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NATIONAL PARKS WALES  
Britain's breathing spaces

eacom@parliament.uk  
via email

Your Ref:  
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To Whom it May Concern

**Re: 'Protecting biodiversity in a changing Britain' Inquiry**

The National Park Authorities in Wales – collaborating as the Welsh Association of National Park Authorities (WANPA) - are grateful for this opportunity to respond to the above consultation.

**Background**

The three Welsh National Park Authorities collaborate as WANPA to respond jointly to policy initiatives impacting Wales' three National Parks.

The National Parks have two statutory purposes in the 1995 Environment Act:-

- Conserve and enhance the natural beauty, wildlife and cultural heritage of the National Park.
- Promote opportunities for the understanding and enjoyment of the special qualities of the Park by the public.

In fulfilling these purposes, the National Park Authority has a duty to :-

- Seek to foster the economic and social well being of the local communities within the National Parks.

Cymdeithas Awdurdodau  
Parciau Cenedlaethol Cymru

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The special qualities of the three National Parks are recognised and admired both by local residents and external users. Within Wales, National Park Authorities are regarded as leaders in landscape management.

### **Response to the Consultation Exercise**

Officers with a professional interest in ecology from the three National Parks within Wales have contributed to this response.

### **Policy and progress**

#### **1. Is the Government on course to meet its 2010 biodiversity target?**

All available evidence (eg Condition monitoring and assessment of Natura 2000 sites and SSSIs indicating many features in unfavourable-declining condition; RSPB State of Birds Report, 2008; MONARCH study of impacts of climate change; WWF State of the Oceans Report; Charting Progress, An Integrated Assessment of the State of UK Seas, DEFRA 2005) overwhelmingly indicating continued loss and decline of habitats and species in UK.

#### **2. How effective is the biodiversity monitoring and reporting process? Are the biodiversity indicators meaningful? Is there adequate data upon which to define targets and to assess progress?**

- The biodiversity monitoring and reporting process is still heavily reliant on volunteers with appropriate skills and knowledge. This is a dwindling resource and could negatively impact on our ability to monitor and assess progress. There are also insufficient resources available for professional staff to monitor biodiversity and report on progress, particularly for habitats and species in the wider countryside and outside protected sites. Organisations such as NATUR in Wales are looking to address this issue.
- Biodiversity indicators can be arbitrary particularly as data upon which to define them tend to be inadequate. The reasons for this are outlined above - ie not enough expert knowledge in local areas to contribute to the monitoring/surveillance process.
- The Biodiversity Action Reporting System (BARS) has only been taken up patchily, afflicted by the usual aversion to database management within nature conservation. Within Wales, uptake is better, with training provided on behalf of the Wales Biodiversity Partnership to South Wales LBAP officers for example.

#### **3. Are the policy and institutional frameworks effective at protecting biodiversity? Is biodiversity protection addressed effectively at local and regional levels? How successful has the UK Biodiversity Action Plan been? Does Conserving biodiversity - the UK approach address the need to have a joined-up approach to biodiversity protection with the devolved administrations?**

- Devolved administrations in the UK have led to a fragmenting of policy and its implementation (this is particularly a problem in the marine environment). The NERC Act 2006 "Biodiversity Duty on Public Bodies" is very welcome but is far too weak as it only requires public bodies to "have regard for biodiversity". Even if this duty were implemented robustly, it would not address the key factors affecting biodiversity and causing the major declines in species populations and

degradation of habitats (eg modern farming practices and their impacts on biodiversity in the wider countryside).

