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A Living Wales

Introduction

The three National Park of Wales welcomes the opportunity to comment on the consultation '*A Living Wales*'.

Wales' landscape and wildlife are a reflection of changing relationships, over time, between people and the rest of nature. The proposal for a Framework is an acknowledgement of the interconnected physical, intrinsic and spiritual values of this rich inheritance. We warmly welcome the approach.

National Park Authorities have developed an increasingly 'joined up' approach to managing the special places, designated fifty years ago, that we were created to protect. We look forward to contributing our experience to the further development of the Framework. For example, the Framework recognises the need for greater connectivity between fragmented sites, in order to make the wider countryside more permeable to wildlife. We have long been pursuing this goal, supporting national initiatives through a locally-tailored combination of management agreements, owned or leased sites, advice and practical assistance. Snowdonia National Park Authority had successfully delivered a land management programme (Rhaglen Tir Eryri) jointly with CCW to manage some key sites in Snowdonia, Brecon Beacons National Park Authority was instrumental in developing and delivering on the Green Valleys Project and Pembrokeshire Coast



National Park Authority has also recently commissioned work from the West Wales Biodiversity Information Centre to map habitat connectivity, drawing on new techniques, in order to help target our efforts with even more precision.

Global failure to reach the 2010 biodiversity targets reflects the inadequate scale and insufficient nature of the conservation tools available. However, failure may also reflect the conflict in policy incentives which exist. By bringing together a broad set of values, we believe that the Framework could provide better cohesion in strategic policy terms and therefore enable the sustainable use of Wales' natural assets.

While it may not be possible for the Framework to immediately affect many of the factors affecting ecosystems, since these are often driven by UK and European policy, it can fulfil a critical role in spotlighting such policy anomalies and failures.

The development of the Framework coincides with a downturn in the economy and considerable squeeze on public spending. We believe that the measures required to deliver the Framework will be considerably more than those currently available to manage the Welsh environment. There is a danger that resources will be diluted overall and diverted from many of the existing approaches that organisations in the public and voluntary sectors undertake to support the environment across Wales, to the detriment of environmental outcomes.

However, the Framework could be used to provide a guide to funding priorities for the future, helping to ensure that resource allocation produces the best possible outcomes to support the Welsh environment.

While we appreciate the urgency of the Framework development process, we consider that it will take much longer than the six months allocated. We are also concerned that nothing should be missed as a result of the current 'in parallel' workstream arrangement (many of the workstreams depend on input from other workstreams). Review of the project plan may therefore be necessary if the Framework is to have the best chance of buy-in and success.

In further developing the framework the Assembly Government needs to ensure that it uses easily accessible language to enable people across Wales to develop an understanding and an engagement with the framework. An understanding of the Framework should not be restricted to experts and people working in the environmental field. For example using 'nature' or 'environment' instead of 'green and blue infrastructure'. The messages should be simpler and much more interesting and understandable. It should be an attempt to build a common view of the nature of Wales.

'Building the evidence base'

Adequate baseline data and monitoring is critical if organisations are to demonstrate success and identify failure. Extensive site- and programme-specific monitoring data exists for conservation efforts in Wales, as well as for other aspects of environmental quality.

However, to identify data requirements and gaps we need an all-Wales ecosystem plan as the primary driver of Framework delivery. This should include a set of objectives, which would in large part define the nature of the evidence required. The objectives (and therefore evidence) should also reflect regional and local distinctiveness in Wales, and should, we suggest, emulate the UK Common Standards for monitoring, by being based on ecosystem attributes. Objectives should be accompanied by structured milestones.

We would like to stress that Framework monitoring must be adequately resourced.

While there are undoubtedly a number of gaps in data collection, there may also be examples of duplication. There is a need to ensure that monitoring activity is as effective and efficient as possible. We would like data to be disaggregated where necessary into appropriate management units (such as National Park areas).

