



NATIONAL PARKS WALES  
Britain's breathing spaces

Ms Kirsty Williams AM  
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Dear Ms Williams

## Inquiry into Biodiversity in Wales

Thank you for this opportunity to contribute to the inquiry you are undertaking into the condition of biodiversity within Wales.

### Introduction

The Brecon Beacons National Park Authority (BBNPA); the Pembrokeshire Coast National Park Authority (PCNPA) and Snowdonia National Park Authority (SNPA) manage the three National Parks in Wales.

National Parks have two statutory purposes set out within Section 61 of the 1995 Environment Act:

- conserving and enhancing the natural beauty, wildlife and cultural heritage of the areas;
- promoting opportunities for the public understanding and enjoyment of the special qualities of those areas by the public.

In carrying out these responsibilities the National Park Authorities (NPAs) shall to seek to foster the economic and social well-being of their local communities. They are independent local authorities operating within the local government framework.

The Welsh Association of National Park Authorities (WANPA) is the partnership of the three NPAs that raises the profile of issues affecting National Parks and co-ordinates the dissemination of NPA expertise to applicable policy.

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BRECON BEACONS  
NATIONAL PARK



Parc Cenedlaethol  
Arfordir Penfro  
Pembrokeshire Coast  
National Park



SNOWDONIA  
NATIONAL PARK



2010 Blwyddyn Rhyngwladol Bioamrywiaeth  
2010 International Year of Biodiversity

In 2008 WANPA responded to an inquiry undertaken by the UK Parliament's Environmental Audit Committee which you will find at the rear of this response. Please note that that response has formed the basis of our response to the Sustainability Committee. This is a not too positive indication of the level of progress made over the intervening 24 months.

### Response to the Sustainability Committee's Questions

#### **What delivery mechanisms were in place to achieve the 2010 targets? Why did these fail to deliver?**

There were very few mechanisms to help Wales meet the 2010 Biodiversity targets, and those that did exist focused too narrowly on specific sites, species or features to make any meaningful impact.

At a national-level delivery mechanisms lacked any strategic coherence. There was no Ecosystem Approach Action Plan, although one or two areas within Wales (eg. The National Parks – covering 20% of Wales) are hoping to develop their own in the absence of any Wales-wide Strategy and Action Plan. In the meantime, Britain as a whole remains very poor at ecosystem management. The tendency has been to focus upon sites and site features and not on the ecological processes (ecosystem/landscape services) 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 are in the wrong place to make any significant contribution to ecosystem management.

Where policies and Plans do exist, such as the UK Biodiversity Action Plan (BAP), they are ineffective since it is inefficient and process driven. The plan has not galvanised enough significant action amongst those who would not be working for biodiversity anyway, it has failed to change working culture and practices, and it does not 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.

We fear that devolved administrations in the UK have contributed to the general perception of a fragmented and incoherent approach to the formulation of policy and its implementation (this is particularly a problem in the marine environment – we hope the Marine Act will resolve this fragmentation). Within Wales there has been a lag whilst the Wales Biodiversity Partnership has found its feet, but it is now in good shape and making useful decisions.

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 (i.e. modern farming practices and their impacts on biodiversity in the wider countryside).

At a local level we note that some progress is being made. The Welsh Assembly Government's requirement for every local authority to field a Biodiversity Champion,

ideally at Member level is commendable, but we fear it has not run for long enough to have any real impact. The Welsh NPAs have led Wales in appointing Member Biodiversity Champions. Through the BBNPA, biodiversity member champion training has been provided to all south Wales LPAs and will be provided to all north Wales LPAs during 2010.

The Wales Biodiversity Partnership has the potential to help achieve good biodiversity outcomes, for example through the establishment of national habitat groups and the influence that these will now have on LBAP outcomes. This might not be the outcome however where LBAP officers are still on fixed or short term contracts rather than permanent contracts.