- The structure that has been created places far too much emphasis on the bureaucratic process and insufficient emphasis on outputs and outcomes. UK plc is almost entirely focussed on designations and protected species at the expense of wider biodiversity. We are concerned that statutory bodies no longer "do" nature conservation, are starved of the means to deliver effective conservation, and are given corporate targets that will not necessarily deliver wider biodiversity targets.
- Some policies and legislation are useful but if they're not recognised by or enforced by the relevant authorities then they're at best only useful locally and at worse they're wholly ineffective. The same operational climate still prevails, wherein conservation agencies and charities and specialist conservation and project-based staff exist because they're tasked with undoing the damage caused by other aspects of public policy and legislation, all of which are much better funded. The best way for the public and third sector to be made effective would be for national and devolved administrations to remove these orthogonal, institutionalised obstructions; i.e., stop wasting public money by continuing to damage nationally treasured assets.
- The UK Biodiversity Action Plan has been ineffective because it is inefficient and process driven - it has not galvanised enough significant action amongst those who would not be working for biodiversity anyway, it hasn't changed cultures, and it doesn't have sufficient political weight to significantly affect other national policies. At best the UK BAP can only deliver mitigation and small improvements because it does not have sovereignty over the plans and policy programmes that represent the major threats to biodiversity.
- Within Wales, the Assembly Government' requirement for every local authority to field a Biodiversity Champion, ideally at Member level, has not run for long enough to have any real impact and is certainly too late for Countdown 2010.

#### **4. How well is biodiversity protection incorporated into the policy-making process?**

- See above. Also, to emphasise again, incorporation is fine, paying attention to it and resourcing it is quite another matter.

#### **How well will the Ecosystem Approach Action Plan address this issue?**

- In Wales there is no Ecosystem Approach Action Plan, although one or two areas within Wales (eg National Parks) are hoping to develop their own in the absence of any strategic Wales-wide action plan. In the meantime, Britain remains very poor at ecosystem management. Only time will tell if the orthogonal obstacles are removed in order that everyone works together on this.

#### **Has there been enough progress in ensuring that the value of ecosystem services are reflected in decision-making?**

- No - because the tendency has been to focus upon sites and site features and not on the ecological processes that support the biodiversity infrastructure. Paradoxically, elements of the conservation profession have used designated sites as political weapons to demonstrate how well or poorly Britain is doing. These sites are at best genetic reservoirs; at worst, there are too few of them and

they're in the wrong place to make any significant contribution to ecosystem management. So developing a focus on ecosystems could undermine some of the weapons used by some quarters on the one hand, whilst drawing attention away from designated sites on the other.

## **Key threats**

### **5. What are the key drivers of biodiversity loss in the UK, and is the Government addressing them?**

- The combined effects of habitat fragmentation and climate change are two of the biggest problems facing wildlife. Habitat patches have become ever smaller and more isolated, causing local extinctions, disrupting natural processes and making it ever more difficult for species to move around the landscape. Climate change will accelerate these effects, as some populations may need to move to stay within climate ranges, or face extinction. Others might be able to remain in situ but are unable to because ecological quality there is too low.
- Modern agricultural practices continue to have a major negative impact upon biodiversity, from continued intensification of land use (and biofuels and biomass present a new potentially significant pressure) through to the neglect of marginal, but usually semi-natural, land. Fisheries policy and implementation is the major factor in the decline in the biodiversity of the marine environment. It remains to be seen whether or not the Marine Bill will adequately address these issues. Water abstraction for unsustainable consumption continues to rise, with no public link made between this and biodiversity conservation.
- The Government needs to be far more proactive in addressing these specific issues through:-
  - i) Ecosystem based agri-environment schemes which can also be extended to habitat targeting, and aimed at conservation of soils, water and carbon
  - ii) Government needs to re-define economic progress to include the biodiversity and ecosystem services on which it depends – a state of the environment GDP - , otherwise biodiversity will always be subjugated by conventional economic growth targets.

### **6. Will the Invasive Non-native Species Framework Strategy prove effective? Is there adequate regulation and resources to prevent further invasions and to undertake eradication programmes?**

- Climate change may force us to re-evaluate what constitutes native and non-native species as individual habitat and species climate spaces change. Habitat connectivity models currently being promulgated, with insufficient empirical evidence to support them, might also be a prime mechanism for the spread of undesirable invasive species. If we are serious about tackling invasives there is going to have to be not only a 'strategy', but also the funds with which to act upon it's recommendations. We have fought and lost numerous battles against individual species in our present piecemeal, under-funded fashion, e.g. grey squirrels, American mink, rhododendron. Some of these species will become better adapted in the face of climate change but also add to the difficulties faced by many native species when times are hard.

