



Campaign for the Protection of Rural Wales
Brecon and Radnor Branch
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Brecon & Radnorshire and Montgomery Branches of CPRW:

Response to Welsh Government Natural Resources Policy Consultation

CPRW is Wales' foremost countryside protection charity, founded in 1928. It aims to increase public awareness of the importance of landscapes and seascapes. It promotes their responsible care and use. It defends the qualities that make rural Wales special. It seeks to influence decision makers to guide responsible change and oppose them when they don't. It promotes landscapes as inspiring places for learning, personal development and well-being and it celebrates Wales' heritage of landscapes, culture and rural life.

Brecon & Radnorshire and Montgomery Branches are the two Powys branches of CPRW.

Like our pan-Wales CPRW charity, we welcome the opportunity to respond to the Natural Resources Policy consultation (NRPC) which has profound implications for our charitable purposes. We endorse the general response from the National Director of CPRW which has also addressed some of the issues we raise. We are grateful to you for also considering our own, local response which is presented in different terms and informed by our local experience of Natural Resources issues in Powys.

1. OVERVIEW

On a practical level, it would have been helpful to number the pages (we use pdf page numbers below) and to clarify some of the vaguer optimistic statements such as those at the bottom of pdf p.14 and pdf p.15.

'High quality natural resources also play a key role in supporting key sectors, such as in the case of water, farming, fisheries, energy, recreation and tourism and can drive further opportunities for local businesses in areas like carbon through payments for ecosystem services (PES).'

'Good public path networks could also increase the range available to pollinators'

Overall we find the NRPC too generalised and too unwilling to face the real challenges of drawing up and implementing a Natural Resources Policy fit for the long term Sustainable Management of Natural Resources (SMNR). We consider that the seven goals of the Well-being of Future Generations Act (WbFGA) allow such broad interpretation that the relation between the Act and the NRPC easily becomes a matter of random search for "Help! What can we put in this box?" rather than a thorough consideration of the complex relations involved and the real challenges for a plan of action.

2 PRIORITIES

We have reviewed the recent State of Natural Resources Report (SoNaRR) which describes itself as **the evidence base for the NRP**. We regard this document as a courageous first attempt at an honest account of the state of current evidence about the state of Natural Resources (in the widest sense) in Wales, with useful bibliographic sources. The SoNaRR contains the laudable commitment to use the exercise of producing this report for laying out the ground for a more ambitious and more refined report in 2020.

While the SoNaRR is extremely welcome, we note that, as the analysis gets further removed from the evidence base and more integrated with the WbFGA goals, it also gets more difficult to translate into effective policy. This is because “ecosystem services” actually derive from wider ecosystems and some “ecosystem services” can only be exploited by further degradation of other “ecosystem services”.

By and large, the economic exploitation of natural resources can be assigned monetary value (as quoted in the NPR pdf-p.6) whereas other human gains or losses and biodiversity advantages or disadvantages can not. As SoNaRR says (Ch.5 p.11) “*we still lack quantitative data that would allow us to link current biodiversity status and trend data with the delivery of ecosystem services*”. The same is true of the aesthetic pleasure and general enjoyment and educational gain people derive from their landscapes and natural surroundings. These gains apply *par excellence* to residents, whose well-being is at stake, although only tourists are “monetised” .

There is a serious risk that services for which there is no clearly definable market economic value will be undervalued in a PES “payment for ecosystem services” system, firstly, because we do not understand enough about ecosystems to recognise their true value and, secondly, because low values will suit financial budgets and commercial interests.

We consider it a pity that the NRP document builds on the previous interim 2015 Natural Resources Policy Statement rather than directly on the more complete and recent evidence base from SoNaRR which includes the State of Nature (Wales) information. We further regret that the seven “challenges” of the 2015 Statement have been translated into just three “opportunities” or “priority themes”:

- Accelerating green growth
- Delivering nature-based solutions
- Taking a place- and landscape-based approach to improve well-being

without any clear idea of how these might be translated into policy, resourced in terms of finance and expertise, or implemented to tackle “*the root causes of unsustainable trends*” (NRPc pdf p.8).

Place and Landscape

While we warmly welcome the principle of a “*place and landscape*” approach, closer reading leaves us concerned that the report does not actually have the common understanding of “*place and landscape*” in mind. We consider that the CPRW and public understanding of “*landscape*” is based on the visual, sensory and cultural experience of our unique and varied Welsh landscapes both inside and outside of specially designated areas. These are the qualities and “*sense of place*” which LANDMAP classification has attempted to capture for policy and planning purposes through its five landscape aspects. NRPc says “*there is a clear link between Wales’ natural resources and Wales’ reputation as a high quality international tourist destination. The historic environment also draws many visitors into Wales and many of Wales’ most beautiful landscapes*”

are also rich in the remains of previous human activity". However, the document does not reveal any commitment whatsoever to maintain or enhance these landscapes.

