

**The National Assembly for Wales' Environment and Sustainability Committee**

**Natural Resources Wales: Annual Scrutiny 2015**



**Submission by  
the Campaign for the Protection of Rural Wales: (CPRW)**

**April 10<sup>th</sup> 2015**



## Natural Resources Wales: Annual Scrutiny 2015

### Submission by the Campaign for the Protection of Rural Wales: (CPRW)

#### Summary

1.1 The Campaign for the Protection of Rural Wales welcomes the opportunity to submit its representation on the performance of Natural Resources Wales for the Committee's consideration.

1.2 CPRW was an organisation that optimistically welcomed and supported the consolidation of the three public bodies whose responsibility it was to manage the various dimensions of the environment of Wales. We anticipated and indeed promoted this change as a means of ensuring a more integrated, sustainable and therefore more effective way of managing the environment in a coordinated manner. We looked forward with enthusiasm to building on the long standing, amicable and forthright partnership relationship which complemented the collaborative working arrangements we had established with NRW's predecessor organisation, the Countryside Council for Wales, on issues of common importance in ways which each organisation pursue its mutual agendas to safeguard and enhance the interests of all Welsh landscape and those of rural areas.

1.3 Regrettably after the first two years of Natural Resources Wales operational existence, the reality of our expectations has proved very different. Contrary to our anticipations, Natural Resources Wales has

- **Chosen to be highly selective in terms of the scope and manner in which it pursues and fulfils the full range of its inherited statutory remits and responsibilities.**
- **Misplaced its ethic of Partnership and collaborative working in favour of approaches driven by selective and mechanistic operational procurement processes.**
- **Become an organisation propelled by political narrative and rather than one visibly championing and defending its statutory remit and responsibilities in an independent and objective manner.**
- **Appeared to have lost its desire to challenge and provide robust, independent and authoritative advice to Government on issues for which it has clear statutory environmental responsibilities**
- **At best lacked consistency and at worst abdicated its statutory role and obligations to be a robust and impartial advisor to Government on key environmental issues and the impacts of development proposals**
- **Failed to establish an emblematic national leadership role as a champion and guardian of the environment and in the context of the Welsh landscapes particular those which are nationally protected and internationally recognised.**
- **Shown little signs of advising, pursuing, and monitoring the implementation of the principles of the European Landscape Convention through its work**
- **Created an indifferent relationship with many environment NGO's and discounted the value of informed challenge and constructive criticism**
- **Created a hierarchical management system which is less approachable and difficult to engage with in an open manner.**
- **Become an organisation dominated by process which is failing to achieve sound and balanced environmental stewardship.**

1.4 We do not see Natural Resources Wales as either the stoic guardian or the progressive ambassadors of the Welsh environment we anticipated, but more an organisation which focusses on an environmental regulatory function and has become a facilitator for a less constrained use of the countryside of Wales

1.5 Notwithstanding this, CPRW recognises there are still individuals within the Natural Resources Wales who strive to maintain the integrity of the environmental ethics of CCW but whose efforts appear to be thwarted by prescribed political agendas, the conformist ethic of the new organisation and an acquiescent leadership attitude.



## Recommendations

In the light of our submission and that of others, CPRW trusts this Committee will strongly recommend that

1. **Natural Resources Wales is subject to a comprehensive and independent audit to establish the extent the organisation is fulfilling the full range of its statutory legacies responsibilities.**
2. **That the current NRW leadership and stewardship role of championing the management of Protected Landscapes in Wales is devolved to an enabling and facilitating “National Landscapes Executive Board”**
3. **Welsh Government establishes an independently chaired National Landscape Advisory Forum.**
4. **The Minister of Natural Resources establishes an autonomous Environmental Assessments and Advisory service, independent of Natural Resources Wales, to provide Government with impartial technical advice and evidence on strategic environmental policy issues and the environmental implications of developments proposals and those land use changes which have sustainability implications.**
5. **NRW is mandated to give greater strategic and operational focus and resources to securing the integrity and wellbeing of Wales’s landscapes and seascapes especially those in Wales’ Protected Landscape areas.**
6. **The Minister of Natural Resources undertakes an independent Inquiry to investigate the processes and probity by which NRW discharges its Statutory Planning functions.**

