

**NATURE RECOVERY PLAN  
Natural Resources Wales - Consultation Response  
3<sup>rd</sup> December 2014**

**Introduction**

Thank you for consulting Natural Resources Wales on the draft Nature Recovery Plan. We welcome this development and many of the proposals within it. We are pleased to see that many of our previous comments are reflected in the current version. We do, however have a number of comments which we hope will help to improve the focus, detail and achievability of the Plan

The purpose of Natural Resources Wales is to ensure that the environment and natural resources of Wales are sustainably maintained, sustainably enhanced and sustainably used. Natural Resources Wales works as a regulator, partner and advisor to businesses, non-governmental organisations, local authorities and communities to help deliver Welsh Government and European Union policies and priorities. We take an ecosystem approach to promoting integrated natural resource management that delivers social, economic and environmental benefits to the people of Wales.

Set out below are the key messages contained in our response. Our response to the specific questions is set out in Annex 1. Annex 2 contains some specific comments on the text within the plan.

**The Key Messages:**

1. The consultation document reads as a Nature Recovery Strategy not a Plan: it sets out strategic direction and action rather than a detailed action plan. As such it needs to clearly signpost the emerging legislative programme and other delivery and funding mechanisms to ensure its success.

**2. Integration**

Biodiversity underpins a healthy, resilient environment and is affected by a complex range of issues. Policy integration is essential to reverse biodiversity loss and deliver ecosystem services, but this is also a key challenge. The Nature Recovery Plan should be the strategy that sets out how Wales will address this challenge of integration across the range of potential delivery mechanisms.

It is important to set out where plans like this sit in the hierarchy of strategy and delivery to ensure an integrated approach to Natural Resource Management.

The Well-Being of Future Generations Bill, the Environment and Planning Bills and the National Marine Plan will all have a significant role in improving integration. The Nature Recovery Plan should not run parallel to these processes but instead should seek to influence and work through all relevant policy areas and delivery mechanisms. Appropriate measures developed to report on the Nature Recovery

Plan should be adopted into other policies and reported as part of the State of Natural Resources Report (SoNaRR). In this way, nature recovery is an integral part of the national policy priorities on integrated natural resource management.

### **3. Timeframe**

The Nature Recovery Plan sets out the strategic delivery framework to 2020. It should also include a longer term mission or vision and review cycle beyond 2020. The Welsh legislative framework currently under development has a longer timeframe and the key mechanisms will not be in place to deliver for some years. It is important therefore that the Nature Recovery Plan is clear on how it will deliver on-the-ground improvements for biodiversity in the interim, in order to make real, measurable progress towards the goals and wider EU and Global commitments.

### **4. Broad ownership**

A range of stakeholders and Government Departments need to be actively involved in the development and the delivery of the Nature Recovery Plan to capitalise on opportunities through the delivery by others. This will provide the incentive for new and existing stakeholders, and engage the full range of decision makers from all parts of the public sector at a local and a Wales level. This aligns well with implementing natural resource planning and management using the ecosystem approach. Mechanisms to achieve this should be set out.

### **5. Resources:**

Successful delivery will depend on Welsh Government maximising opportunities for joint working and funding across Departments, and on its ability to secure biodiversity benefits from a range of European funds. Each strategic action needs to clearly identify resources to support its delivery, and link to a co-produced set of national and local priorities reflected in the existing and new policies and plans. Delivery of these should be supported by secure and vibrant partnerships across the voluntary/third, public and private sectors.

### **6. Delivery for species**

The Nature Recovery Plan needs to recognise and reflect management requirements that provide specific targeted action for the most vulnerable species, particularly N2K Annex II species.

### **7. Sustainable land/water management**

The current Nature Recovery Plan provides the opportunity to secure sustainable land and water management by active engagement with land/water owners and managers. To effectively address biodiversity declines in Wales, it is absolutely imperative to engage with these stakeholders to enable them to work individually and collaboratively

whilst still sustaining viable businesses within rural communities. To support appropriate action in the right places there needs to be greater explanation on how current and future mechanisms such as Glastir will be informed by the Nature Recovery Plan and also by future area based evidence and advice.

#### **8. Incentivise Businesses**

Natural Resources Wales welcomes the opportunity to review how we, Welsh Government, and others work alongside businesses to review instruments which will encourage land / water owners and managers and other businesses to respond positively to action which supports recovery of ecosystems and biodiversity. We will need to work together to encourage engagement in delivery through advice that is linked to better regulation and improved implementation of regulation. We also advise that Wales demonstrates more effectively how a recovering environment can create a platform for sustainable development and opportunities for green growth.

#### **9. The Goals**

While recognising the need to keep these simple and focused they must also be meaningful to all involved, and measurable and time-bound.

#### **10. Evidence and Knowledge**

We welcome the inclusion of an action specifically on improving the evidence base. The development of a strategic evidence base to underpin this work is a high priority. Current capacity to monitor and report on priority species and habitats to inform SoNaRR and other statutory commitments is limited. Natural Resources Wales has formally recognised the importance of securing an improved evidence base for natural resource management and has produced its Evidence Strategy. However, we also recognise that there is a gulf between ever greater expectations and diminishing resources. It would be helpful to have some more explicit consideration of roles and responsibilities in this area, as well as looking for opportunities to gain evidence from crowd sourcing or citizen science.

#### **11. Capacity**

To deliver the requirements of the Nature Recovery Plan, existing knowledge skills and resources will need to be used more effectively. Increased capacity can come from changing ways of working as well as from increasing investment. Local authorities, Natural Resources Wales, the agriculture sector, other NGO sectors and others are already refocusing their activities in response to natural resource management policies. New stakeholders can also increase capacity to deliver.

## **12. Public engagement**

How we engage people in different sectors of society requires a goal with measurable targets. This is arguably the biggest challenge, as without public support and political will we are unlikely to deliver the other goals. This work links to improving health and well-being, cultural services and social values. It should be supported by the education sector through curricular developments and integration into life-long learning and professional development programmes across sectors.

## **13. Maximise funding opportunities**

Funding streams particularly European (EU) funds, but also including others such as aggregates/waste tax funds, have potential to maximise benefits from public funding invested in nature.

Greater effort will also be needed to identify new financial instruments and market opportunities. The LIFE N2K project has let a contract to explore such opportunities. The contract will identify and appraise both current and potential funding mechanisms for N2K in Wales.

