- Seeking greater uptake of alternative markets such as Geoparks and Dark Skies to make the most of green and heritage tourism

- Raising awareness of the value of the natural environment and encouraging responsible use

Local businesses, local authorities, Visit Wales and third sector groups need to work together to deliver local brand products and services and develop niche markets within the tourist sector. Also linked to the place and landscape based approach there is a need for private/public partnership working in order to establish a mechanism to effectively introduce a Payment for Ecosystem Services product to the commercial market.

Exiting the single market (and EU funding) could be an opportunity for better SMR, or alternatively the drop in EU subsidy could result in intensification.

Local food supply chains need to be developed, building on best practice to ensure food security and reduce food miles. EU subsidies can no longer be relied upon, so there will be a need to refocus on higher value “green”/sustainable products with a place-based or Welsh themed brand to maintain financial viability.

There is an opportunity to define value across supply chains in broader terms. Integrated Reporting values natural, human and social/relationship capital as well as traditional financial, manufactured and intellectual capitals captured on balance sheets. This would make balancing the competing demands of the national well-being goals when making decisions more effective. This approach is increasingly accepted as best practice in the finance profession with a recent Value Creation in the Public Sector Report produced by the Chartered Institute of Public Finance Accountants (CIPFA) and the International Integrated Reporting Council (IIRC). The report summarises the approach and benefits of the approach. Wales Audit Office is involved in the IIRC Public Sector Pilot.

## **THEME 2– NATURE-BASED SOLUTIONS TO IMPROVE RESILIENCE AND THE BENEFITS DERIVED FROM NATURAL RESOURCES**

### **Priorities**

The evidence cited in the SoNaRR about Wales’ declining biodiversity means that the key priority must be to restore, maintain and enhance biodiversity and healthy functioning, resilient ecosystems both for their intrinsic value and in order that they are able to provide valuable ecosystem services.

The NR Policy must set out a clear plan for achieving all 20 of the Aichi Biodiversity Targets and the delivery of the Nature Recovery Plan

WG needs to provide leadership and guidance as well as policies and incentives to encourage SMNR. This could include:

- Ensuring that SMNR and principles are embedded into other guidance e.g. Planning Policy Wales and the TANs to ensure delivery at a local level .



Consider whether there is a need for specific planning guidance on SMNR and Green Infrastructure

- Ensure stronger protection for Sites of Importance for Nature Conservation (SINC's)
- Promote Integrated Reporting that values all capital- PES

#### Evidence base

Unsustainable incremental growth is the problem

Provision of better data and mapping of natural assets and ecosystem services at a local scale is required in order to inform decisions, especially when dealing with conflicting objectives.

Delivering SMNR will require the data, tools, expertise and evidence base to measure carrying capacity and ecological footprints.

It is critically important for government policies to be soundly grounded on evidence-based evaluation of biodiversity in Wales. A key step towards ensuring this is the case is continued support for the four Local Environmental Record Centres in Wales.

#### Biodiversity Partnerships

The NRP needs to recognise the role and value of the existing Biodiversity Partnerships in harnessing and coordinating action at a local level by statutory and voluntary sector organisations and individuals. These have a strong track record of collaborative delivery of biodiversity action and can provide a ready-made vehicle for helping to develop and deliver Area Statements and the NRP. The NRP should commit to supporting their ongoing development.

#### Capacity and resources

A priority for the NRP will be to increase the level of expertise and capacity to deliver SMNR through training and awareness raising and increased funding for staff particularly at Local Authority level to facilitate, co-ordinate and deliver SMNR in collaboration with its partners .

#### Air Quality

One of the most important public health challenges must be that of air quality. When considering the health effects of the current problems, this is clearly allied to the effect of road traffic noise on many residents. It has been established by recent research that the negative impacts of poor air quality and excessive road traffic noise are very similar, but sadly both problems are generally affecting the same communities. Whilst Green Infrastructure and tree planting can help to help reduce the impact of road traffic emissions, the overall improvement to the poorest communities will be minimal to say the least. Major policy changes may need to be made in terms of, local development plans, local transport, modal shift, better location of schools to reduce commuting etc.