In recognition of the cumulative implications of these deficiencies;

7. **A comprehensive and independent Inquiry is commissioned to review and establish whether the existing Environmental Governance arrangements in Wales are fit for purpose and meet the competence required to ensure the desirable standards of guardianship and stewardship of all Wales’ environmental resources are achieved.**



## 2. The context for our submission

2.1 The Campaign for the Protection of Rural Wales (CPRW) is Wales' foremost landscape charity. As a campaigning organisation we aim to raise public and political awareness of the value and role of Welsh landscapes as national assets. We believe individually and collectively our landscapes are national assets which contribute not only to the nation's well-being but are to our international heritage. We therefore actively defend the integrity and values of Welsh landscapes and seascapes especially, when they are threatened by inappropriate use or incongruous development.

2.2 Given their role and the benefit landscapes provide, we maintain their responsible management is a matter of public interest and responsibility, especially as they provide the overarching framework within which natural resource management must be creatively but sensitively promoted.

2.3 We believe that when the nation's landscapes and seascapes are responsibly cared for and their management adequately resourced, these assets can deliver the huge range of public benefits and outcomes the Welsh Government seeks in promoting its sustainable development and wellbeing ambitions

2.4 In this context and given its stated purposes, Natural Resources Wales, being the responsible environmental agent of Welsh Government, should be the organisation responsible for safeguarding and defending the integrity of these assets. By implication it should therefore likewise demonstrate creative and positive leadership in delivering this agenda. In so doing one would expect it to pioneer and actively showcase how all Welsh landscapes are sustainably managed. In particular it should have a specific focus on promoting the stewardship of the 25% of Wales which have the finest landscapes and are recognised and designated as being internationally important. (**Appendix 1** highlights the important relationships between landscape stewardship and biodiversity management.)

2.5 CPRW therefore welcomes the opportunity to express its views on how Natural Resources Wales, (our lead public environmental body), has fulfilled this role since its establishment. In particular we reflect on the manner in which the organisation currently exercises and fulfils those statutory landscape stewardship responsibilities it has inherited from its predecessor organisation, the Countryside Council for Wales.

2.6 Regrettably our experiences and evidence demonstrates from a variety of perspectives that NRW is neither adequately fulfilling these inherited responsibilities in the manner expected, nor taking and discharging its role as Advisor on and Advocate for landscape of Wales in a manner which reflects or befits the leadership role bestowed on and expected of it, as the independent body expected soon to fulfil the provisions of the forthcoming Environment Bill.

2.7 We explain our concerns in respect of four separate but inter related issues

- **The Legacy responsibilities of NRW**
- **The Leadership responsibilities of NRW**
- **The Advisory role of NRW**
- **The Guardianship role responsibilities of NRW**



### 3. Evidence to support our opinions

#### 3.1 The Legacy responsibilities of Natural Resources Wales

3.1.1 CPRW has always advocated that Wales' landscapes are the nation's unsung environmental heroes, important not only because of their scenic quality and diversity but because they also provide the invaluable frameworks which inextricably link nature with culture, the past with the present and man with his environment, in a distinctively Welsh way.

3.1.2 Sensitively managed, resilient and healthy landscapes underpin the quality of Welsh life, and the national well-being of Welsh people. They also act as powerful economic and tourist resource for the many who visit and enjoy Wales and provide opportunities to increase public health and wellbeing. Distinctive landscapes are an unmistakable and crucial dimension and should be the quality trademark of the well-being, in 21st century Wales.

3.1.3 This multi-functional and strategic role that landscapes provide is the basis of the European Landscape Convention and was identifiable and strongly traceable through the scope and effectiveness of the Countryside Council for Wales' work. This similar landscape imprint is not characteristic of the profile, policies or priorities of NRW's work.

3.1.4 This view is substantiated by the fact that

- a) NRW's current Corporate Plan makes little reference to its role or intentions in protecting, conserving or enhancing the landscapes and seascapes of Wales.

