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Welsh Government White Paper Number: WG19631

Towards the Sustainable Management of Wales' Natural Resources

Comments of the Cambrian Mountains Society

The Society welcomes this opportunity to comment on the White Paper, *Towards the Sustainable Management of Wales' Natural Resources*, which it sees as part of an important Welsh Government initiative to build a more resilient and sustainable future for Wales. The Cambrian Mountains Society seeks ways to positively engage with the Welsh Government as there are common concerns and, possibly, solutions that can be jointly supported. There are also matters on which the Society will disagree but it is hoped that, through discussion, satisfactory outcomes can be agreed.

The Society was established in 2005 and now has a membership of just under 400 representing people from all backgrounds but with a common interest in the future of the Cambrian Mountains. It aims to encourage cooperation across three different Unitary Authorities which happen between them to span what is in reality a single geographical entity. (Regional Landscape Character Map for Wales Area 21)

The objectives of the Society include promoting, for the benefit of local communities and the wider public, measures which will sustain or enhance the landscape, natural beauty, biodiversity, archaeology, scientific interest and cultural heritage of the Cambrian Mountains.

The economy of the Cambrian Mountains is heavily dependent on tourism, agriculture and forestry and is likely to remain so. All three sectors knit closely into the environment and it is in this context – the mutually supportive links between economy and environment – that we wish to comment on the White Paper. The thinking that lies behind our comments is outlined in our document *Cambrian Mountains – The Heart of Wales: Developing a Strategy for a Sustainable Future*

<http://www.cambrian-mountains.co.uk/documents/cambrian-mountains-sustainable-future.pdf>

In particular we want to see in the Cambrian Mountains a strategy that will protect and possibly enhance its outstanding landscape as well as offering a firmer foundation for the rural economy of the region. Through the provision of a range of ecosystem services the Society sees a future for the Cambrian Mountains that is not forever dependent on the goodwill of urban society to provide it financial support.

Following from our previous comments to the Green Paper, *Sustaining a Living Wales* we are still concerned that WG, in developing the ecosystems approach, has paid insufficient attention to the outstanding quality of large parts of the Welsh countryside. Neither has the Paper fully acknowledged the provision for quiet recreation and tranquillity that landscapes such as the Cambrian Mountains provide in plenty for both the people of Wales and its visitors.

On the following pages you will find our comments to a number of the questions raised in the Paper's response document. You will find after an initial comment to Chapter 1 (Introduction) we have only replied to questions which we regard as within our area of interest. We have, however, kept to your document's numbering system for ease of analysis.

Chapter 1 – Introduction

Comment: The Cambrian Mountains Society (CMS) acknowledges that a more integrated framework may be needed for the sustainable management of Wales' natural resources but it is worried that this force for change is driven more by short term expediency rather than in conserving the Nation's rich mix of terrestrial and marine ecosystems, land and seascapes. With this White Paper Welsh Government (WG) seems intent on dismantling the raft of successful environmental legislation which has evolved over the last century. Furthermore we do not consider that the post war Government in 1949 drew up the National Parks and Access to the Countryside Act in response to specific environmental problems' but rather as a pledge to protect, the most outstanding landscapes of England and Wales. CMS are convinced that NPs and AONBs still have a vital role to play in conserving Wales' best countryside. As such we ask that the forthcoming Environment Bill not only affirms WG's continuing support for existing Protected Landscapes but also includes provision for further designations of both AONBs and NPs. We, of course, will be continuing our campaign for the Cambrian Mountains to take up its rightful place in the Welsh family of 'Living Landscapes'.

The Society recognises that the ecosystem approach, which the White Paper is advocating, has merit and WG should pursue it further but not at the expense of other well regarded designations such as National Nature Reserves and Sites of Special Scientific Interest. Linked to this we would like to point out that when the Convention for Biological Diversity introduced the ecosystem approach its major objective was to halt losses in biodiversity and habitat. The 'bolt on' ecosystem services that the approach also puts forward were to be seen as bonuses rather than drivers. We also challenge WG's blanket use of the term 'natural resources'. Surely Natural Resources Wales, the body WG established partially to manage the new approach, should hold a duty of care for the natural wonders of Wales. Wonders such as; the scattered ageing birch trees of the Elenydd, essential niches of the rare Welsh Clearwing Moth, the temperate rainforests of the west seaboard, rich in bryophytes and lichens and the dark skies over Mynydd Mallaen lit only by the Milky Way. These, and countless others, should not be taken merely as resources but as gems of the Welsh landscape and its biodiversity.

Chapter 2 - Natural Resource Management

Question 1

Do you agree with the overall package of proposals in relation to natural resource management in chapter 2? No.

Comment: CMS are very worried that the White Paper exclusively puts forward catchment areas as a means of organising the management of natural resources. In our opinion a river basin does not always pull together either the overall shape of the landscape or its cultural ties. We refer WG to the excellent work of the former Countryside Council for Wales (CCW) in drawing up the 'Landscape Character Map for Wales' as part of its LANDMAP geographical information system. In CCW's preamble to the map they say that 'Wales divides into 48 regional scale landscape character areas. Each has a distinctive sense of place that enables us to recognise it as a single area'. In our opinion using these character areas, perhaps amalgamating some of the smaller ones for ease of administration, would be a more effective way of caring for and perhaps even sustainably using each areas' natural capital. Referring to our previous response to the Green Paper, *Sustaining a Living Wales* can we point out that WG again seem to be paying little attention to the European Landscape Convention which the UK Government signed up to in 2006. This crucial piece of environmental legislation places a duty of care on each signatory for all its landscapes. As such any legislation that WG puts in place must hold to this binding piece of European legislation.