There seems to be a real danger that the focus on the more obvious elements of natural resources will result in a lack of focus on these difficult regional planning issues. There must be areas of improvement that are possible in the medium term by

ensuring that the proposed mechanisms can draw attention to better infrastructure planning and an overall reduction in the amount of car journeys for people to go about their normal daily lives. This cuts across many public policy areas; for example, the significant reduction in vehicular traffic during school holiday periods highlights the volume of traffic the school run generates and the pressing need to introduce measures, incentives and alternative travel options to encourage parents to send their children to their local school .. It could be argued that the same applies to hospitals, however even though hospitals recognise they have car parking problems, schools generate a bigger congestion problem because of the fixed timing of the journeys.

#### Water Quality

Other issues are touched upon which are important in the longer term even though the public health impact is less obvious. A good example of this is the improvement of water quality. It is generally true that quality has improved over the last few decades, however it is always going to be difficult to have good quality bathing water at all the right places, but this has a strong but subtle impact on the well-being of the local community. Plenty of evidence supports this issue in terms of the health of swimmers but also in terms of encouraging local residents to exercise generally and use the outdoors for a wide variety of exercise. In Wales we have a good reputation for developing smarter ways of delivering good quality bathing water but also smarter ways of communicating that to the local residents. Welsh government need to encourage these projects to build on the current advantage created by the various partners (Welsh water, NRW, local authorities). It has been shown in Wales that using an approach of predicting water quality accurately to protect water users is a cost-effective way of managing complex bathing waters. Some local authorities are also trying to deal with mis-connection issues around the drainage infrastructure, but this is difficult when there is no clear funding stream for this work. That has been an obvious barrier over the last few years, which despite the number of related benefits identified in this consultation document is an area that is disappointingly not being addressed .

Obviously public water supplies have improved steadily, however private water supplies have been more difficult. Generally, the framework is now in place to deal with private water supplies more effectively, but this is still a long term project. Given the current financial pressures on local authorities, this is an area of work which is likely to slow down as environmental health services struggle to deliver all their priorities with less resources.

#### Soil Protection

There is often an inherent conflict between providing more land for housing at sustainable locations and protecting the best and most versatile agricultural land. Where Grade 1-3a land is to be lost to development, developers should be required to implement compensatory measures to improve the quality of poorer quality land nearby to enable it to be brought into productive use.

Better mapping is needed at a local level to identify which soils are suitable for food production in both urban and rural areas

Local authorities are struggling to deal with contaminated land, but this has not been driven by financial constraints, the bigger issue has been the failure of the legislation to deliver its original intention. It should be recognised that there is a long-term risk in Wales given the lack of focus resulting from this failure. This is a particular concern given the amount of new housing being developed on contaminated sites.

In Swansea urbanisation is a key challenge for natural resource management as large green field areas are being allocated for development. This is hardly mentioned in the document. It would be useful to have policy/guidance on dealing with such issues. Measures and incentives need to be introduced to require developers to better utilise green energy, safeguard ecosystem services and improve overall biodiversity on a wider scale.

#### Coast and Marine

The importance of coastal and marine ecosystems is hardly mentioned: the policy needs to be clear that it covers both the terrestrial and marine environment

### **THEME 3 – IMPROVING COMMUNITY AND INDIVIDUAL WELL-BEING BY TAKING A PLACE AND LANDSCAPE BASED APPROACH**

This theme is about taking actions and interventions at scales appropriate for the problem. This means that strategies and plans for Natural Resource Management should take account not just of the existing political and administrative boundaries by which areas are managed but also less tangible social concepts of community, locality and region with which people may identify. They also need to take into account the ecological and physical boundaries created by for example variation in topography, geology, soils and therefore ecosystems. A combination of these factors will help to determine the most appropriate and effective scale for actions and interventions.

