

Inquiry into Biodiversity in Wales

Ceredigion County Council welcomes the opportunity to provide comment on The Assembly's Sustainability Committee inquiry into biodiversity in Wales and the reasons why Wales has missed its own and the EU's biodiversity targets for 2010.

Ceredigion County Council is committed to improving and protecting the sustainable quality of life for its citizens and has measures in place to protect and provide a sustainable environment. The natural environment in Ceredigion is one of the County's greatest assets and has a direct impact on communities and citizens' quality of life, including their health and wellbeing, and that of future generations. The Council recognises this and endeavours to protect, nurture and enhance the excellent quality of the local environment.

In response to the specific questions raised we make the following observations:

1. What delivery mechanisms were in place to achieve the 2010 targets?

Legislation since 1949 has given local authorities a significant role in nature conservation and, recently, in the maintenance of biodiversity, in, for example:

- The National Parks and Access to the Countryside Act 1949
- The Countryside Act 1968
- The Wildlife and Countryside Act 1981
- The Countryside and Rights of Way Act 2000
- The Local Government Act 2000
- The Natural Environment and Rural Communities Act 2006
- Various European directives implemented through UK Regulations

Within local authorities there is the LBAP, SAC Management Plans, Community Plan, Sustainability Strategy, PPW/TAN 5, UDP/LDP, SINC's, and management of local authority land, including LNR's, to help deliver these targets.

In addition there is a plethora of Government and non-government organisations involved in delivering biodiversity work through terrestrial & marine management (e.g. CCW, EAW, FCW, WAG, National Parks, and Wildlife Trusts etc.) Groups such as WBP, LBAP Partnerships and SAC Relevant Authority/Liaison forums provide co-ordination networks.

2. Why did these fail to deliver?

Over-complexity. Nearly twenty years ago, the Chief Conservation Officer of the IUCN warned that our approach to conservation had become over-complex and bureaucratic with an over-emphasis on report and plan production that resulted in the public becoming alienated from supporting conservation work. Since then the situation could be said to have worsened with a range of new environmental legislation and initiatives that organisations and their staff have had to absorb and integrate into their duties and practices.

Focus on process rather than action. LBAP staff are often bogged down in BAP production and review rather than action. The resources that were made available tended to be used for plan production, leaving little left for plan implementation. Similarly, central resources have been directed to agencies such as WBP to co-ordinate and disseminate information, rather than to practical habitat and species work.

Under recording Many organisations undertake positive biodiversity management that is not part of the formal BAP process and may go unrecorded. They have a requirement to record data within their own internal information systems and are reluctant to repeat the effort by entering it into BARS as well, CCW being a prime example. WBP are working towards resolving this issue, trying to integrate these organisations internal recording systems with BARS, however, this is an on-going process which did not feed in to the 2010 target.

Lack of baseline biodiversity data. It is difficult to record whether targets have been met when there is a lack of baseline data to support this on. Resources for monitoring are few and far between. In addition, funding for practical projects often don't allow for monitoring of the site before the work and after.

Biodiversity message not being understood. There is still a general lack of understanding of the importance of biodiversity to our economy, health, education, community, culture, etc. Biodiversity loss will affect the very framework within which our economy functions. The public, industry and developers will probably only support, and engage in, action for sustainable development and environmental protection that can be seen to be in their interest. We are failing in communicating properly and making the links that will make people want to change their actions.

Lack of policy integration at both WAG and LA level - ecology has been regarded as a 'fringe' activity, even within the sustainability framework. Biodiversity needs to be seen as an integral part of sustainability policies and outcomes.

Limited resources for biodiversity work and spread too thinly across agencies. Local Authorities have struggled to meet their biodiversity duty under NERC as there have been no additional budgets made available for ecology/biodiversity for NERC implementation. There are limited resources to maintain LBAP momentum (short-term LBAP post contracts resulting in high staff turn-over etc.)

Duplication and time wastage LBAP's in the early days had to devise actions for species/habitats at the local level when a more generic approach for Welsh species and habitats actions would have been less time-consuming.

Lack of co-ordination between partners and engagement in BAP process. Efficacy of the BAP process itself to deliver targets given

constraints mentioned. Also, often staff involved in the LBAP Partnership are not provided sufficient time to be fully engaged in the process leaving the LBAP co-ordinator to take on the majority of the work.

Holes in legislation. There are too many loopholes in current biodiversity legislation. For example, the NERC duty only applies to public bodies and therefore private companies are not bound by this legislation. Also, the EIA (Semi-natural and uncultivated land) only applies to agricultural activities and therefore, we are losing habitats and species to landowners clearing land 'for planning purposes' before planning is approved and conditions can be included.

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

The sustainability agenda has been very dominated by climate. Recycling, energy and waste appear to be the focus of climate change mitigation. Our natural environment makes an important contribution to both climate-change mitigation and adaptation. Biodiversity is also affected by climate change, with negative consequences for human well-being. We need to ensure that we have robust and resilient ecosystems, which provide benefits to society and are capable of adapting to new climatic conditions.

Consequently conserving and sustainably managing biodiversity is critical to addressing climate change and should be fully integrated into the climate change agenda and not separated from this process.

4. What are the implications of emerging international targets for 2020 and beyond?

The implications are that we will need to:

- **Recognise** that biodiversity conservation is a fundamental part of the sustainability agenda, not a secondary issue.
- **Improve** communication to the general public, developers and their agents the idea that that biodiversity conservation is a fundamental part of the sustainability agenda, not a secondary issue.
- **Move towards** ecosystem services and wider habitat protection to create places resilient and able to adapt to climate change. Climate change and habitat management need to be looked at together.
- **Consolidate** effort on ecosystems approach rather than piecemeal site or species.
- **Adopt widely** The Natural Environment Framework for Wales aim to 'embed sustainable development as an objective in all policy and policy delivery, so that people in Wales can continue to benefit from ecosystem services in the face of climate change and other challenges'.
- **Recognise and support** Local government's important role in delivering the ecosystem services we need, through its policies, strategies and on the land it controls.

- **Develop** training in sustainable development and biodiversity for decision makers.

Cllr. Gethin James

*Cabinet Member for Department of Environmental Services & Housing
Cyngor Sir Ceredigion County Council*

September 2010