The only reference to landscapes in their current Corporate Plan (at Page 5) is in respect of NRW's Purposes and reads

*"...that the environment and natural resources of Wales are sustainably maintained, sustainably enhanced and sustainably used, now and in the future",*

NRW emphasises that what it does should be

*"Good for the environment: ecosystems are resilient and secured for the future, wildlife and landscape are enhanced, and the use of our natural resources is carefully managed"*

Thereafter, in indicating its range of roles and responsibilities, NRW cites (at Page 6) its role as

*"Principal adviser to Welsh Government, and adviser to industry and the wider public and voluntary sector, and communicator about issues relating to the environment and its natural resources".*

Apart from these statements of intent there seem to be no other overt recognition, or any indication in any of its major work streams, of NRW's intentions or priorities with regards to the landscapes and seascapes of Wales,

- b) NRW's Operational Business Plan includes no reference to or provision for any priority to be given to the stewardship of landscape and seascapes.
- c) Even more significantly, this same Business Plan makes no direct reference to the importance of NRW's custodial role in respect of the 25% of the land area of Wales which is designated Protected Landscapes.

3.1.5 To reinforce this point we have identified in **Appendix 2**, an extract from a document CPRW produced in October 2013 highlighting the issues and areas of work we expected NRW to brigade and proactively engage in pursuing.

3.1.6 Of the eight thematic areas we expected NRW to engage in, there still appears to be no obvious evidence to indicate that either the Board or the Executive Directors of NRW has deemed it appropriate to engage in at least **six of them**.

## **Conclusion**

3.1.7 CPRW considers that despite having inherited the legacy of all the landscape duties and responsibilities previously promoted by its predecessor organisation the Countryside Council for Wales, these are not now being pursued in any systematic or convincing manner by Natural Resources Wales.

### **Recommendation 1**

**Natural Resources Wales is subject to a comprehensive and independent audit to establish the extent that it is fulfilling the full range of its statutory legacy responsibilities.**



## 3.2. The Leadership role and responsibilities of NRW

3.2.1 In CPRW's view it is essential that Wales has a public body which provides leadership for and champions the values of all our landscapes and seascapes. This body must also vigorously protect the integrity and the multitude of values these assets provide and guide their use in ways which retain the diversity and resilience of their character.

3.2.2 By definition any such organisation charged with safeguarding the natural resources of Wales, must demonstrate creative and proactive leadership and promote responsible landscape and seascape stewardship by example. When those charged with these responsibilities do not fulfil these expectations at either an Executive or professional level or worst still do not recognise the immeasurably contribution Welsh landscapes make to the public's well-being, then it is clear to us that organisation is not only failing the nation but also abdicating its legal duties and public responsibilities.

3.2.3 In terms of fulfilling a leadership role in respect of Welsh landscapes/ seascapes and in particular in respect of promoting the interests of the eight Protected Landscapes (National Parks and AONBs) we would therefore expect Natural Resources Wales to be undertaking the following range of benchmark functions as their norm:

- Visibly demonstrating and regularly reporting how it is furthering the principles of the European Landscape Convention in respect of all landscapes and seascapes and in particular in the context of those eight internationally important designated landscapes which are protected.
- Providing regular advice to Welsh Government on matters relating to the furtherance of the landscape stewardship objectives in general and the Purposes of nationally designated landscapes and seascapes in particular.
- Recognising the need for their activities to reflect the close management relationship which must exist between the stewardship of Wales' natural, cultural and its heritage assets
- Keeping under review the Protected Landscape designation system, bringing forward new areas for designation and reviewing the boundaries of existing Protected Landscapes
- Securing adequate funds from Welsh Government to further the purposes and activities of Wales' Protected Landscapes
- Regularly reviewing and monitoring the performance of the Protected Landscape system and the leadership achievements of those responsible for these designated areas
- Developing a collaborative high profile Wales Landscape Forum to actively engage those bodies and organisations who have a direct involvement in promoting progressive landscape stewardship approaches.
- Developing outward facing collaborative partnership arrangements which secure the responsible stewardship of landscapes at all scales and in particular promote the innovative sustainable management of Protected landscapes

- Promoting research and sharing knowledge about new approaches to natural resource management in and beyond designated areas
- Increasing public awareness and understanding of benefits that landscapes provide and in particular the special qualities of our nationally important landscapes
- Establishing and maintaining International links with other Protected Landscapes in Europe and beyond to share knowledge and experience of good practice

## Conclusion

3.2.4 In reviewing the range and nature of NRW's current activities and proposed future priorities for action, CPRW finds it difficult to establish how these objectives are being fulfilled and sees little evidence to suggest that the majority of them are being addressed in a positive or proactive manner.