Further on in the NRPc (pdf p.15) working at a "landscape scale" seems to mean a combination of addressing natural resource issues on a broad ecosystem basis, as presented in SoNaRR Ch. 3 (e.g. woodlands), and in appropriate areas (e.g. river catchments). The vague statement that "As opportunities for spatially targeted actions to build healthy resilient ecosystems that deliver key ecosystem services are identified, there will almost certainly be a strong correlation with priority habitats and species" suggests there has been no rigorous thinking through of Priority 3 in terms of either landscape, biodiversity or concrete policy.

We consider that the NRPc implies a high risk that Welsh landscapes will continue to be subject to unrestrained degradation by inappropriate and non-sustainable development. These landscapes are more than an important healthy opportunity for outings for nearby urban populations: they embrace 90% of Wales, are the setting for the Welsh rural population who also have WbFGA rights, and are a unique but fragile asset for the valuable tourist economy and future generations.

Biodiversity

We are no less concerned by the relegation of "Biodiversity and Resilience of Ecosystems Duty" to a subsection (pdf p.12) without making it clear that the Welsh Government itself is the over-arching responsible body for this duty. The Welsh Government's role is presented as providing a "platform" for others (principally LPAs) to report their successes but not their failures. In our experience, LPAs simply do not have the expertise, finance or human resources to integrate this holistic duty into their activities. Powys, for example, has no landscape officer and one ecology officer and has to buy in outside services – and then only when absolutely essential. At present, in spite of the duty imposed by recent legislation to work towards the Water Framework Directive goals, our LPA, which receives statutory advice from NRW, is repeatedly failing to protect designated water-courses from pollution as a result of inappropriate agricultural development.

This lack of expert staff does not bode well for any partnership work on a local Area Plan or local Well-being Plan, based on detailed local knowledge, designed to improve the disastrous situation described in SoNaRR, for example:

- *90% of semi-natural nitrogen sensitive Welsh habitats are subject to nitrogen deposition in excess of critical load limits which impacts on the health and resilience of ecosystems and biodiversity (NRPc).*
- *The condition of SAC and SPA species features on sites in Wales, as reported in 2013, remains mostly unfavourable, with the exception of birds and mammals. Between 2002 and 2008 fewer than half of the species on the interim Section 71 list were considered to be stable or increasing (NRPc).*
- *It is fair to say that when it comes to our consideration of soil management, there are gaps across the board in the current regulatory system...the health and resilience of our ecosystems is being compromised. This includes targets not being met or 'limits' in danger of being breached (SoNaRR ch.6 p.23).*

3. BARRIERS

General Approach

We appreciate that the NRP must find a way to integrate guardianship of ecosystem assets and Welsh landscape with economic policy and human well-being. We underline the SoNaRR reminder that the

guardianship duty does not mean maintaining the status quo: it means reversing adverse trends and enhancement. We also appreciate that the NRP must be a positive document, setting out opportunities for improvement on all these fronts. However it should not be an unrealistic document which ignores fundamental issues and concentrates on easy targets and partial, cherry-picked solutions. Conservation and development can only be reconciled for the well-being of current and future generations if a balance is achieved and we do not see this reflected in the NRPC. This requires a methodology for looking at the evidence as honestly and objectively as the current state of evidence allows. Long term impacts must be compared with short term impacts and the full range of positive and negative ecosystem and economic impacts must be taken into account.

Failure to explore implications:

We note that the NRPC is reluctant to spell out some of the SoNaRR findings about impacts of intensive farming with need to be addressed both for the long-term safeguarding of soil quality and security of food production and for biodiversity. We also note that both SoNaRR and the NRPC fail to explore the ecosystem impacts of various types of renewable energy development, particularly failing to balance the real ecosystem costs and negative well-being impacts on Welsh populations. Some of these are opportunity costs of land use, preservation of carbon reserves, biodiversity of uplands, pollution risks, and landscape impacts. We trust that in drawing up Area Plans in collaboration with local stake-holders, NRW will be open to local concerns about how truly resilient systems can be best achieved. We consider that these failures are inconsistent with the *“sustainable development principle”* as set out in the Well-being of Future Generations Act 5(2) (a) & (b).