Question 2

Do you agree with the approach to define natural resources, sustainable management of natural resources and integrated natural resource management in Wales? No.

Comment: The Society at least needs to see a full and clear list of what WG see as natural resources before it can agree with this approach. For instance we are concerned by your term 'geologic' in section 2.17. As this definition appears on the same line as 'landscape' do we take it that WG will be coordinating the maintenance, enhancement and uses of geological features in the landscape or does it mean that it will be merely overseeing the extraction of minerals? Similarly by 'air' and 'water' in the same section does the Paper mean maintaining the integrity of these resources or just setting up General Binding Rules to permit energy capture from their movement?

The Society also have concerns over the how WG will operate 'a planning and priority setting process that coordinates resource use so that the long term sustainable benefits are optimised for the people, environment and economy of Wales in the present and in the future'. We might then expect the Paper to consider how WG intend to tackle the problem of competitive uses of these resources. We can, however, find no reference to this important detail.

Question 3

Do you agree that climate resilience and climate change mitigation should be embedded into our proposed approach to integrated natural resource management at both national and local levels? Yes but with reservations.

Comment: CMS agree that climate change is a major challenge facing the people of Wales and Worldwide. We believe that Wales' uplands can play an important role in mitigating climate change via enhanced sequestration of carbon in their active peat and woodland reserves. We are not at all convinced that WG's preference for wind farms sprawling across our most iconic landscapes is the answer!

Question 5

Do you agree that the area-based approach will help provide a clear, prioritised and focussed approach to delivery? No, not if the areas are based exclusively on catchments.

Comment: See our response to question 1.

Question 6

Do you agree that the approach is flexible enough to enable significant elements of the plans for natural resource management to be replaced in the future? Negative concern.

Comment: The Society is concerned that the White Paper is rather a broad brushstroke, with few details of the working regulations needed for the successful implementation of such far reaching change. We fear that all secondary legislation evolving from the Environment Bill will receive insufficient public consultation and scrutiny and as such have an easy passage through Senedd.

Question 7

Do you agree with placing a requirement on other public bodies to co-operate in the area-based approach? No.

Comment: Whilst it is difficult to see how the approach will operate without cooperation between public bodies CMS feel that this requirement is rather draconian and should not be put in place without extensive consultation.

Question 8

Do you agree that NRW should be the lead reporting authority for natural resources? No.

Comment: NRW should consider the Joint Nature Conservation Committee (JNCC) as co authors. The JNCC is the statutory body that advises both UK Government and devolved administrations on all matters to do with nature conservation and natural resources.

Question 9

Do you have any comments on the impact of these proposals (for example, impacts on your organisation)?

Comment: Please see back to the opening comments of this response. The Society feels that very little attention is paid in the White Paper to the immense contribution that both NPs and AONBs have made in the protection of Wales' finest landscapes, their wildlife and sense of place. We hope that the forthcoming Environment Bill addresses this oversight. Also, as an organisation which sees recognition of the Cambrian Mountain's as an AONB as the most appropriate way to protect these iconic hills we hope the Bill includes a mechanism for making further designations. Here we refer you back to CCW's Pathfinder report of 2009 which strongly supported the case for the 'Cambrians' to be designated as an AONB but as yet WG has not followed up.

Chapter 3 - Natural Resources Wales – new opportunities to deliver

Question 10

Do you agree with the proposals set out in chapter 3 in relation to new ways of working for NRW? No.

Comment: We need more detail on these ways of working before we can agree to them. CMS also consider that many of the old ways of working have much to commend them and should not be cast aside for the sake of the new.

Question 11

What limitations or safeguards on the use of powers might be necessary to enable NRW to trial innovative approaches to integrated natural resource management?

Comment: NRW must be seen as an independent agency not merely as an extension of Welsh Government. All innovative approaches including ones originating from within NRW, those coming from agencies close to WG as well as those passed down from ministries within WG, must be independently scrutinised before the agency commits further resources to them.

Question 12

Do you agree that NRW are an appropriate body to act as facilitators, brokers and accreditors of Payments for Ecosystem Services Schemes? No.

Comment: This does not allow an organisation such as a Wildlife Trust or landscape NGO with a well researched ecosystem project to approach NRW for backing. Here we have in mind innovative landscape approach projects already proving successful in Wales. With its Pumlumon Project the Welsh Wildlife Trust should be seen as an exemplar of how NGOs can be both facilitator and broker of a PES scheme. The Montgomeryshire Wildlife Trust, who are the lead partners in this project, are working not only to restore biodiversity of this upland area but also facilitating; carbon locking, alleviating downstream flood damage, diversifying farm income and improving tourism facilities. We also believe that this Trust are acting as brokers of the ecosystem services that they are developing. The National Trust is also facilitating important landscape scale conservation work on its Abergwesyn Common property as are the Elan Valley Trust in the Elenydd. It is worth pointing out

here that all three of these groundbreaking schemes are happening in the 'Cambrians'. CMS are convinced that they and future ecosystem approach projects in these hills would benefit from working within a Protected Landscape as they seek backing for their work.

Question 13

What should be the extent of NRW's power to enter into management agreements?

Whilst not a management agreement, NRW should work as an accreditor and monitor of those taking part in the Glastir agro environment scheme. This should especially be the case as WG are shifting a greater fraction of CAP funding from the Pillar 1, Single Farm Payments, to the more conservation based work of Pillar 2.

Chapter 6 – Implementation

Question 41 (paraphrased)

Will the Environment Bill be reflective of Welsh Citizens' needs?

Comment: As well as questions on equality citizens may want to express their views on other issues raised in the White Paper. What mechanisms will WG put in place to meet this need for ongoing dialogue?

Yours,

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6th January 2014.