## **14. The Wales Environment Strategy** Clarity is required on the future of the commitments made in the Wales Environment Strategy.

## **15. Global impact of Wales**

This is twofold:

- The impact of decisions and actions taken in Wales on global biodiversity. The latest Living Planet report stated that the population sizes of vertebrate species have fallen on average by 52% in the last four decades.<sup>1</sup> All countries have a responsibility to reduce their global impacts and this plan should set out how Wales will do this.
- Wales supports edge of range habitats which are significant in a European and Global context, such as Atlantic oak woodlands, species-rich marshy grasslands, blanket bog, dwarf-shrub heath and the most southerly UK examples of montane habitats.

---

<sup>1</sup> WWF (2014) The Living Planet Report 2014 – Species and Spaces, People and Places

## Annex 1 – Consultation Questions

**Q1. Do you agree with the focus of the ambition on addressing the underlying resilience of our ecosystems and identifying and capturing benefits for society? If not, what else do we need to consider?**

The ambition to reverse the decline of biodiversity is welcome but should have a timeframe. Is this to be achieved by 2020 or is it longer term? It should include management and restoration of biodiversity and ecosystem services as far as feasible, and also be underpinned by a commitment *to value biodiversity (not just economically) and facilitate/encourage every sector of government and society to act*. The focus on natural resource management will deliver benefits if biodiversity is properly embedded in its policies, decision-making and funding mechanisms. However, other delivery tools will be needed to address the complex and increasing pressures causing biodiversity decline in the terrestrial, freshwater and marine environment.

**Q2. Does the ambition statement capture this new approach fully? What might be added?**

The Nature Recovery Plan needs to establish a sensible and resourced policy framework for the recovery of species and habitats in Wales and clearly state how developing legislative and policy tools in Wales will contribute to delivery. Linking back to the governance set out in the Well-being of Future Generations Bill has the potential to secure delivery at a local level by ensuring biodiversity is properly considered within local Well-being plans. It is important that those who refer to the Nature Recovery Plan understand a) that species and habitat conservation is part of the ecosystem approach and b) their own role in delivering nature recovery. The ambition and goals could be improved to promote this understanding.

**Q3. Are our goals the right ones? What might be added?**

The Nature Recovery Plan needs to set out the immediate goals that Wales will achieve in response to the Convention on Biological Diversity (CBD) Strategic Plan for Biodiversity<sup>2</sup> by 2020. The wording of the goals should be meaningful, measurable and time-bound. It also needs to set out its review/reporting cycle and a longer term vision.

Each goal needs a number of measurable milestones or targets (expressed spatially wherever possible) that will lead to action in the next 5 years. In addition, future milestones or targets beyond this date need to be agreed. In 2006 the Welsh Assembly set out its vision for the environment in 2026 within the Environment Strategy for Wales<sup>3</sup>. The targets in this Plan need to reflect the biodiversity ambition set out in Strategy outcomes 19-22 (pp 36 and 38). These have provided an important lever for co-

<sup>2</sup> The Convention on Biological Diversity (2011) *The Strategic Plan for Biodiversity 2011-2020 and the Aichi targets – Living in Harmony with Nature* Secretariat of the CB, Quebec, Canada

<sup>3</sup> Welsh Assembly Government (May 2006) *'Environment Strategy for Wales'*

ordinated action over the years, including drawing down European and other funding.

We suggest there needs to be 7 Goals. Goal 2 should be split into two and an additional two goals should be added (proposed Goals 6 and 7).

**Goal 1: To restore degraded habitats at Scale**

This should be changed to *‘restore and enhance habitats and species populations working at the appropriate scale in the marine, freshwater and terrestrial environment’*

Targets can then be set to measure progress against this goal which links back to Strategic Goal C and D. The 15% restoration target should be linked to any No Net Loss targets set.

**Goal 2: To address key negative factors of biodiversity loss and increase connectivity significantly.**

This goal should be divided into 2 goals (goals 2 and 3)

**We suggest:**

***Goal 2: to use green/blue infrastructure at neighbourhood, local authority and national scales to connect habitats and ecosystems to benefit both people and biodiversity.***

Examples actions include:

- develop robust green/blue infrastructure policies e.g. through refreshing planning policy, using the existing Local Development Plan process, the National Development Framework and Strategic Development Plans proposed in the Planning (Wales) Bill,
- engage others e.g. local authorities, landowners/managers and businesses in improving connectivity through management of their estate;
- Commit to manage non-built spaces on the Welsh Government estate (including NHS Trusts, and all AGSBs) as multifunctional green infrastructure to benefit both people and biodiversity.

**Goal 3: To address the key negative factors causing biodiversity loss.**

Example action include:

- identify and map the main pressures on biodiversity and identify the potential mechanisms to address them. Some work on this has already been started through the Water Framework Directive and the LIFE N2K project.
- specific time-bound actions to address priority pressures and threats.

**Goal 4: To improve management of our highest quality environments**

Change this to *“to improve the management of our highest quality environments and connectivity between them”*. The goal also needs to commit to the marine, terrestrial and freshwater environments. It should complement the new proposed Goal 2 and focus on “bigger, better and



more connected” high quality environments. We need to see a commitment to maintain and restore a full range of natural habitats, enhance critically scarce habitats and sustain/enhance more modified ecosystems (an important aspect of connectivity) to deliver the full range of ecosystem services and improve resilience for nature and for people.

#### **Goal 5: To achieve No Net Loss**

The goal for ‘No Net Loss’ needs to be more specific and be part of wider regulatory processes (beyond planning). Currently environmental assessments and best practice support decision making to avoid damage and/or deliver biodiversity benefits.

Action examples include:

- Agree a ‘No Net Loss’ policy and build this into the National Natural Resources Policy, area natural resource management statements and SoNaRR.
- Establish the baseline, monitoring and surveillance in order to determine ‘No Net Loss’.
- Engage with different sectors and explore what ‘No Net Loss’ would look like to help businesses understand what they need to do and how this can provide a variety of benefits to their operations.

#### **Goal 6: (proposed goal): Everyone will understand the importance of nature and green infrastructure in supporting human life, and will regard public money spent prudently upon these as a crucial investment.**

All sectors of society have a responsibility to reverse biodiversity loss. This goal needs to set out ambitious targets that will drive action to promote understanding of the value of biodiversity, influence public policy and encourage people to act. Education will be vital to build the understanding on which change can take place (see key message 12). Targets could include making more effective use of outdoor classrooms and outdoor education to make the connections between living in and using the outdoors, and the consequences of behaviour, lifestyle and product design on the biodiversity that people experience.