It is well-established that a healthy physical and biological environment (including air and water quality – see above) is strongly-linked to community and individual well-being. There are currently, for a variety of reasons, inequalities in citizens access to the benefits of Wales' natural resources and it is imperative that the NRP ensures that these benefits, or ecosystem services, should be available and accessible to all.

Some particular aspects which the NRP and resulting strategies and plans should focus on are:

- Ensuring that available natural assets have been mapped at a range of scales including community scale to identify gaps in provision as well as give a baseline from which to measure future growth or decline. This will involve the collation of much existing information as well as gathering new data.
- Supporting the creation of new areas where they do not exist and are needed to address deficiencies and inequalities in provision

- Ensuring that awareness of the benefits of natural resources (ecosystem services) to individuals, communities, and Wales as a whole is raised among all communities in Wales
- Identifying areas where natural greenspaces can support public access and provide ecosystem services without impacting negatively on biodiversity and ecosystem resilience
- Supporting and developing public access to greenspace, where that is sustainable and not in conflict with the maintenance and enhancement of biodiversity and ecosystem resilience.
- Ensuring that all citizens have access to local green-space ranging from “natural” (e.g. Local Nature Reserve) to “managed” (e.g. formal gardens)
- Ensuring that physical and financial barriers to accessing the benefits of natural resources are reduced or removed – for instance:
  - by supporting sustainable affordable public transport infrastructure which allows people across the socio-economic spectrum to travel to local natural landscapes
  - by directing marketing resources towards encouraging local people to make the most of Wales’ natural assets as well as tourists and visitors from outside the area
- Directing stronger cooperation and collaboration between the environment and health sectors to deliver effective improvement in well-being.
- encouraging multifunctional uses of open-space where this is sustainable and appropriate – for example sports fields becoming more nature-friendly by allowing certain areas to “re-wild”
- Encouraging strategies which support community ownership and stewardship of green spaces, including exploring opportunities for private sector social investment, volunteering and community currencies such as LETs and time-banking
- Promoting funding strategies which provide the on-the-ground support and enabling which will be needed to build community resilience for the long term. To engage with communities, and consequently to support, monitor, review and support continuously is a considerable task requiring expertise and resources.
- Advocating access to the benefits of natural resources from the earliest stages of an individuals’ life experience so that contact with nature becomes an entitlement from early years, and a statutory requirement for children through their formal school career and into early adulthood. This will go a long

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way to embedding a meaningful lifelong connection with nature in the future citizens of Wales.

#### **4. BARRIERS TO SUSTAINABLE MANAGEMENT OF NATURAL RESOURCES**

There are some key barriers and challenges across all three themes as listed below:

##### **Resolving Competing Demands**

There are often conflicting priorities and policies and incentives both between and within organisations which are difficult to resolve. The challenge is managing how we promote growth *and* maintain a healthy, resilient natural environment, for example, the demand for housing land, or sale of land is often in direct conflict with SMNR. In particular, at present, economic needs often seem to take priority.

Guidance is needed on how to resolve these issues taking into account the true value of our natural resources and the ecosystem services they provide. This requires a sound evidence base, and a good understanding of ecosystem functions and values. A consistent policy approach is needed to inform the way that organisations prioritise and also achieve a balance across each of the well-being goals. Improving the communication and understanding of objectives across organisations is a necessary prerequisite to achieve alignment. It was notable that while four of the five ways of working are clearly mapped in the Appendices, integration is conspicuous by absence. Integration is a real opportunity to ensure the goal of a resilient Wales is considered in all policies.

##### **Awareness and understanding**

Delivering SMMNR will require a sound knowledge of our natural resources at a local level and an understanding of ecological footprints and carrying capacity.