3.2.5 We are similarly concerned that the heritage and cultural dimensions and associative traditions of the Welsh environment and the significant contribution these make to the concept of "Sense of Place ", do not appear to register or feature sufficiently in the ethic or priorities of NRW's priorities.

### Recommendation 2

**NRW national leadership and stewardship role and its responsibility to champion the management of Protected Landscapes in Wales, is devolved to an enabling and facilitating "National Landscapes Executive Board"**

### Recommendation 3

**Welsh Government establishes an independently chaired National Landscape Advisory Forum.**





### 3.3 The Statutory advisory role of NRW

3.3.1 NRW is a Statutory Consultee under the provisions of the Town and Country Planning legislation and also a Statutory Advisor to Welsh Government in respect of all the responsibilities it has inherited from its former legacy organisations.

3.3.2 Given its independent role, it is therefore incumbent upon NRW to undertake these functions in a comprehensive, impartial and unfettered manner.

3.3.3 In so far as being able to demonstrate that it is undertaking these functions in an accountable manner which also reflects due diligence and a recognition of all the relevant landscape and environmental conservation issues, CPRW has serious reservations that this is indeed the case with NRW. The following examples provide we believe sufficient cause for concern to challenge the probity of NRW *modus operandii*

3.3.4 We cite by way of an example and in respect of its deficiencies to fulfil its landscape advisory role appropriately, NRW's failure to respond to and express clearly its opinions as to whether National Park Authorities in Wales should retain their planning responsibilities.

3.3.5 We note that when this issue was raised in the Welsh Government's "Positive Planning" consultation document<sup>1</sup> as to whether Park Authorities should retain their planning powers, NRW responded as follow

#### Question 24

***Do you think that a National Park Authority should continue to have responsibility for planning in their area?***

#### Comments:

*The evidence base, Delivery of Planning Services in Statutory Designated Landscapes in Wales (Land Use Consultants, October 2012) and analysis of the Planning Performance Indicator Dashboard indicates that the NPA Planning Service is comparable to other local planning authorities. The Commission on Public Service Governance and Delivery highlighted the need for service delivery to reflect the direct legislative and functional requirements of an administrative area for National Parks and did not identify a convincing case for transferring their functions to local authorities whilst emphasising the importance of collaboration and partnership with local authorities.*

*WG propose to undertake a Governance Review of National Parks in Wales, commencing in the autumn. The issue of whether or not National Park Authorities should continue to have responsibility for planning its area should be taken forward and considered within the overall context of the proposed Governance Review*

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<sup>1</sup> NRW Consultation Representation number WG 20088230, December 2013- February 2014

3.3.6 It is clear from this response, that despite NRW being the Government advisor on landscape and development and land use matters in Protected Landscapes and the need for it to provide clear and definitive advice to Government regarding the long term approaches which are required to maintain the integrity of Wales most important landscapes, the organisation made no attempt to provide a clear objective value judgement on this matter but merely fudged the issue.

3.3.7 Equally when the Planning Bill was tabled at Stage 1 of the legislative process and scrutinised by the Environment and Sustainability Committee, despite the fact that the Minister had indicated that he was minded to introduce an Amendment at Stage 2 to change the planning status of all Wales National Parks, NRW yet again chose not to provide any clear advice or evidence to Government on the merit of such a proposal, despite the outcomes of various WG consolation documents having indicated that the status quo was desirable .

3.3.8 In a strategic context we are therefore astonished, that the body with direct responsibilities for the future wellbeing of the landscapes and amenity of Wales' finest landscapes has abstained from commenting on this crucial issues. We contend NRW has failed to fulfil what we believe to be one of its primary and statutory Advisory functions.