The four local records centres Cofnod (North Wales), WWBIC (West Wales), BIS (Powys and BBNP) and SEWBREC (South-East Wales), provide Wales with total geographic coverage for biodiversity data management. Yet this service is not widely understood or used by departments within the Welsh Assembly Government, with notable exceptions such as trunk road agencies.

As far as practical conservation measures are concerned 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 (The Welsh Institute of Countryside and Conservation Management) are looking at ways to address this issue. Natur is a not-for-profit company limited by guarantee. It is the professional institute for countryside and conservation staff in Wales, covering land and sea. It is run by an elected board of directors and overseen by a Council that includes CCW, EAW, RSPB Cymru, National Trust Wales, FCW, LANTRA, the three NPAs and the Wildlife Trusts.

Across the UK, take up of the Biodiversity Action Reporting System (BARS) has been patchy, afflicted by an aversion to database management within the nature conservation movement. Within Wales, uptake is better, with training provided by BBNPA on behalf of the Wales Biodiversity Partnership to south Wales LBAP officers for example.

Living up to the outcomes that arise from regulatory assessment recommendations (HRA, SEA, SA) requires a wholesale change to the commitment and resources provided towards biodiversity surveillance and monitoring by the competent authorities. There should be an exacting requirement made on such authorities in fulfilment of NERC duty (see below).

The planning system can also play a role, and where it is relevant to the promotion of biodiversity we believe that there is significant room for improvement. The revision of TAN5 is useful but we suspect that its application is patchy. It also fails to provide sufficient clarity on how to apply the Habitats Regulations correctly. Generally, the tools are there in the planning system for integrating biodiversity mitigation, compensation and enhancement into new developments but there is not sufficient understanding of these tools or confidence in them to be used effectively. Planning Policy Wales probably asks far more of local planning authorities than they achieve for biodiversity. The modern challenges of continuing decline in biodiversity, mitigating and adapting to the effects of

climate change, and energy descent pathways all affect and are affected by the planning system. The NPAs seek to capture these different issues through the application validation process, for example by requiring sustainability assessments and ecological surveys prior to validation. Local development plans will also set the policy context by which these issues will be evaluated.

The Habitats Regulations implement the EC Habitats Directive. In Wales and the UK the implementation of Article 6 (designation of SACs) has taken place at the expense of Article 10 (conservation of biodiversity in the wider countryside). This shortcoming is recognised in the Natural Environment Framework now being developed by the Minister for Environment, Sustainability and Housing.

### **Is the current approach to dealing with climate change mitigation and adaptation in Wales sufficiently integrated with policies for biodiversity?**

Climate change, including abrupt climate change, is of course not new; this time contemporary climate change is accompanied by many other human pressures on the environment. The cumulative effect of these pressures reduces the number of options available for natural adaptation precisely when they are required. The 'chronic' (i.e. long term and widespread) impact of climate change makes it even more important to tackle the 'acute' problems (i.e. those that are clear and present). These range from habitat fragmentation to energy-hungry food production to fuel poverty. Climate change adaptation and the promotion of biodiversity will be best served by adopting an holistic, ecosystem approach to the problem. Addressing these interacting symptoms in such a way will put huge pressure on the finite resources of public bodies such as the NPAs.

Adopting an ecosystem approach to biodiversity conservation and landscape management, as opposed to the current site and species-specific approaches will require new skill sets and additional resources. This may take a generation to achieve (and National Parks are suited to this kind of timeframe) but closer, unified working relationships between the statutory agencies; local authorities; NPAs, and the research institutes such as universities, would provide a cost-effective way of pooling limited resources whilst sharing skills. With the Welsh Institute of Countryside and Conservation Management in place, there is also the potential to provide a unifying, coherent career structure.

The combined effects of habitat fragmentation and climate change are two of the biggest problems facing wildlife. Patches of adequate habitat are becoming smaller and more isolated, threatening the resilience of local populations of species. Natural processes are disrupted and mobile species have great difficulty moving around the landscape. Climate change will accelerate these effects, as some populations may need to move to remain within tolerable climate ranges, or face local decline or extinction. Others might be able to remain in situ but are unable to do so since ecological quality is too low.