There is a need for training and awareness raising for decision makers to increase knowledge and understanding of SMNR principles

##### **Resources and Funding to manage the resource/assets**

Additional resources will be needed to deliver SMNR

Loss of expertise and capacity at a Local Authority Level is a concern and funding should be provided to maintain and increase staffing capacity and maintain continuity where needed

Reliance on short term funding (e.g. Grant aid) and annual budgeting cycles does not support a long term approach

- Long term over short term gain, problems of annual budgets as against whole-life costings....investing in green growth to save in the future, funding from WG needs to be part of the agenda from top-down

##### **Need for greater collaboration**

The common theme through most of these challenges is the lack of true collaborative work and joined up funding. Most of the issues above will only be successfully tackled by much better collaborative work between all the various public sector players, including pooling of resources to achieve shared outcomes.

### **The Need for Clarity**

Use of Jargon can be a barrier. Also the complexity of the many overlapping plans and strategies is sometimes confusing and can be a barrier to engagement

## Consultation Response Form

Your name: Steve Knowles

Organisation (if applicable): The City of Cardiff Council

email / telephone number: 029 20 873234 sknowles@cardiff.gov.uk

Your address: Energy & Sustainability Dept, County Hall, Cardiff Cf10 4UW

**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:

### RESPONSE

The key objective that the Energy & Sustainability Dept would respond on is:

- Accelerate green growth by increasing resource efficiency, renewable energy and supporting innovation.

The key steps to deliver on this objective would include:

- Making it clear how public sector targets are to contribute to meeting UK & Regional CO2 reduction targets.
- Aligned interest, and improved understanding, between public sector & DNOs, so that it is in the DNOs interest to have more local energy generation.
- Keep legislation as up to date as possible with renewable energy generation technology.

Some of the key barriers would include:

- There is currently a conflict between the fast paced, and unpredictable, energy subsidy context, where tariffs are dropping, and the length of the public procurement and political decision-making process.
- The lack of a WG Framework for public sector procurement of renewable energy related works.
- Local authorities are risk averse in relation to capital investment. In addition, grant bidding is very time consuming and competitive, and organisations such as Innovate UK are primarily focused towards industry.

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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## Consultation Response Form

**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

1. *The issue of light pollution and what can be done to minimise this should be given consideration. Our Dark Skies is one of the most majestic and oldest natural resources we have, and luckily in Wales, there are still vast amounts of the country which are affected by very little light pollution. This is demonstrated with the number of International Dark Skies designations we have in Wales now. This includes Brecon Beacons and Snowdonia National Park respectively, and The Elan Valley Estate in mid Wales with many other places having smaller but equally as important designations such as Pembrokeshire Coast National Park and Ynys Enlli (Bardsey Island). In addition, several areas are looking into the possibility of getting Dark Skies designation themselves, and there is a growing appetite to have a National observatory set up in Wales, with the organisation Dark Skies Wales having already looked into it. Indeed, approximately 18% of Wales' land cover now has a Dark Skies designation, making it the country with the highest percentage of land with official protection against light pollution anywhere in the World, something we should be very proud of but should not rest on.*

*Socio-economic studies undertaken at other Dark Skies reserves within the UK (Galloway Forest Park, Scotland) showed that at a minimum, the financial return to the local economy from having the designation was 2:1. However, this is likely to be substantially bigger given the little cost associated with getting the designation. Such projects are also an exemplar of SMNR as they clearly demonstrate many, if not all, the 9 principles of SMNR and contribute significantly to the 7 Well-being Goals for Wales. The benefits are too numerous to give details here, but examples would include:*

- *Reduced energy usage by i. using responsible LED light fittings which are much more efficient than traditional sodium burning street lighting and/or ii. reducing/turning off some lighting during unsocial hours (where appropriate), something which can be done with modern LED lighting;*
- *This, in turn, would have positive impacts on wildlife, particularly when focused on specific areas of ecological importance, as there's a growing body of*