#### **Goal 7: (proposed goal) – To reduce the global impacts of decisions and actions taken in Wales**

The focus of goal 7 should be on reducing the impacts on global biodiversity of decisions and actions taken in Wales. This aligns with the EU Biodiversity Strategy<sup>4</sup> Goal 6 (averting global biodiversity loss) and should be delivered largely through the Well-being of Future Generations Bill.

Goal 5<sup>5</sup> in the current consultation document is an action rather than a goal and is picked up under actions 8 and 10 below.

---

<sup>4</sup> European Commission (2011) *The EU Biodiversity Strategy to 2020* Publications Office of the European Union, Luxembourg

<sup>5</sup> “To put in place a framework of governance to support delivery, working together across sectors and strengthening our collective evidence base.

#### **Q4. Are the actions proposed right and adequate?**

The actions need to be set out more clearly and directly link back to legislation and delivery mechanisms.

Each action should set out:

- The Action
- Strategic commitments / lead organisation
- Timeframe for delivery
- Resources
- How this will benefit species and habitats
- How progress will be measured
- Accountability

#### **Action 1 - Putting in place effective natural resource management.**

This is an important element of future biodiversity action. However, it is difficult to identify from the current Nature Recovery Plan exactly how natural resource management will deliver action for species and habitats. A diagram might help explain this. There needs to be a clear line of sight from the Nature Recovery Plan to the development and delivery of the WG legislative programme including National Natural Resource Policy and SoNaRR, and to area natural resource management statements. This would improve accountability across sectors for biodiversity loss and degradation, and encourage implementation of the Natural Environment and Rural Communities (NERC) Act 2006: Biodiversity Duty and Section 42 species and habitats.

#### **Action 2 - Delivering a Welsh Marine Plan**

This action should include reference to the protection and management of Marine Protected Areas, in particular the N2K network. The objective is to bring features on sites into favourable condition.

#### **Action 3 - Facilitating Cross-sector policy integration**

The following strategic commitments could help progress this action:

- Review government subsidies with an aim of eliminating those that are damaging to biodiversity/nature (CBD Aichi target 3. In Wales work has focused on the agricultural sector, however there may be other subsidies that damage biodiversity and these should be reviewed and new incentives developed that encourage positive decisions.
- Embed Nature Recovery Plan priorities and measures/indicators in the Well-being of Future Generations Bill to improve accountability for delivery across sectors, and report through SoNaRR.
- Carry out a biodiversity audit across Government departments. The National Assembly for Wales Sustainability Committee Inquiry into biodiversity loss report 2011<sup>6</sup> included a recommendation: “*Welsh*

---

<sup>6</sup> National Assembly for Wales Sustainability Committee (January 2011) *Inquiry into Biodiversity in Wales*



*Government to complete and publish an audit on how Government's aspiration to halt biodiversity loss is reflected in the current work of all Government departments and agencies".*

Some local authorities have already done this.

- Support implementation of the NERC Act Biodiversity Duty across government and its agencies, and support and monitor progress.
- Use the EU Structural Funds in an integrated way to support nature recovery alongside wider economic and social objectives. The European Commission, Director General of DG Environment stated in 2011 that: *"Consecutive LIFE programmes have placed a high priority on Natura 2000. However, the strategic objective has been to mainstream the funding of Natura 2000 into the key sectoral funds and in this context important resources have been allocated from the main EU financing instruments such as rural development policy or regional, cohesion and marine funds".*<sup>7</sup>
- Local authorities have appointed Biodiversity Champions at Cabinet level. We would advocate nominating Biodiversity Champions across government and industry at a senior level. Champions could communicate the risks and opportunities associated with biodiversity to particular sector groups in a language they understand.

Policy integration across all sectors outside the environment sector such as economic development, transport and health links back to our ability to mitigate for, and adapt to climate change. The new legislative and policy framework will provide wider opportunities to influence key sectors.

The key mechanisms for delivering integration we recognise are:

i) the Resilient Wales well-being goal in the Well-being of Future Generations Bill - "A biodiverse natural environment with healthy functioning ecosystems that support social, economic and ecological resilience and the capacity to adapt to change"

ii) the National Natural Resource Policy as set out in the Environment Bill - which should be clear about the importance of the underpinning biodiversity and where activity for biodiversity helps to deliver the Nature Recovery Plan goals

iii) the Area-based Approach and Area Statements as set out in the Environment Bill – which should provide a clear steer to other public bodies in the contribution that they can make in delivering the Nature Recovery Plan goals, thereby complying with the NERC Act Biodiversity Duty and demonstrating the application of the Sustainable Development principle and the contribution to the Well-being goals

---

<sup>7</sup> Kettunen, M., Torkler, P. and Rayment, M. (2014) *Financing Natura 2000 Guidance Handbook*. Part I – EU funding opportunities in 2014-2020, a publication commissioned by the European Commission DG Environment (June 2014)

iv) likewise the National Marine Plan should be clear about the expected role that different industry and sector groups will need to play in contributing to the resilience of marine biodiversity and ecosystems.

The Well-Being of Future Generations Bill will require the public sector to consider the sustainable development goals in their decision making processes. The “Resilient Wales” Goal in the draft provides an opportunity to ensure all sectors consider resilience - and therefore biodiversity - in decision making processes, but success will require the involvement of biodiversity expertise. Natural Resources Wales’s statutory membership of Public Service Boards will help embed natural resource priorities in the development of Well-Being Plans. Local biodiversity arrangements will also have a crucial role, and can help with both local prioritisation and delivery. This resource is a key risk as local authorities and others face budget reduction. Welsh Government needs to secure agreement on how to retain critical expertise, skills and mechanisms to deliver nature recovery and wider natural resource management and planning policies.

Biodiversity expertise from across Wales needs to be involved in the development of the National Natural Resources Policy, the area natural resource management statements, and mechanisms developed as part of the Wales National Marine Plan. This will ensure that, when balancing the different requirements of land and water management, the impacts on, and opportunities for, biodiversity are considered in an informed way.