3.3.9 We therefore can find little if any evidence to confirm that NRW

- Is providing clear, independent, informed and publically accessible advice to Government on strategic landscape issues especially those affecting Wales' Protected Landscapes
- Has established appropriate mechanisms to assess how the European Landscape Convention is being implemented in Wales
- Has given no indication of how it will continue to monitor and report on the manner in which the Convention is being implemented in Wales

## **Conclusion**

3.3.10 Ostensibly and unforgivably Natural Resources Wales appears to have abandoned its desire to maintain the Countryside Council for Wales' legacy of providing robust and proactive advice to Government aimed at safeguarding the future integrity of Wales' landscapes. It appears now to be giving scant / selective regard to its strategic responsibilities in this respect.

3.3.11 As the organisation responsible for implementing the spirit and principles of the European Landscape Convention, we again highlight the fact that Natural Resources Wales appears to be merely paying lip service to its statutory landscape responsibilities.

#### **Recommendation 4**

**The Minister of Natural Resources establishes an autonomous Environmental Assessments and Advisory service, independent of Natural Resources Wales, to provide Government with impartial technical advice and evidence on strategic environmental policy issues and the environmental implications of developments proposals and those land use changes which have sustainability implications.**

#### **Recommendation 5**

**NRW is mandated to give greater strategic and operational focus and resources to securing the integrity and wellbeing of Wales's landscapes and seascapes, especially those in Wales' Protected Landscape areas.**



### 3.4 The Guardianship role and responsibilities of NRW

3.4.1 Natural Resources Wales describe on its website <http://naturalresources.wales/about-us/what-we-do/?lang=en> amongst its range of roles and responsibilities, its Guardianship role as :

- **Adviser:** Principal adviser to Welsh Government, and adviser to industry and the wider public and voluntary sector, and communicator about issues relating to the environment and its natural resources
- **Regulator:** Protecting people and the environment including marine, forest and waste industries, and prosecuting those who breach the regulations that we are responsible for
- **Designator:** for Sites of Special Scientific Interest – areas of particular value for their wildlife or geology, Areas of Outstanding Natural Beauty (AONBs), and National Parks, as well as declaring National Nature Reserves
- **Statutory consultee:** to some 9,000 planning applications a year
- **Evidence gatherer:** monitoring our environment, commissioning and undertaking research, developing our knowledge, and being a public records body

3.4.2 NRW role as “Statutory Consultee” on planning application affecting the environment of Wales is a crucial role in safeguarding the inherent value, integrity and resilience of Wales’ landscapes as well as the diversity and quality of their natural and cultural assets and the benefits they provide. This fundamental role in guiding change and defending the environment is fundamental to the organisation’s *raison d’être*.

3.4.3 Whilst it is appreciated that NRW face a significant task in responding to the 9000 development proposals which it indicates it is required to comment upon, it is clear that in a number of very high profile instances, the organisation has changed or it appears significantly amended its response regarding the landscape and / or environmental impacts of certain developments

3.4.4 It is common knowledge that the Countryside Council for Wales vigorously opposed the Circuit for Wales planning application in its twilight period. Prior to this application being determined by the relevant Minister but after the establishment of Natural Resources Wales, whilst the physical circumstances and technical aspects of the application did not change, Natural Resources did however changed its initial position in respect the impacts and hence acceptability of this proposal.

3.4.5 It is clear and we believe that other environmental NGOs will provide information which clearly indicates that this change in position by NRW was instigated by the Senior management, if not the Chief Executive of NRW, at the behest of the relevant Minister. If this is the case and the information provided by others demonstrates this is so, then this represents a serious and indefensible dereliction of NRW’s statutory responsibilities to protect the environment of Wales. On this count alone the Committee should require the Minister to take immediate measures to sanction those responsible in NRW.

3.4.6 We likewise believe that the same interference took place in the context of the initial representations which were made by CCW's in respect of their opposition to a number of the wind farm proposals which were subsequently the subject of the Mid Wales Joint Planning Inquiry. Once again the strength of the eventual representation made in respect of these proposals from an environmental perspective by NRW changed and we are lead to believe watered down on the instruction of Senior management in NRW.