*evidence out there as to the adverse impacts of artificial lighting on nocturnal wildlife.*

- *Health and well-being; studies show that being subject to high levels of artificial lighting can have adverse impacts on human health, including sleep deprivation, stress and in some extreme cases, an increased risk of cancer. Conversely, having access to clear dark skies can have significant positive impacts on people's mental and spiritual well-being.*
- *Socio-economic opportunities associated with the Dark Skies are both varied and numerous. Taking people/groups outside during darkness on star gazing tours or to specific places can have substantial mental and physical benefits for those people. Indeed, some are able to make a living (or supplement other incomes) from offering opportunities in star gazing. The knock on benefits to other tourist providers and other businesses associated with the tourist industry can only be a good thing, and as star gazing is an activity which can be undertaken throughout the year, it offers the potential to extend the tourist industry in Wales.*

*Taking into account all of the above, it strikes me as a project which could involve EVERYONE – PSB members (LA in terms of public lighting, Health Board, NRW), designated landscapes, third sector organisations, schools and colleges, the voluntary sector, the private sector etc.*

2. *Whilst I generally support and agree with most things said in the consultation document, there must be the mechanisms in place to implement the actions required to make changes. One of the biggest (if not the biggest) mechanism we have in Wales is through Glastir, or whatever agri-environment scheme we have in place post Brexit. It is therefore vital, in my opinion, that future agri-environment schemes MUST implement the National Policies and subsequent priorities of Area Statements as currently, Glastir is failing to deliver half of what it should.*

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Consultation  
Response  
Form

**Natural Resources Policy development**

Your name: Prof D.Skydmore

Organisation (if applicable):

email / telephone number:

d.skydmore@glyndwr.ac.uk

Your address: Glyndwr University, Wrexham

**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.

Thank you for the opportunity to make comments during this consultation.

The Welsh Government's approach in developing a Natural Resources Policy is to be commended both for its use within Wales and the leadership that it will give internationally.

I wish to make some comments about the priority themes.

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

Moving towards a resource efficient economy whilst increasing employment and revenue is a crucial direction to take. By promoting this approach throughout this and other government policies for business and research, Wales will be provided with new opportunities for innovation and production.

However, it will be important to put in place mechanisms and safeguards by which new technologies can be assessed for any environmental damage they may produce. This will also be the case for renewable energy technologies. Not only does net carbon production from these technologies need to be assessed but so does their environmental impact e.g. the energy input into concrete bases and infrastructure for wind turbines against the energy that the turbine produces. It would be useful to have guiding principles about the priorities between renewable energies and environmental damage.

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

Understanding the integration of natural environment, green spaces and health and well-being, and developing this integration, are critical.

However it does need to be recognised, that some ecosystems are fragile and cannot be used for amenity activity. These ecosystems still have considerable value within the biosphere and will need consideration within legislation and policy.

The landscape approach has many benefits which are brought out in the consultation document. However, a landscape approach does take a broad brush which can neglect micro-habitats or individual species. Including species conservation, and perhaps the older system of species champions would mean that the landscape considerations would be balanced with those of species. It should also be noted that an emphasis on the preservation of current landscapes may limit the removal of poor practices or the increase of woodland or moorland cover. The assessment of landscapes for both ecosystem and cultural/historic benefits need to be balanced.

The principles given in the consultation document for resilience are very useful. The quality and connectivity of habitats is very important and is under increasing threat. The other principle of the extent of the habitat should also be given a profile within the Policy.

These aspects will be competing against pressures from land development particularly in the post-Brexit period. If Wales is to take leadership in Natural Resources Policy it will need to establish guiding principles when dealing with these competing pressures. The replacement for European directives, and the strength and robustness of these replacements in producing

environmental resilience, should be a key part of forthcoming policy formulation.