Embedding biodiversity in the new delivery mechanisms can be guided by existing priorities and draw on work already undertaken at a local and a national level. Protected sites and species and the NERC Act (2006) Section 42 list of habitats and species underpin this work. Natural Resources Wales continues to undertake connectivity mapping for priority sites and habitats, and the Wales Biodiversity Partnership (WBP) have produced maps showing where urgent action is required for different ecosystems. These are fundamental to delivering the Goals highlighted in the Nature Recovery Plan. We see these as critical to informing the area-based approach, particularly where they can be presented as strategic opportunity maps. Similarly, local authorities have mapped their local wildlife sites and Local Biodiversity Action Plan Partnerships (LBAPs) have identified priorities. Along with all the work undertaken by partner organisations this provides a wealth of information on which future prioritisation can be built to inform new statements, policies and plans.

#### **Action 4 - Funding our partners**

There needs to be some separation between the action ‘Funding Our Partners’ and the action ‘Identifying financial instruments’.

Currently the Funding Our Partners action covers Welsh Government and Natural Resources Wales funding, in addition to the European Maritime and Fisheries Fund (EMFF) and LIFE. The action on financial instruments

contains reference to the Natural Capital Financing Facility which is part of the LIFE Programme. We suggest that the Funding section could cover Welsh Government and Natural Resources Wales financial support and the other section could cover European and other funding streams.

We very much welcome the commitment to fund our partners as the Nature Recovery Plan cannot be implemented by Welsh Government or Natural Resources Wales alone. It will need to involve a range of stakeholders who will need resources (staff and finance) to deliver, and so this action will underpin a considerable share of the contribution some partners make. Funding opportunities need to be developed and delivered in a coordinated manner.

Two headline messages that need to be embedded into any Government approach to funding are:

- A programme of funding over 3-5 years with an annual launch would establish a longer term timeframe for delivery. This longer term approach would not only enable continuity and encourage partners to develop better quality projects but would take into account the time required to make a real and measureable difference to habitats and priorities.
- Any fund must take account of time required for application, assessment and establishment of projects and initiatives: a short lead-in time is not conducive to quality projects.

Welsh Government could explore further Strategic Joint Working through partnerships, building on and expanding the work currently underway in Natural Resources Wales. Welsh Government could develop a joint partnership around a specific issue, develop ideas and improve capacity to address this issue. One example is the emerging Welsh Government-led Peatlands for the Future project. There are other significant opportunities including the wider use of the model developed for the Welsh Government Resilient Ecosystems Fund.

### **Action 5 – Identifying financial Instruments**

A number of European funding mechanisms have the potential to support nature recovery.

- **LIFE Funding:** The LIFE Programme is the only European fund solely for funding of the environment. The opportunities offered by LIFE cover all aspects of the environment, including biodiversity, nature conservation and in particular for climate change mitigation. The Consultation document refers to the perceived complexities of this fund, and it will be essential for Welsh Government to support LIFE applicants to access these funds in order to ensure that the opportunities offered are maximised. The Natural Capital Financing Facility (NCFF) is part of the LIFE Programme and is intended to encourage investments in revenue-generating or cost-saving

projects promoting natural capital and green growth. Reference to the NCFF in the Consultation document is welcomed, as this can promote the recognition of the economic role of the natural environment.

A strategic framework laying out broad objectives and relative priorities for funding is important. The LIFE N2K project managed by Natural Resources Wales can provide this framework for Wales's Natura sites but a similar framework could be developed for other sites and would act as a guide to funders and applicants alike. However, this would require dedicated funds.

Development of major externally funded projects by partners should be encouraged and supported with a clear pathway to information, match funding opportunities, bid preparation, project management expertise, and Welsh Government support.

Funding to support technological developments and other innovative methods to solve biodiversity management problems would be welcome, as is happening with the Small Business Initiative in which Natural Resources Wales is already engaged. There should also be investigation into the feasibility of initiatives such as a visitor payback schemes, and the development and marketing of produce from wildlife areas.

We would also welcome strategic funding mechanisms that improve nature through targeted sustainable land management of privately owned farmland. This would need to be at a landscape scale by encouraging the cooperation and collaboration of farmers. The popularity of the Welsh Government Nature Fund clearly demonstrates that, with the right incentives in place, there are many groups of farmers that are willing to deliver a broad range of services that benefit nature in addition to producing sustainable food on their farms.

There needs to be clear and open dialogue between Welsh Government, Natural Resources Wales and other stakeholders on improving and joining up existing mechanisms and developing new ones to encourage greater investment in the natural environment. Further opportunities may arise by tackling where there is market failure, and by linking beneficiaries of services with those who provide the benefit.

#### **Action 6 – Reviewing designated sites and species**

Natural Resources Wales welcomes the statement that *“Our designated sites are the jewels in the crown of our natural environment and need to be core to our refreshed approach.”*

The proposal is about the integration of conservation objectives rather than the species and habitats. We suggest this action is renamed to reflect this.

The text should clarify that the management and restoration of N2K sites will be delivered under the strategic framework of the LIFE N2K Programme and Prioritised Action Framework (PAF). The programme will set out actions, costs and priorities for the network. Welsh Government's support for this initiative is welcome. Delivery of high priority actions identified in the N2K Programme and PAF should be supported, for example, by access to external funds so that favourable condition of features is achieved within identified timeframes.

This action commits "*Government to set clear objectives for the European designated Natura 2000 network (N2K) in the statutory National Natural Resource Policy.*" We agree that it would be helpful for the National Natural Resources Policy to make clear that meeting the conservation and restoration requirements of the N2K network is a priority. This should also be stated in the Nature Recovery Plan. However it is not clear what is meant by the proposal for Welsh Government to set clear objectives for the N2K network. Any such objectives will need to align closely with the Habitats Directive's strategic aim, otherwise it runs the risk of creating tensions between the new Natural Resources Policy and Wales's obligations under the Habitats and Birds Directives. Also, any national or strategic level objectives for the N2K network will need to support and reinforce the site level objectives set out in the management plans for N2K sites.

We would welcome some further discussion on the proposal for "*Natural Resources Wales to review and strengthen the approach to site management plans so that they proactively address the underlying challenges facing the designated areas and so that regulatory and funding activity is fully aligned to deliver the management objectives*". This is a potentially significant piece of work. Natural Resources Wales is already carrying out a review and updating the N2K management plans. We would welcome the discussion being based on these findings.