3.4.7 Both these instances if correct and substantiated, they highlight the fact that those responsible in NRW, were either purposely negating their responsibilities as statutory consultee or deliberately acquiescing to political pressure. Given the supposed independent and impartial nature of the professional judgement NRW is required to provide on the environmental impact of developments, the adulteration of any statutory responses in this manner is both deplorable and wholly indefensible. We therefore respectfully request the Committee to establish the reality of these circumstances in all these cases and any others, when scrutinising National Resources Wales' Chief Executive

3.4.8 In so far as NRW having not fulfilled its landscape and nature conservation guardianship role adequately, CPRW would also further cite the example of the Flood Alleviation works which was recently undertaken in Llanwrst and highlighted in the media. We cannot imagine how such a proposal could have been granted consent by NRW in such an obtrusive and destructive manner.

3.4.9 We also believe the over engineered and unsympathetic Flood Alleviation works currently being undertaken in Dolgellau on the Afon Wnion by NRW, may well also be destined to fall well short of the standards expected of the nation's primary environmental organisation in the Conservation Area of a historic market town in a National Park.

3.4.10 We find it unacceptable that the organisation charged with and publically promoting a Catchment based ecosystems approach to the management of water resources, despite being challenged as to the legitimacy of their proposed hard engineering solution, persisted with their preferred combination of an over engineered concrete / stone faced retaining wall and canalised river solution. The justification for perusing this option we were told was because the money to undertake this scheme had fortuitously become available and needed to be spent quickly!

## **Conclusion**

3.4.11 CPRW is highly concerned that despite the professional efforts of many NRW's staff, the importance of NRW's environmental guardianship role is being selectively interfered with for motives other than those which reflect the organisation's statutory responsibilities and stated function

### **Recommendation 6**

**The Minister of Natural Resources is required undertake an independent Inquiry to investigate the processes and probity by which NRW currently discharges its range of Statutory Planning responsibilities.**



#### 4 NRW Partnership ethic

4.1. NRW web site once again states that one of its key functions is to be a

***Partner, Educator and Enabler: key collaborator with the public, private and voluntary sectors, providing grant aid, and helping a wide range of people use the environment as a learning resource; acting as a catalyst for others' work***

4.2 CPRW totally supports this objective, but again our experience reflects the fact that the relationship which we built up with CCW over more than 15 years has changed dramatically over the last two years.

4.3 Our previous open and frank working relationship with CCW was one which could best be described as that of a "Critical friend". We now find that this has changed significantly. Whilst working well with individual officer in the NRW, CPRW and in particular through my role as Director, I have noticed a significant change in the formal nature of our relationship with the organisation.

4.4 The culture of "constructive challenge" is not well received by Senior Management in NRW, to the extent that I have been directly and forcefully criticised by the Chief Executive of NRW for publishing a manifesto style document entitled "Why Landscapes Matter"<sup>2</sup> (See Appendix 2) which outlines in our view, the issues which NRW should have focussed upon and been promoting soon after it was established.

4.5 CPRW does not consider such a negative reaction is either conducive to collaborative working or helpful in achieving the common goals which our two organisations seek to promote.

4.6 In the light of this and having benefitted from over 15 years of grant aid funding from CCW through its Partnership programme, we are not surprised that when this last tranche of funding came to an end in April 2015, this 3 year Partnership funding Programme also ceased and has not been renewed.

4.7. CPRW along with a great many other organisations in the landscape sector and beyond, therefore treats with some scepticism the sincerity of NRW stated function as

*A key collaborator with the public, private and **voluntary sectors, providing grant aid, and helping a wide range of people use the environment as a learning resource; acting as a catalyst for others' work***

4.8 We regret the fact that the resources made available to drive the partnership ethic which existed in CCW has evolved into a fund which procures cut price work which NRW prescribes from "partner organisations" on a mechanistic, competitive and unrealistic funding basis. We believe a number of other environmental NGOs feel strongly about this issue and have submitted detailed evidence to this Committee regarding this change in attitude and behaviour by NRW.

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<sup>2</sup> "Why Landscapes Matter" CPRW, October 2013

## 5 Our overall conclusion

5.1 The range and detail of our submission provides the Committee we trust, with a helpful and informed insight into the significant failings which CPRW believes characterise the manner in which NRW is currently fulfilling the statutory landscapes remit it has inherited.

