

REPORT OF THE HEAD OF CONSERVATION

SUBJECT:

WELSH ASSEMBLY GOVERNMENT CONSULTATION – ‘A LIVING WALES’ (THE NATURAL ENVIRONMENT FRAMEWORK)

Purpose of Report

This report seeks PCNPA Members’ endorsement for a response on the Welsh Assembly Government’s consultation ‘*A Living Wales*’.

Introduction/Background

The Welsh Assembly Government is proposing a new framework for management of Wales’ environment, countryside and seas.

The framework is intended to unite the diverse range of environmental initiatives in Wales under a general aim of ecosystem protection and recovery. The Framework may have a significant impact on our work over the next few years and this paper seeks to give Members an early opportunity to be informed on the Framework and to contribute towards a response.

The ‘front end’ of the consultation, ‘*A Living Wales*’, is relatively brief and consists of four groups of questions; there is, as yet, no detailed Natural Environment Framework to comment on. A copy of ‘*A Living Wales*’ can be found at the website address given at the end of this report.

The consultation is supported by a background paper known as ‘Narrative 5’, which, as the name suggests, has undergone several informal rounds of consultation and input. ‘Narrative 5’ sets out much of the rationale for adopting an ecosystem framework.

Annex A includes a draft response to ‘*A Living Wales*’. We will share this response with the other two Welsh National Park Authorities and may submit a joint response.

Biodiversity implications/Sustainability appraisal

The Natural Environment Framework envisaged by ‘*A Living Wales*’ should provide an improved national policy context for conservation and should therefore be entirely supportive of and complementary to National Park Management Plan goals.

It also has the potential to provide a strong affirmation for the nature conservation approaches that this and other National Park authorities have pursued over the years.

Recommendation

Members are invited to comment on the draft response included as Annex A.

Background Documents

- Welsh Assembly Government, 2010, Consultation document: A Living Wales: A New Framework for Our Environment, Our Countryside and Our Seas
- Welsh Assembly Government, 2010, Towards a New Natural Environment Framework – A Background Paper

Documents available from

<http://wales.gov.uk/consultations/environmentandcountryside/eshlivingwalescons/?lang=en>

For further information, please contact Mike Howe on 01646 624830.

Authors: Mike Howe, Michel Regelous

Annex A

Response from the Pembrokeshire Coast National Park Authority on the Welsh Assembly Government consultation “A Living Wales”.

Introduction

The Pembrokeshire Coast National Park Authority 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. 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, failures also reflect the perverse economic and policy incentives which exist, and the continued subservience of the environment to the goal of indiscriminate economic growth. By bringing together a broad set of values, we believe that the Framework could provide a unifying banner for Welsh economic policy, as well as for conservation, based on truly sustainable use of Wales’ natural assets.

While it may not be possible for the Framework to directly control 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 and highly effective approaches that organisations in the public and voluntary sectors undertake to support the environment across Wales.

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 is 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.

'Building the evidence base'

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. This was not the case with Tir Gofal, which had unsatisfactory outcome and compliance monitoring.

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.

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.

'Valuing Ecosystems'

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 one 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 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 (tellingly) 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.

'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 be taken to mean that the existing regulatory regime is failing. We would tend to say that regulation is insufficient 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 key policies. While regulatory and management agencies can provide support and advice, policy change is the responsibility of government at all levels. The National Park Authority has 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 agricultural policy props up some unprofitable farm businesses at the expense of the environment, while constraining the ability of those farm businesses to develop other strengths such as high nature value. Similarly, EU fisheries policy props up fishing fleets that continue to damage the marine environment.

'Refreshing Partnership Mechanisms and Institutional Arrangements'

We have no comments at this point.

Conclusion

We welcome the proposed Natural Environment Framework and consider that the skills and experience of the Pembrokeshire Coast National Park Authority can help in its development and delivery.

We look forward to continuing to work with the Welsh Assembly Government and our other partners to maximise the potential which the Framework affords.