The SSSIs and N2K sites represent the most important sites in Wales for the conservation of biodiversity. Successfully halting and reversing biodiversity loss will require concerted action, both inside and outside the designated sites network. The emphasis of this particular strand of work should therefore be on looking at how measures in the wider environment can help strengthen and complement the ability of these sites to deliver their statutory purpose of helping to conserve and restore biodiversity. With this caveat we support the principle of seeking to treat N2K sites, other designations and the wider environment in ways that deliver multiple benefits. Wales's current suite of designated sites already provides a wide range of benefits in terms of ecosystem services. Recent research commissioned by Defra on the benefits of SSSIs in England and Wales showed that the estimated value of SSSIs in terms of provision of



ecosystem services far exceeds their cost<sup>8</sup>. That report also provides evidence that the value of SSSIs as providers of ecosystem services is further enhanced if they are well managed so as to achieve the favourable condition of the designated features.

We note the intention is to explore opportunities for future legislative change if it is considered necessary, and we look forward to continuing to support and advise Welsh Government in identifying and understanding the nature and causes of any conflicting objectives around designated sites and protected species, and possible solutions.

In general, the objectives from the different legislations do not conflict, but there are often different levels of aspiration and a different focus. Work is already underway to align objectives (e.g. the Water Framework Directive with the Habitats Regulations), and where it may not be possible to remove objectives it would be better to consider increasing transparency, alignment and integration of those objectives around a particular place.

#### **Action 7 – Monitoring and reviewing regulatory instruments**

We note that the new EU Commissioner for Environment, Maritime Affairs and Fisheries, Karmenu Vella, has stated that he will be carrying out a “Fitness Check” of the Habitats and Birds Directives, therefore, these findings will need to be taken into account.

#### **Action 8 – Improving the Evidence Base: Research, Monitoring and Surveillance**

The Plan needs to include recognition of where we are now and where we need to be with biodiversity evidence-based development. We should then focus on the strategic action required, who needs to be involved and how this will be resourced, with a view to informing SoNaRR and our international reporting commitments as well as providing evidence-based advice.

Natural Resources Wales has developed an Evidence Strategy in association with Welsh Government, which includes 8 strategic objectives. These describe our long term ambition and are all relevant in the context of this consultation response (see Annex 3). Specifically Objective 6 is important here “*We will work on securing the evidence needed to halt biodiversity loss (including achieve the CBD and EU targets) and for climate change adaptation and mitigation.*” The deliverables for this objective include:

- Provide the evidence base to secure the strategic long-term management and restoration of our designated sites;
- Continue to provide the evidence base to inform our understanding of ecological connectivity;

---

<sup>8</sup> GHK Consulting Ltd, in conjunction with Dr Mike Christie of Aberystwyth University, ADAS, IEEP, Rick Minter and the Research Box (June 2011) Benefits of Sites of Special Scientific Interest DEFRA, London



- Continue to develop our strategic biodiversity evidence base (e.g. habitat mapping);
- Provide the evidence to inform our efforts to meet CBD/Aichi targets to halt and reverse biodiversity loss.

These cannot be achieved without delivering all of the 8 objectives to build our capacity, our knowledge base, our partnerships and our ability to interpret evidence. This in turn will underpin our advice both internally and to Welsh Government, and improve our reporting.

Improvements in monitoring and surveillance require broadening out these programmes into the wider environment. This needs to include monitoring and surveillance for species, habitats, ecosystem functioning, environmental variables and human pressures affecting biodiversity. In particular there needs to be a record of the losses and impacts associated with development or regulatory decisions. This requires a significant increase in resources. An inadequate or uncertain evidence base will generate risks which could compromise the Recovery Plan and the progress of the required environmental management.

We support the suggestion to include testing and monitoring of fundamental aspects of ecosystem functioning such as soil condition. This is consistent with European and international policy responses to biodiversity loss, where soil issues are increasingly and explicitly being considered e.g. CBD<sup>9</sup> and Sustainable Development Goals<sup>10,11</sup>. A lack of understanding of soils presents a significant knowledge gap<sup>12</sup>, which hindered the achievement of the 2010 headline target for biodiversity and is an obstacle to reaching the 2020 biodiversity headline target and vision<sup>13</sup>. Work to establish the condition of soil and assessing the risks of soil biodiversity loss will need to utilise robust indicators and be integrated with programmes that study the relationship between soils, above-ground biodiversity, and the resulting ecosystem services<sup>14</sup>. We recognise the significance of the soil quality monitoring work being carried out for the Glastir Monitoring and Evaluation Programme. The augmentation of monitoring to adequately cover soils as part of

---

<sup>9</sup> Report of the Subsidiary Body on Scientific, Technical and Technological Advice on the Work of Its Seventeenth Meeting. UNEP/CBD/COP/12/2. <http://www.cbd.int/doc/meetings/cop/cop-12/official/cop-12-02-en.pdf>

<sup>10</sup> The Future We Want: Outcome document adopted at Rio+20. A/RES/66/288. [http://www.un.org/ga/search/view\\_doc.asp?symbol=A/RES/66/288&Lang=E](http://www.un.org/ga/search/view_doc.asp?symbol=A/RES/66/288&Lang=E)

<sup>11</sup> Report of the Open Working Group of the UN General Assembly on Sustainable Development Goals. A/68/970. [http://www.un.org/ga/search/view\\_doc.asp?symbol=A/68/970&Lang=E](http://www.un.org/ga/search/view_doc.asp?symbol=A/68/970&Lang=E)

<sup>12</sup> EU 2010 biodiversity baseline. EEA Report No 12/2010. [http://www.eea.europa.eu/publications/eu-2010-biodiversity-baseline/at\\_download/file](http://www.eea.europa.eu/publications/eu-2010-biodiversity-baseline/at_download/file)

<sup>13</sup> Impact assessment (SEC(2011) 540) accompanying Our life insurance, our natural capital: an EU biodiversity strategy to 2020 (COM(2011) 244 final). <http://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:52011SC0540&from=EN>

<sup>14</sup> Soil biodiversity: functions, threats and tools for policy makers. Technical Report - 2010 - 049. [http://ec.europa.eu/environment/archives/soil/pdf/biodiversity\\_report.pdf](http://ec.europa.eu/environment/archives/soil/pdf/biodiversity_report.pdf)

Sustainable Land Management and Integrated Natural Resources Management will require significantly increased resources.