Additionally, the effects of declining fossil fuel supplies and the shift to alternative fuels and energy sources (the energy descent and transition), will affect our continuing ability to manage important habitats and ecosystems. Currently, management includes human intervention, usually in the form of petrol- or diesel-driven machinery, either by conservation organisations or more widely as part of daily farming practice. Declining

fossil fuel supplies and/or increasing fuel costs will affect the cost-effectiveness of these methods. They will also affect the cost-effectiveness of farm businesses that remain heavily dependent upon machinery and hydrocarbon-based additives such as fertilisers and pesticides. The water shortages anticipated by the Environment Agency Wales as a consequence of the combined effects of climate change and continued levels of abstraction, will also affect farming and the condition and long term status of important wetland habitats. It is unclear what the outcome will be in the countryside from this 'perfect storm' of environmental, energy and economic change. On top of this is the current review of the LFA, further CAP review and uncertainty over the likely uptake of Glastir under these circumstances. The emergence of a Natural Environment Framework may prove to be very timely.

Under these circumstances, significant/rapid change in the landscape character of the National Parks is probable; either from unchecked climate change and/or from measures deployed to offset climate change and fuel changes. However, measures deployed are more potentially reversible than natural responses to change. 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) and an understanding of the scope and deployability of the mitigation and adaptation assets within those landscapes (e.g. by county councils or relevant agencies). This will require a dynamic interpretation of National Park purposes and a tolerance of new, emergent landscapes.

The Natural Environment Framework (NEF) being developed by WAG will focus on an ecosystem approach to spatial planning and landscape management in Wales, rather than on the ecosystem services provided per se. This will require a wholesale shift in emphasis and understanding on how landscapes work. Wales' biggest and most important natural resources are water, landscape, soil, biodiversity and people, underpinning all services provided. Valuing, conserving, restoring and enhancing the ecological functions within ecosystems require a very different psychological approach, less reliant on technological fixes and based upon a different language. This language will talk about what is required to maintain and enhance ecosystem function and how the human species can live within these limits, rather than the orthodox approach of seeing how much of a natural resource can be exploited before it is bust, whilst relying upon technology to fix things at an increasing cost. This introduces the concept of the ecological footprint in a fundamental way where the most cost-effective approach will also be the most ecologically beneficial or benign.

We therefore propose that the Government needs to be far more proactive in addressing biodiversity loss and climate change through a combination of:

- i) Ecosystem based agri-environment schemes which can also be extended to habitat targeting, and aimed at conservation of soils, water and carbon
- ii) Ecosystem-based public awareness and understanding initiatives, through the NEF.

## **What examples of good practice are there elsewhere in the UK and internationally that Wales can learn from?**

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 will have a functioning pastoral ecosystem. 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 as possible, and to create more semi-natural habitats.

The Moors for the Future Partnership, in the Peak District National Park, is a multi-disciplinary project that aims to restore large areas of degraded upland bog and moorland. (<http://www.moorsforthefuture.org.uk/mfff/main/Home.htm>)

The Peat Compendium provides a summary of peatland conservation and restoration projects underway in the UK (<http://www.peatlands.org.uk/>)

The LIFE Peatlands Project in Scotland has been running since the early 1990s, with repeated funding provided by the EU LIFE fund (<http://www.lifepeatlandsproject.com/>)

There are numerous whole-river restoration projects underway globally; a Google search of the words "river restoration project" will identify a sample of the best known. There are very few unadulterated, natural river systems in the world; there are few (if any) in Wales since our rivers are likely to be ecologically degraded; and subject to low flows, and therefore prone to more flash flood events than they would be if they were in good ecological status.