5.2 In recognition of the significant cumulative implications of these deficiencies, CPRW believes:

### **Recommendation 7**

**A comprehensive and independent Inquiry is commissioned to review and establish whether the existing Environmental Governance arrangements in Wales, are fit for purpose and meet the competence required to ensure that the desirable standards of guardianship and stewardship of all Wales' environmental resources is achieved**

## Appendix 1

### **The relationship between Landscapes and Biodiversity in promoting creative approach to Natural resource management**

For some time there has been an obvious difference of attitude and understanding as to how the responsible stewardship of Landscapes and Seascapes equates with the protection, restoration and enhancement of biodiversity, within the context of an ecosystem approach.

Many see biodiversity (in combination with the natural process which take place in the environment), as the driving force and indeed the underlying and foundation approach which should be pursued to ensure effective and sustainable natural resource management.

Whilst the management of biodiversity is undoubtedly important, the need to create resilience and integrity in ecosystems relies on more than just this single thematic approach. Viewing biodiversity as the cardinal principle for implementing a sensible approach to natural resources management CPRW believes is both short sighted and indeed incorrect.

Any approach to natural resource management must recognise not only the importance of ecological integrity and connectivity but also overarching need to maintain landscape integrity and connectivity. Only by doing so, can the various palimpsests of human influences, imprints and associations, which have been created over time and which create the unique identity or “sense of place” of a location be accounted for. These relationships provide the critical dimensions and context which ultimately link nature and man, the tangible with the intangible and the past with the present / future.

The reversal of the fragmentation of landscape character is every bit as important to rectify as is the recovery of species and habitats.

To suggest that this can be represented merely by referring to and using the phraseology “working at a landscape scale” is again an incorrect interpretation and inappropriate use of the term landscape.

Landscapes exist at all scales and not just on a big scale. The crucial requirement is that they work collectively in a readable and coherent way and not in a dysfunctional manner which is increasingly the case. The main reason for biodiversity failure is often the loss of the correct **landscape context** within which species exist and ecosystems operate.

The following diagram and approach to the characterisation of landscapes illustrates this principle perfectly.



## Landscapes as the architecture within which an ecosystems approach should be promoted



Natural Resource management should not simply be confined to managing biodiversity any more than it should to carbon management or specific species protection but must be based upon the principle of managing those elements of the environment which define **its functional integrity and character** and in ways which ensure these intrinsic values and inter relationships are maintained and enhanced and hence the functional resilience of all these elements are safeguarded.

Viewing our environment in this way therefore means that the benefits of

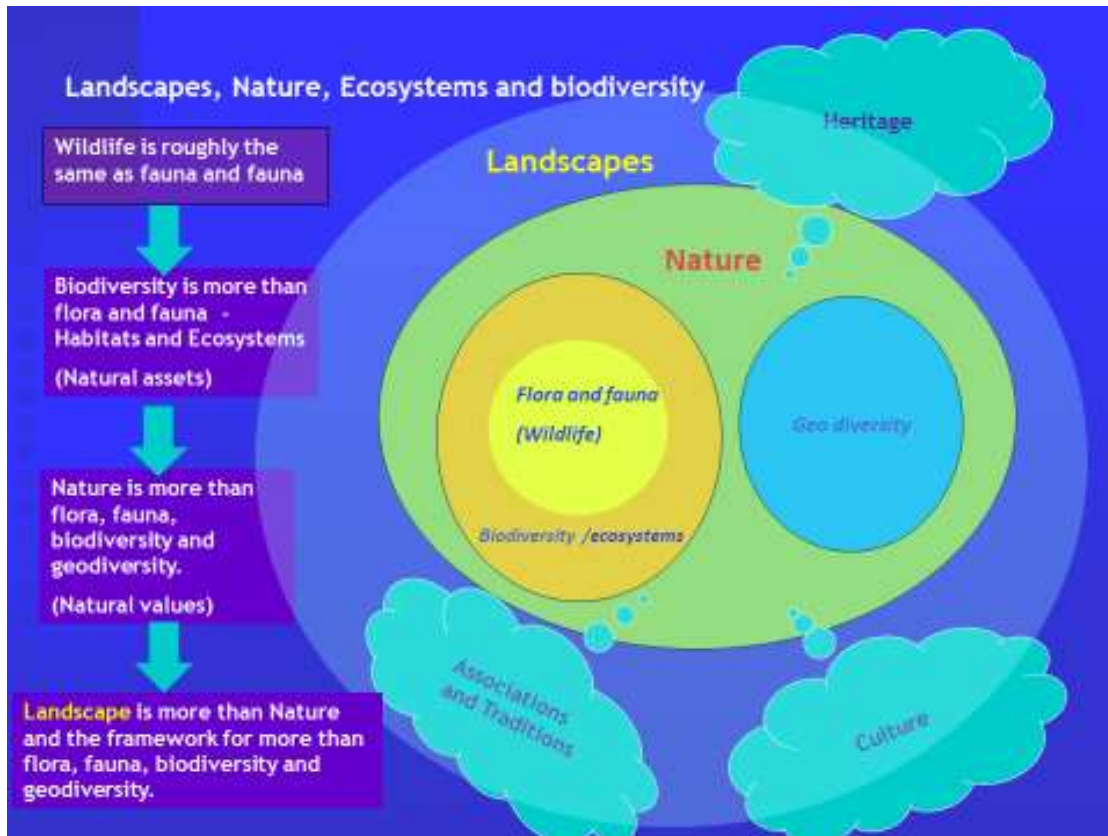
the whole will always be greater than those of any of its individual parts.