We are also mindful that the relationship between biodiversity and concepts such as ecosystem resilience, resistance and services, are complex and still poorly understood. There are primary and large scale research needs around understanding ecosystem structure and functioning; climate change interactions; cumulative pressure effects; and sustaining and increasing ecosystem benefits. We recognise that the need for this type of research extends beyond Wales and is reflected in UK science strategy, such as the UK Marine Science Strategy. As a consequence Natural Resources Wales is seeking to influence the research agenda of other organisations such as the Natural Environment Research Council.

Natural Resources Wales is fully committed to the operational ambition of the Hampton Principles - collecting data once, sharing it, and using it often. We also believe the overall objective of evidence is to provide the context to motivate the societal and governmental changes needed to protect nature for the future.

Given the significant challenges set out above and the commitment to developing evidence-based policy, it is vital that Welsh Government works with partners to look for opportunities to address the key gaps in resources and capacity. The suggested development of a shared evidence base between Natural Resources Wales and Welsh Government is welcome. It will further support our evidence and reporting work if we also engage with existing and planned UK mechanisms such as the State of Nature Partnership. In line with this we strongly support the use of the Information Hub and its role in making environmental data open and available to anyone with a need or interest. This work should link to, and build on existing initiatives and engage in wider partnerships. In Wales this includes, the Local Records centres, the WBP Evidence Gaps project and the continued use and support of BARS as the monitoring and evaluation framework for the Nature Recovery Plan.

We welcome the commitment to monitor and model the Nature Recovery Plan and we would support a wider discussion, including partners, on how this might be achieved. Any monitoring of the impact of the Nature Recovery Plan will need to be aligned to the requirements for SoNaRR and ultimately CBD reporting, and include data from current statutory monitoring. Monitoring should also seek to make use of existing long term monitoring programmes e.g. for butterflies, bats and some bird species, as well as data from the long term environmental monitoring schemes.

### **Action 9 – Effective Communication and Engagement**

To secure delivery of the outcomes, engagement about the value of Wales's biodiversity is key. This should be achieved by effective communications to a diverse range of audiences with a clear focus to encourage behaviour change where appropriate.

We agree with the statement that Welsh Government need to engage with, enthuse and communicate the value of biodiversity so that stakeholders are encouraged to act. We feel that this section of the Nature Recovery Plan is vital and this is why we have suggested that engaging people and encouraging them to act becomes an explicit new goal for the plan (as mentioned in our response to Q3). This goal should have clearly defined targets and outcomes so that we can track and measure progress over time.

Much work was done around prompting people to value, care and act for biodiversity for the International Year of Biodiversity in 2010, and Futerra – a creative communications agency - developed a guide to creating effective messages. The key idea from this work is that we need to humanise and personalise the environmental message. But ultimately we must ensure that people understand “why” nature recovery is important in building a secure future. The key output from this work is that by personalising the environmental message, we make it more meaningful to those people that we want to reach.

However, biodiversity and nature must not be seen as a stand-alone – we must ensure that they become the cornerstone of our message. Integrated Natural Resource Management is a developing concept and Welsh Government leads on developing an agreed definition. Welsh Government must describe the concept in an accessible way, with easy to understand language. This way more people will understand the ideas behind the theory, encouraging momentum in its take up as a foundation for our decisions.

**The Nature Recovery Plan communications plan:** we believe that this needs to be strengthened. Welsh Government needs to lead, inspire and engage others so that we can work collaboratively to deliver a shared communications approach against which our work can be evaluated and measured.

While the consultation document refers to some existing partnerships, there are many other programmes of work that could be exemplar. Natural Resources Wales has a key role to play in the development of an effective communications and engagement approach, and is willing to work collaboratively to create the best results for the benefit of Wales.

### **Action 10 – Providing Better Governance for Nature**

Natural Resources Wales is supportive of this action. It is important that the ‘refresh’ fully engages existing partners and builds on the successes of the current arrangements.

All-Wales groups are an important element of the delivery of this plan. It has been invaluable to have groups that are able to give informed advice to those who deliver action. There is a need to establish a robust governance structure to oversee the management and restoration of the N2K network across Wales in addition to ecosystem and species and INNS groups. The challenge will be to ensure that strategic needs are embedded into the local governance structures that are developed, as well as all-Wales level groups.

It has been a challenge in the current structure to build in a way of engaging new stakeholders to improve integration and broaden ownership without diluting the robust scientific basis on which the ecosystem and species groups are built. It might be best to establish this through robust links from the WBSB to the wider public sector, as part of the formal governance and reporting arrangements for the Well-being of Future Generations Bill.

Ultimately good governance should lead to greater activity on the ground and the realisation of the goals set out in this plan. Regional partnerships, forums and groups (referred to as regional groups), LBAPs and LRCS are examples of initiatives that have galvanised local effort.

**Regional groups** have a more strategic role and work to deliver shared priorities across a number of LBAPs e.g. through landscape-scale initiatives as well as developing common guidance and funding proposals that cross boundaries.

**LBAPs** bring together local people, local authority staff and others with the expertise to plan action and deliver shared local and national priorities. Action has included practical management, influencing local decision making, collecting the evidence, educational activities and a variety of events such as those held during Wales Biodiversity Week, all aimed at increasing knowledge, interest and understanding about the importance of nature.

**LRCs** have a key role in citizen science and engaging local recorders and recording groups. They have a lot of experience in this area as well as a uniquely local perspective and well established contacts.

As local authorities restructure it will be important to maintain local expertise. Welsh Government should work with the WLGA and Natural Resources Wales to consider what local level action will help deliver local Well-being Plans. This work is vital if national policies for nature and wider natural resources management are to work. A commitment to develop these links could make effective use of local knowledge, expertise and skills.

This action commits to identifying priority species and habitats that society wishes to see benefit. This is important, especially if the Nature Recovery Plan is to engage with the public, and to some extent this has been done through initiatives such as Plantlife's County Flower. However, the Welsh priorities for action must be based on robust evidence and informed by the relevant expertise as well as aligned with existing commitments defined in European and UK legislation.

**Q5. What additional action would you wish to see?**

The plan proposes a fairly comprehensive suite of high level actions. The main gaps identified are actions to support the proposed Goals 2 and 7. Inclusion of an action that commits to achieving favourable condition on all designated sites would be helpful. The assumption is that this high level 'Plan' will be supported by the development of a resourced action plan to enable delivery on the ground.