Yet Wales is almost entirely dependent upon rain-fed, surface water flows for its water supply, and parts of Wales will be short of water within the next 30 to 50 years for significant periods of the year. These might well be the same parts that are also more vulnerable to flash floods in future. The Pitt Review into the causes of the 2007 floods advised that England and Wales should work 'more with the grain of nature' in mitigating and preventing future floods. In short this means restoring wetlands in the uplands and lowlands, and expanding Wales' broadleaf woodland cover. The Rural Affairs Minister has recently announced Wales' intention to expand Wales' woodland cover by 100,000 hectares. The Welsh Assembly Government could also choose to make river and floodplain restoration projects a national priority for the foreseeable future.

The Hubbard Brook Ecosystem Study is probably the longest running whole watershed ecosystem study in the world (<http://www.hubbardbrook.org/>).

## **What are the implications of emerging international targets for 2020 and beyond?**

This is a good question to ask during the International Year of Biodiversity. It is also a complex question to answer. The EU is developing a new biodiversity conservation strategy, so this will clearly have a direct bearing on government in Wales. The implications of the emerging targets are likely to include:

- More importance must be placed on biodiversity conservation as an integral component of sustainable development
- Sustainable development requires us to live within our means; for biodiversity, this means that we must understand ecological carrying capacities
- To understand carrying capacities, we must understand ecosystems
- The Millennium Ecosystem Assessment, followed in the UK by the National Ecosystem Assessment, will give devolved administrations an approximate handle on what are the essential ecosystems to maintain life
- Understanding and evaluating ecosystem services will become synonymous with good governance.

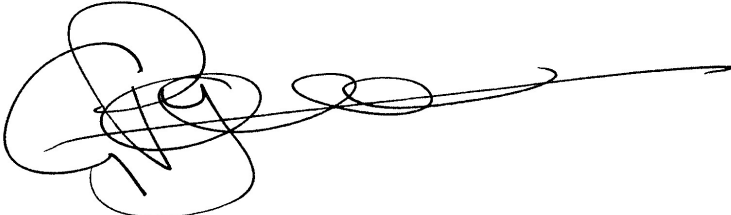
The implications of how Wales responds to these targets might include:

- More investment in biodiversity conservation as an unashamed selling point for Wales, within the UK and beyond.
- Higher social and economic value given to biodiversity and natural resources; e.g., what about a biodiversity land evaluation scheme equivalent to the agricultural land evaluation scheme?
- Utilisation and development of emerging market mechanisms to value natural resources.
- Increasing opportunities to attract private sector investment into biodiversity, natural resource management and farming (linking to corporate environmental responsibility portfolios and responding with tax incentives to invest in natural resource management), supporting a more entrepreneurial approach to the previous subsidy-driven and agri-environment-supported industry.
- Increasing entrepreneurial opportunities for farmers and other land managers to undertake integrated land management rather than just food production
- Successors to Glastir that can encourage and support a more entrepreneurial approach to land management.
- Less cash available within the RDP owing to CAP review diverting more cash to other nations, requiring more entrepreneurship in farming and integrated land management in order to maintain incomes, attract inward investment and meet the demands of more environmentally-savvy consumers.
- LFA inclusive of high nature value farms.
- Ecosystem services are common currency, with their value measured in terms of the quality of the relevant ecosystem at a particular location (e.g., poor, fair, good, outstanding) and the 'quantity' of that ecosystem available
- Resilience and self-sufficiency within settlements is well established in response to energy descent demands; alternatively, too many people suffering real fuel poverty because the transition has not been achieved widely or deeply enough.
- A greener economy will require more environmental and ecological expertise; a real growth opportunity for Wales' employment market in a country where the environment is so integral to life and Wales' global image.
- Government response to the above co-ordinated through a Natural Environment Framework.

Once again, thank you for the opportunity to comment. This response was agreed between the relevant specialist officers within the three Welsh National Park Authorities;

however should you wish to follow up 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 loops and a long horizontal stroke extending to the right.

Greg Pycroft  
Welsh Policy Officer