### **7. What impact will climate change have on UK biodiversity? How might the impacts of climate change be reduced? How can potential conflict between**

## **climate change mitigation and adaptation measures and biodiversity protection be effectively managed?**

- Climate change, including abrupt climate change, is of course not new; what is different this time is that climate change comes accompanied by many other human pressures on the environment and its inhabitants. Collectively these pressures reduce the options for natural adaptation precisely when those options are most needed. In other words the 'chronic' (i.e. long term and widespread) impact of climate change makes it even more important to sort out the 'acute' problems (i.e. the clear and present ones), which range from habitat fragmentation to energy-hungry food production to fuel poverty. So climate change adaptation will be served by a full range of conservation measures, not just those which are usually associated with climate change adaptation. But addressing these interacting symptoms will put huge claims on the NPAs' finite resources and the underlying problems need to be attacked in the most effective way.
- Significant/rapid change in the National Parks' landscape character is probable; either from unchecked climate change and/or from measures deployed to offset climate change. However, the latter are more potentially reversible. Relevant authorities will need to find ways of retaining landscape values and utility even as landscape character changes. This will require an understanding of those values (the European Landscape Convention is significant here), an understanding of the scope and deployability of the mitigation and adaptation assets within those landscapes (e.g. by county councils or regional development agencies). This will require a dynamic interpretation of Park purposes and a tolerance to new emergent landscapes.

## **8. Does planning policy adequately protect biodiversity? Are effective measures in place to ensure that Government plans for housing growth (including eco-towns) enhance rather than damage biodiversity? Should there be a review of greenbelt policy, and what might the consequences be for biodiversity? Do guidelines encouraging development on brownfield sites risk damaging biodiversity?**

- As a whole, planning policy is not very relevant to most of the issues affecting biodiversity. However, where it is relevant, planning policy does not explicitly promote or protect biodiversity, eg. the concept of green field sites is based upon open areas and limiting urban sprawl not on the quality of habitats and the health of species populations in the wider countryside. The growth imperative requires projections about how many new houses we need and how many new airport terminals we need rather than looking at environmental capacity and developing policy from that baseline. Planning policy in Wales, such as TAN 5 (as revised) views biodiversity in terms of how it will be affected by or can be enhanced within a development site, as a consequence of planning permission; biodiversity remains subjugated. A new approach is required.
- Given that the UK will fail on Countdown 2010, a different approach is required where development is sustainable and biodiversity-led. For example, Local Development Plans should include policies and zones FOR biodiversity restoration, water conservation, wetland restoration, flood control, woodland development and carbon sequestration.

## **Resources**

## **9. Are there adequate resources for biodiversity protection and enhancement?**

- Modern, standard farming and fishing practices lead to ecosystem exploitation and degradation, underpinning them are Government policies and finance. Resources allocated to biodiversity protection and enhancement can never do any more than slightly offset the pressures and losses derived from these activities. The way in which CAP is implemented in the UK favours large scale industrial farming at the expense of small scale mixed farms where pastoralism was the dominant feature. The community infrastructure which we rely on to deliver biodiversity targets no longer exists, in effect the tools for delivery have been removed. This will also have major implications with regard to the responses to food and energy security of supply threats following Peak Oil.
- We believe that the statutory agencies with responsibility for achieving biodiversity targets in national environment strategies have been severely undermined by reductions to their budgets.
- There is a huge gap between the action, and therefore resources, that are required to halt biodiversity loss and overcome the current status quo.

### **Protected areas**

## **10. Is the UK protected area network up to the job of maintaining biodiversity, now and into the future? Are arrangements to protect sites effective? Is more work needed to reduce habitat fragmentation and to link up those semi-natural habitat areas that remain?**

- The health of the UK's protected areas depends upon the areas in between them. Evidence (particularly from the Netherlands) demonstrates that corridors don't work on their own. The wider countryside must provide the connectivity between individual protected areas. In that scenario we would have a functioning pastoral ecosystem. In the meantime, however, we must continue to conserve our remaining sites (ie what's left of our precious semi-natural resource) and to link them up as much possible, creating more semi-natural habitats. This work is more urgent than ever before and is made harder by the fact that designated sites, such as SSSIs, were not and are not selected on the basis of their role within a functioning ecosystem.

If you have any further enquiries regarding our response, please feel free to contact me in the first instance.

Yours sincerely,



**Greg Pycroft**  
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**Welsh Association of National Park Authorities**