We believe that measuring progress via trends in success and failure factors is also essential. Not only is such trend monitoring a cost-effective adjunct to outcome monitoring, it also has a major advantage over outcome monitoring in terms of its predictive power. The physical impact of agricultural policies, for example, provides a key lead indicator of likely conservation outcomes, provided that clear and measurable objectives are set for such policies beforehand.

Ecosystem science is, and will likely always be, incomplete, and conservation management might therefore be thought of as an art based on science. The precautionary principle must be central to, and embraced by, the Framework, since it will rarely be dealing with absolutes. This will bring communication challenges - that is, opportunities to increase awareness.

Wales' four local records centres already play essential roles in conservation data management and interpretation. The centres are ideally placed to link policy outcomes and delivery of conservation efforts on the ground to monitoring and improvement of the Framework itself. This resource is not adequately promoted and utilised by the Welsh Assembly Government departments themselves in decision making and implementation on the ground e.g. Glastir.

'Valuing Ecosystems'

The societal value of ecosystem services depends on the level of understanding of what ecosystem services are. Placing an appropriate value on ecosystems depends upon this full understanding and a belief in this new framework.

Measuring the value of diverse natural functions using a common unit (such as the pound sterling) can help to highlight the value of natural assets in terms that people are familiar with.

However, while environmental valuation methods are widely used, their apparent objectivity conceals some very subjective methods. For example, how does someone value scarcity (which would generally increase market price), or apply discounting rates (which disenfranchise future generations) and so on? It is also difficult for people to make much sense of the large numbers which will inevitably be involved.

A brief example may illustrate another concern: if two habitats or systems (such as a restored post-industrial site and a degraded semi-natural woodland) were deemed overall to have equivalent monetary value, then in economic terms we would be indifferent between them. Even ignoring the future potential of each site, or that the necessary calculations could be agreed on in the first place, it is still impossible to imagine indifference between the sites, since the sites would always be inherently different. This inherent difference reflects the sites' intrinsic values - those attributes which have not, and can never be, incorporated into a financial calculation, but which are for most of us the largest and most significant part.

We should also remind ourselves that the National Park designation in Wales is an IUCN category V landscape where economic and human activity is expected and it is the interrelationship of human activities with the special qualities which is valued. Agriculture is the dominant land use in the Parks and primary food production in such areas should be acknowledged as part of the ecosystems services that are provided by the Parks. The context for such direct economic activity should be framed within a ecosystems services plan but also in National Parks within the agreed National Park Management Plan. Without the primary activity involved in agriculture the evolved ecosystems in such areas may not be sustained and potential loss in the special qualities of such areas.

We also doubt whether valuation will necessarily have the desired results, since the main drivers of human activity will still tend to be immediate and utilitarian rather than longer term, social values. Even putting intrinsic values to one side, an elephant may be 'worth', say, several hundred thousand dollars to eco-tourism businesses, but may also be worth a few thousand to a poacher. The risk is that the latter, more immediate value prevails.

This explains why protected areas and environmental legislation are almost invariably provided by government, reflecting society's need to protect natural

heritage, since protected areas and self-regulation do not tend to arise from the free market.

Rather than trying to represent environmental benefits in terms of a single numeraire, we suggest that the Framework should take what is in effect the opposite approach, and incorporate a far wider range of values into decision-making. This broader recognition of environmental values would actually have the effect of *reducing* the relative significance that monetary values currently exert in decision-making.

Such an appreciation will take time, and will depend critically on making people aware of the essential, and often invisible, functions that the environment provides, so that they can be valued in their own right. Here again National Park Authorities have a key role to play, inspiring people to care for the environment and encouraging personal, social and environmental responsibility through experience of the great outdoors. The Framework points the way to an enhanced role for Wales' National Park Authorities.

'Refreshing Regulatory and Management Approaches'

In the absence of an ecosystem plan for Wales, we believe it would be premature to comment in detail on regulatory and management change. We feel that this should naturally emerge from a structured planning process as the next stage in Framework development. However we have some general comments to offer.