Natural Resource Management should provide the means and NRW the mechanisms to coordinate the management of individual landscapes in a manner which ensures that all spaces and resources work together as a coherent network,

Protected Landscapes and Areas ( in particular but not exclusively) should therefore be the dynamos of an outward facing Natural Resource Management approach which reconnects the fragmented elements of our current landscapes and provides successfully integrated biodiversity, heritage stewardship, access, education and community led approaches to environmental responsibility and stewardship.

This is exactly why the much ignored European Landscape Convention provides not only such an important overarching framework but the sensible architecture for the implementation of a Natural Resource management approach. Within this approach the management of biodiversity is a crucial constituent part and not the determinant of it.WEL.

The following diagram hopefully explains these relationship neatly



### A Landscape approach to sustainable Natural Resource management

It is therefore clear from the above diagram that no matter where they are, what their size or shape, landscapes are the canvas on which we build and live our lives and the pillars which underpin our national wealth. They not only link the wellbeing of Welsh people but unite us with our culture and natural heritage in so many distinctive and fascinating ways. They are the foundations on which our inheritance is built.

Accepting therefore that landscapes are more than just views and their qualities are the product of values accumulated over long periods of time, it is clear that those management approaches which create places with a positive character and where change is responsibly directed, are those we need to duplicate.

Adopting a “Landscape approach” to the management of our natural and cultural resources, so that the quality of the places which surround us and provide for our needs are maintained, is the only way this can happen.

Wherever they exist landscapes must be recognised as valuable assets, remain resilient, adaptable and the quality of their constituent assets (including biodiversity), must be of such a standard that any change protects these critical values and the resilience of the range of services they provide.

## Appendix 2

### Extract from CPRW statement: “Why Landscapes matter” October 2013

To fulfil this ambition, the Welsh Government, Natural Resources Wales and those making decisions affecting Welsh landscapes should:

- Champion increased awareness of the European Landscape Convention and report more comprehensively on its effective implementation in Wales.
- Adopt a long term vision which safeguards and enhances the heritage of all Welsh landscapes and seascapes.
- Promote a “landscape approach” to enhance the distinctiveness, value, resilience, and public appeal of our landscapes and their associated natural and heritage assets.
- Produce inspiring and creative landscape planning and management guidance.
- Work energetically with partners and stakeholders to increase the opportunities landscapes and seascapes offer for public enjoyment.
- Work collectively to unify the stewardship of the land and sea within the Living Wales programme.
- Explain if or how the further designation of Wales’ finest landscapes and seascapes should occur.
- Secure the resources necessary to manage Wales’ iconic landscapes to standards which reflect their national status and public value.
- Assist Welsh Government prepare and publish a National Resource Management Plan and its local equivalents to guide the delivery of successful frameworks of action

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April 10<sup>th</sup> 2015