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**Consultation  
Response  
Form**

Your name: Gwyn Howells

Organisation (if applicable): Hybu Cig Cymru – Meat Promotion Wales

email / telephone number: 01970 625050

Your address: Tŷ Rheidol

Parc Merlin

Aberystwyth

SY23 3FF

**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,
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The key steps that need to be taken in order to deliver on the priority themes and address the key challenges within the consultation to inform the development of the Natural Resources Policy.

Thank you for the opportunity to respond to this consultation. Hybu Cig Cymru - Meat Promotion Wales (HCC) is the industry-led organisation responsible for the development, promotion and marketing of Welsh red meat. HCC's stakeholder representatives implement, on behalf of all Welsh farmers and other key industry participants, a strategic plan to develop profitable and sustainable markets for Welsh red meat to derive benefit for all in the supply chain.

As food producers and custodians of the landscape, Welsh red meat producers not only play a vital role in supporting the rural economy but are also integral to the sustainable management of the land upon which our food and tourism industries rely. Within the Welsh red meat sector's current Strategic Action Plan for the Welsh Red Meat Industry, one of the two strategic priorities for the Welsh red meat industry is to improve production efficiency whilst maintaining the environment and landscape of Wales.

Welsh agriculture contributes £385 million Gross Value Added to the Welsh economy. Agriculture is of huge importance to Wales' rural economy supporting further business and secondary processing in rural areas of Wales. It is the foundation of the food industry in Wales which employs over 222,400 people, with a turnover of £15.5 billion in 2014. The Welsh Government has identified food and farming as a priority sector in Wales, recognising its importance to the country.

Agriculture is key to delivering the outcomes of the Natural Resources Policy effectively, but to achieve this aim it is crucial that farming practices and the efforts made to protect Wales' natural resources work alongside one another. Much of the diversity within Wales is the result of the farmed landscape which has developed over time through generations of farming activity. Agriculture plays a key role in maintaining the carbon stores within the soils. It is therefore important to build upon the techniques of maintaining the land and to seek to enhance how agriculture can continue to contribute to building on Wales' natural resources. It is important for Wales to continue to provide a balance for the working and living landscape in order to maintain its productive capacity alongside safeguarding our natural resources.

The Natural Resources Policy should consider the ways in which agriculture can continue to support the environment but also to maintain its level of production. Policies which aim to protect the natural resources within Wales may present challenges for red meat producers. Livestock play a crucial role in the management of land and policies that present a threat to sheep and beef production could also present not only a risk to individual farm business but to tourism and other allied sectors as well.

Taking into consideration the above comments, innovation and development within the agricultural industry also offer the opportunity to increase the contribution that agriculture can make towards improvements to resource efficiency.

Barriers that need to be addressed regarding the consultation to inform the development of the Natural Resources Policy.

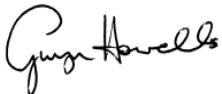
A Natural Resources Policy should ensure that all relevant information is communicated effectively and through the appropriate channels. This may pose significant challenges given the varying industries affected by the policy and the many different methods of communicating messages that are currently deployed.

Implementation of the policy requires a joint industry approach with an understanding of the requirements and risks associated for Wales' natural resources and for the agricultural sector and the other industries identified within the consultation document. Any policy must recognise the production requirements for red meat producers and acknowledge their role in supporting the natural resources within Wales.

The EU referendum result has created considerable uncertainty within Wales and particularly in the agricultural sector, putting businesses under pressure as they cannot plan effectively to ensure their business' future sustainability. Profitable businesses will not only have a stronger ability to increase their businesses efficiencies in regards to maintaining natural resources but are more likely to invest in improving their on-farm efficiencies. These efficiencies would also support the maintenance and sustainability of natural resources on farm and the surrounding countryside.

We hope that these comments are useful in your deliberations and would appreciate being kept informed of any further developments in this area.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Gwyn Howells', with a stylized, cursive script.

**Gwyn Howells**  
**Chief Executive**