The failure to achieve many biodiversity targets could erroneously be taken to mean that the existing regulatory regime is failing. We would tend to say that regulation is insufficient and disjointed rather than necessarily wrong. That is, the limiting factors affecting nature conservation success are more to do with inappropriate policy incentives and conflicting decision-making than regulation.

Accordingly, we see regulatory compliance as an essential but relatively minor component of success in terms of its further contribution, and believe that the Framework will not achieve its goals unless it becomes the catalyst for changing and aligning key policies. For example, the UK, and latterly Wales governments have shown too much discretion in implementation of the Habitats Directive. While regulatory and management agencies can provide support and advice, policy change is the responsibility of government at all levels. The National Park Authorities have important roles to play, helping to deliver national policy through our statutory planning function and conservation programmes, and sharing with Welsh and UK government our evidence and experience of what is and what isn't working.

The Natural Environment and Rural Communities Act 2006 (Section 40) duty on local authorities to "*have regard, so far as is consistent with the proper exercise of (authority) functions, to the purpose of conserving biodiversity*" must be

strengthened to require active *promotion* of biodiversity conservation and enhancement. Local authorities have a vital role to play in implementing the Framework and must be given those responsibilities.

Finally, we believe that there are huge savings to be made from rationalising conflicting policy. For example it could be argued that the Common Agricultural Policy provides support for economically unviable farm businesses which otherwise may deliver more environmental goods and allow those farm businesses to develop other strengths such as high nature value. Similarly, EU fisheries policy sustains fishing fleets that continue to pose a threat to the marine environment.

'Refreshing Partnership Mechanisms and Institutional Arrangements'

There should be a plan as a precursor to a lot of the questions under this heading. We believe that it is important to define what the framework is.

Whatever the final result is of the restructuring exercise, the 3 Welsh National Park Authorities should continue to have a critical role in the management of the Welsh environment as we have a very intimate and practical relationship with those that live in and visit 20% of the area of Wales. We are also committed to engaging with and enthusing people in the parks to promote healthier ecosystems and better conservation land management.

Conclusion

We welcome the development of a Natural Environment Framework for Wales and consider that National Park Authorities have extensive experience to input to the development of the Framework and will hopefully have a central role in the further development of the Framework. However, we have highlighted a few areas of concern that the Assembly Government should consider as it works with partners to develop the Framework. The three Welsh National Park Authorities would welcome the opportunity to assist in this work.

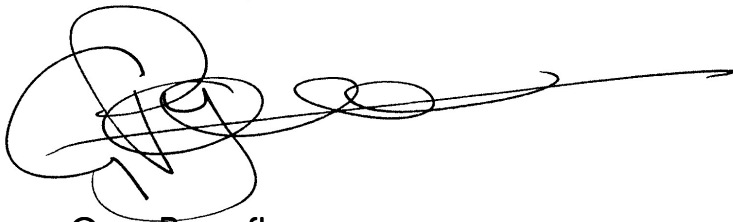
To summarise our comments are as follows:

- Agree to the principle of a Framework
- A framework should be used to prioritise resources in future years
- An all-Wales ecosystems plan requires sufficient data to inform it
- Regional and local priorities should be reflected in a plan
- Data should be disaggregated to management units within Wales, National Parks identified as such management units
- The Framework should acknowledge primary food production and the dependence of ecosystems approach on such systems
- The Framework should engage and influence primary land management systems
- The precautionary principle should be adopted within the Framework

- The local record centres should be supported in enabling the Framework to be as effective as is possible
 - National Park Authorities have a key role to play in developing and implementing the Framework
 - An ecosystems plan for Wales should first be in place prior to consideration of Regulatory and Management approaches
 - National Park Authorities have an important role to play through their statutory planning function
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Once again, may we thank you for the opportunity to comment. This response was agreed between the relevant Officers within the three Welsh National Park Authorities; however should you wish to follow up or discuss any of the points raised in further detail please contact me in the first instance.

Yours sincerely,

A handwritten signature in black ink, consisting of several overlapping loops and a long horizontal stroke extending to the right.

Greg Pycroft
Welsh Policy Officer