The focus should be on getting the proposed actions right and linking them firmly to governance arrangements emerging from new legislation and policy and to SoNaRR. This should ensure shared responsibility and greater accountability for the Nature Recovery Plan, and support real benefits for nature on the ground by using the full set of existing and developing mechanisms and tools.

**Q6. How do we engage with business more effectively to deliver our ambition?**

- Engage stakeholders from key business sectors in understanding the benefits of nature and in the development of mechanisms and tools for delivering the Nature Recovery Plan, embedding their knowledge, learning from their experience and utilising their skills.
- Increase the Nature Recovery Plan's focus on the 'start of pipe' solutions that remove the causes of biodiversity loss. A deeper, more transparent engagement with business and the co-development of workable solutions will be an important part of fixing problems at source.
- The Natural Resources Wales Board Champion for Innovation is investigating the potential creation of a Wales-focused Natural Resources Coalition to bring together leaders of progressive businesses with policy makers and staff, to develop potential routes to success that factor in the radical, transformative change that will be needed.
- Revise incentives, other than for agriculture, as suggested under Action 3 on Integration. This could also extend the 'polluter pays' principle to biodiversity by offering financial rewards or exemptions from charging for businesses which participate effectively in schemes to promote biodiversity (e.g. the Wildlife Trusts' Biodiversity Benchmark scheme), and recover the money from fines or charges for those which do not - rendering this policy fiscally neutral.



- Use the new legislative and policy framework (including the marine Plan) to take a fresh look at how Wales develops its infrastructure. There is an opportunity to adopt a strategic and long term approach to integrating green, blue and grey infrastructure to ensure future economic, environmental and social resilience. This will help Wales attract long term, sustainable business.
- Use the new RDP to focus on (i) a more targeted approach to the land management payments available under Glastir; (ii) capital investments that contribute to resource efficiency; and (iii) advisory systems which provide farmers with practical tools to measure the contributions of their businesses to sustainable land management.
- Welsh Government could consider the employment of environmental advisors for the enterprise zones to ensure that these zones actively contribute to the Nature Recovery Plan and other environmental goals. These could be linked to the area natural resource management statements and delivery of local Well-being Plans.

The Nature Recovery Plan sets out the ambition for biodiversity and ecosystems. However, the goals and actions can inform future strategies and should be supported by government through funding, incentives and investment opportunities for all sectors, from agriculture and forestry to energy and fisheries.

#### **Q7. How can we strengthen the way we work together?**

**Integration:** Ensuring nature recovery is firmly integrated in the new legislative and policy framework and the resulting delivery mechanisms. Throughout this consultation response we have set out how we think this can be achieved to ensure that the Nature Recovery Plan is delivered through the Welsh Government's new approach to sustainable development, natural resource management, planning and marine planning. Central to this is linking the governance and reporting for biodiversity to that of sustainable development. This must happen at a strategic and a local level so that there is joint accountability.

**Partnership:** Maintain and support the biodiversity and ecosystem expertise that has been developed at a local and Wales level. Limited capacity means that partnership working is essential to develop and act on evidence, and invest in appropriate action in the right places. The partnership approach provides a single voice for those taking local action. This is an effective and efficient use of the limited expertise available in Wales.

**Sustaining local delivery:** At a local level the LBAPs and LRCs have proved to be a successful mechanism for coordinating evidence and action through engaging and enthusing different sectors. Continued investment in delivering local action will be necessary. There is much that can be learnt from these approaches.



**Engaging stakeholders:** Empowering, broadening and incentivising local involvement by engaging new stakeholders such as local business and health authority representatives is a key challenge and an opportunity. Stakeholder groups such as agriculture and fishing can bring valuable local knowledge, supporting the collection of new data and information as well as ideas on how to engage in their wider communities to deliver action. Understanding, where relevant, the economic value of taking action for biodiversity will be vital to encourage input from some key sectors and for influencing decision makers about budget allocations. It is good to see the consultation includes reference to the Wildlife Economy Wales report<sup>15</sup>, however, there are gaps, consideration could be given to targeting or tailoring this economic / benefit assessment work to specific sectors or audiences.

**Cross border working:** For some species, habitats and ecosystem services strong collaboration with the other UK countries and Ireland will strengthen our ability to achieve benefits. Welsh Government will need to consider how we can maximise these opportunities as we develop new Welsh legislation and policies.

#### **Q8. How can we share budgets and look at integrated outcomes?**

The Well-being of Future Generations Bill aims to ensure budgets are aligned to the Well-being goals for government and its agencies to encourage integrated shared outcome delivery. Evidence such as the UK National Ecosystem Assessment increasingly demonstrates that action that benefits biodiversity also benefits other government priorities<sup>16</sup>. There is therefore a real opportunity for government to demonstrate how it can work across sectors to secure collaborative delivery, sharing expertise, staff and budgets. To achieve this, biodiversity and ecosystem values (not just financial) need to be embedded in the corporate strategies/plans of a range of stakeholders using the Resilient Wales Well-being goal as the lever.

One example might be a collaboration with Public Health Wales (PHW) and local health boards. Currently a number of schemes have been successfully trialled to test the use of outdoor activity in the natural environment as an alternative to conventional prescriptions for patients with certain physical and mental health issues. An ambition would be to work towards a shared budget between environment and health departments to deliver common outcomes and providing a funded alternative to prescribing whilst also maintaining natural green space. Common indicators could be adopted to meet objectives in the Nature Recovery Plan and the Health Strategy e.g. via Public Service Boards.

---

<sup>15</sup> Mabis (2001) 'Wildlife Economy Wales': An Economic Evaluation Scoping Study' – Final Report A report Commissioned by the Valuing our Environment Partnership

<sup>16</sup> UK National Ecosystem Assessment (2011) 'The UK National Ecosystem Assessment Technical report.' UNEP-WCMC, Cambridge



In many cases collaborative working will need additional and sustainable funding to support delivery of the shared outcomes. The Nature Fund process has led 14 new farmer collaboration groups set up in 2014. This demonstrates the potential for delivering on a landscape scale in areas where this has been difficult due to the patchwork of individually owned private land in Wales. Future funding needs to be part of a longer term programme to secure long term benefits.

Welsh Government should adopt a more coordinated approach to European Funding including LIFE, plus provide support for accessing these structural funds.