Resource deficits

We have a broad concern about resources, both human and financial. From a general public point of view, the concept of ‘ecosystem services’ is remote from most Welsh people’s daily concerns which are:- finding a rewarding, meaningful life, gaining a living, caring for family and friends and maintaining physical and mental health. There is a huge public understanding gap which extends to the crucial agricultural sector and local government. This can only be addressed by a mixture of education, public participation and a more appropriate regulatory regime.

Wales has powerful, newly-devolved functions but at the same time faces loss of a European market with Brexit and suffers continual outward migration of highly educated and skilled people of working age and inward migration of retired people. Financial cuts ensure that the experience and skills of LPA staff are bound to decline in inverse relation to the complex new duties placed upon them.

We would have appreciated clearer acknowledgement of these challenges and a discussion of resources both financial and human, including the need to incorporate education at all levels:- schools and further education, landowners and decision-makers.

Clear Intention to Implement Relevant Policy

The Welsh Government takes pride in its international recognition as an exemplar of natural resource management (Ministerial Foreword, NRPC pdf p.5). Given this, we would expect the NRPC to provide some indication of how the regulatory regime might be strengthened to protect ecosystems and well-being by controlling misuse of land, emissions and waste by devising ways of setting more appropriate limits, “making the polluter pay” and establishing proper and proportionate new habitat creation schemes to compensate for development. In addition, we do not share the Minister’s confidence that extant Welsh legislation, will cover all the provisions of European environmental regulation (NRPC pdf p. 5) post Brexit.

Research

We consider that a clear acknowledgement of the need for basic scientific research should be part of this report, together with how the WG, NRW and the further education sector can collaborate to take this forward.

SoNaRR has usefully attempted to rate the confidence levels for the information providing the evidence base for this report. It is notable that SoNaRR has had to rely heavily on general UK sources and on some very out-of-date sources. In many instances there is no proper evidence base for Wales – either because none has been researched or because the Welsh data collection is methodologically unsound. Without going into specific details, a review of the “medium” and “low” confidence levels in the two annexes (Confidence Methodology and Record of Confidence Assessments) demonstrates this.

It is particularly worrying that the key resilience summary table in SoNaRR Ch. 3. *Summary of extent, condition and trends of natural resources and ecosystems in Wales*, which provides the immediately non-technical accessible core evidence base for NRPC, is only assigned ‘moderate’ confidence. Given the dates of some key sources, for example: *Blackstock TH, Howe EA, Stevens JP, Burrows CR & Jones PS. 2010. Habitats of Wales: a comprehensive field survey, 1979-1997. Cardiff: University of Wales Press, Cardiff.*, the state of Welsh ecosystems is almost certain to be significantly worse than portrayed.

We would like to have seen a government with devolved planning functions recording its responsibility for research and monitoring of Welsh biodiversity and ecosystems in keeping with the 4(e) of the Environment (Wales) Act duty to “take account of all relevant evidence and gather evidence in respect of uncertainties”.

Public Involvement

Two other objectives (besides providing an evidence base) in the SoNaRR are to:

- Inform area statements
- Provide a platform for collaboration and engagement.

These are reproduced in NRPC. We would have liked more information about the development of Area Statements and the role of Public Service Boards as described in the Well-being of Future Generations Act and we seek reassurance that independent stakeholders such as ourselves and the Wildlife Trusts will have a voice in the management of our local landscapes and eco-systems.

Scrutiny and best practice

NRW is not independent of the Welsh Government and, as many stakeholders such as ourselves have frequently commented, this makes for conflict of interest between Welsh Government economic development policy and landscape and biodiversity conservation (resilience) goals.

We were extremely pleased to see the Paper (**NRW B (O) 31.13**, presented to the NRW Board Meeting on 4.9.13), proposing an Independent Science Advisory Committee. However we cannot find any evidence that such a committee has been appointed. The only body founded to provide independent scientific advice to the Welsh Government appears to be confined to human health issues: we are also aware that a National Infrastructure Commission is proposed. We can find no evidence of university level training in biological or physical sciences amongst Welsh Cabinet Ministers and we believe that the proportion of NRW Staff with university level scientific backgrounds, including post-graduate experience is declining (although we stand to be corrected).

We strongly recommend that an **independent Scientific Advisory Committee** of high-calibre scientists is appointed to advise NRW. This would help ensure current best practice in keeping with highest scientific standards in the management of our vulnerable and deteriorating natural resources and ecosystems. We

trust that the Welsh Government would take full account of such advice.

A handwritten signature in black ink that reads "Christine Hugh-Jones." The signature is written in a cursive, flowing style.

Dr Christine Hugh-Jones

Secretary: Brecon and Radnor Branch