The revised Prioritised Action Framework (due to be completed in August 2015) should be used as the strategic framework to determine and prioritise applications for European funds for the N2K network.

**Q9. What else should be done to avoid duplication and to deliver our goals?**

- Close working with United Kingdom Environmental Observation Framework. <http://www.ukeof.org.uk/> (UKEOF) to avoid duplication of monitoring effort.
- Close working with the National Biodiversity Network (NBN) and the Marine Environmental and Data Information Network (MEDIN) to avoid duplication of ecological data tools, guidance and standards.
- Close working with the LRCs in Wales to take advantage of their work with local recorders and recording groups and the data management services they offer.
- Co-ordinated and comprehensive use of BARS.
- Support and engagement with the WBP Evidence Gaps project.
- Work with the Wales Environment Research Hub which can provide synthesized evidence, and build capacity to deliver evidence-based policy.
- Engage with LBAPs, regional groups and Wales-level WBP groups.
- Close working with Welsh Government on development and delivery of Payment for Ecosystem services and other mechanisms.
- Coordinate and support development of European funding bids.
- Continued support for collaborative working with partners.
- Continue to engage with land/water owners and managers and other businesses in Wales using various current/new mechanisms and incentives.

**Q10. How can we best use the Information Hub to collate and disseminate data and evidence?**

The data and information Hub represents a great opportunity to make ecological data relating to Wales available to a wide range of people. There are a few points which need to be considered to get the most out of it, however:

- a. Links need to be made with existing data portals, especially the NBN Gateway (<https://data.nbn.org.uk/>) and the Local Record Centres' Data Access Tool. This will avoid duplication and also there is an opportunity to use web services to pull data in from these locations, and display it through the information hub.
- b. Consideration of access and rights controls. Without a system of approving access to various areas of the download and/or datasets we will be limited to open data, which loses the opportunity to use the system to give licence-controlled access to data. This would be a huge time saving for Natural Resources Wales and other data providers, and a much quicker and simpler method of accessing data for our data customers.
- c. The Hub needs to be a mechanism to help Natural Resources Wales and others meet their obligations under the INSPIRE Regulations.
- d. Careful thought will need to be given to standards and formats for the Hub to ensure inter-operability of datasets. This is required so that information on various aspects of the environment can be combined, viewed and queried together, allowing an ecosystem approach to be taken.

**Q11. How best should we communicate progress with delivery of our ambition, for example, by a three or five year work programme or an annual delivery plan?**

The reporting cycle should link to other key reporting cycles. Wales needs to contribute to the UK CBD report and thought also needs to be given as to how the Nature Recovery Plan will be reported through the SoNaRR and the Sustainable Development duty.

In addition to formal reporting, Welsh Government should consider how it reports back to the public and other stakeholders. Current communications mechanisms could be developed to support this e.g. WBP website and development of social media; feedback from LBAPs to Public Service Boards; better use of the WBP Conference and Wales Biodiversity Week.

**Q12. We have asked a number of specific questions. Please let us know if you think there are related issues which we have not specifically addressed, and provide further information.**

We have no further comments. However, we have specific suggestions concerning the text in parts of the Plan that we would be happy to discuss with members of the Welsh Government Biodiversity and Nature Conservation team. These are provided in Annex 1.



**General:**

Diversity: There are many references to the importance of diversity. There needs to be recognition that some natural systems are not diverse and are equally important. If they become more diverse (in terms of species) it could be because they have become degraded (enrichment from pollutants/INNS etc) – so in these cases, *less* diversity may be more reflective of a healthy resilient ecosystem.

**Page 4 paragraph 4** - Please add freshwater into terrestrial and marine environments.

**Page 6** - This section is currently a description of some of the rich areas for biodiversity in Wales (or explains why Wales is important for biodiversity) and if this is what is intended it should include some representative species e.g. western woodland birds (pied flycatcher, wood warbler), marsh fritillaries, lesser horseshoe bats etc. If the intention is to describe the landscape/seascape of Wales today then this paragraph would look very different, and include reference to a landscape shaped by agriculture, forestry, tourism and coal, slate and energy developments etc. Alternatively you could use the key findings from the Wales chapter of the National Ecosystem Assessment (set out in Annex 1 of the consultation document) or a selection of these. The ambition could then go on to explain how biodiversity can thrive alongside and be part of the wider industries and developments that sustain the economy in Wales, e.g. agriculture, fisheries, tourism, forestry, utilities, energy, house building and other development. Whatever is intended the message is that the title to the section needs to be clear and the text needs to accurately reflect the title.

**Page 7 - scale or extent.** Pollinators are not a good example for this. It would be better to use a wetland example: smaller wetlands are more threatened by impacts at their edges from, e.g. fertiliser, drying, scrub invasion.

**Page 8 - role of protected areas.** Also important is the fact that they may support only part of a species habitat requirement. We cannot, for example, notify all the feeding range of the bats using a building that is a SSSI; upland raptors need ffridd or even coastal areas to support their winter feeding. Habitats in protected areas also sit within the wider matrix of that and other habitats within the wider countryside.

This section needs to cross reference with the review of Designated Landscapes in Wales.

**Paragraph 1** says that *‘The diversity should maintain the ability of ecosystems to adapt to whatever disturbance is applied to them’*. This statement is not correct and should take out ‘whatever’ and change to “natural disturbance”.

### **Annex 3 – Natural Resources Wales Evidence Strategy Objectives**

The **8 Objectives** in the **Natural Resources Wales Evidence Strategy**:

1. We will further develop our independent capacity to report on the state of our natural resources and the pressures they face (including statutory environmental monitoring).
2. We will have the evidence to provide the context for Natural Resources Wales's decision-making and operations.
3. We will have the evidence needed to underpin advice to Welsh Government, including potential areas of policy development.
4. We will provide the evidence required to support implementation of The Ecosystem Approach, Natural Resource Management and Ecosystem Services Assessments.
5. We will increase our in-house capacity to analyse and interpret data and wider evidence in the context of changing operational and policy needs.
6. We will work on securing the evidence needed to halt biodiversity loss (including achieve the CBD and EU targets) and for climate change adaptation and mitigation.
7. We will expand and develop evidence partnership opportunities and seek to influence the research agendas of others.
8. Through succession planning we will secure and develop the Natural Resources Wales knowledge base in terms of staff skills.