

# Consultation Response Form

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## **1. Do you agree with the focus of the ambition on addressing the underlying resilience of our ecosystems and identifying and capturing benefits for society? If not, what else do we need to consider?**

No, the proposals you have outlined are not ambitious enough and do not seem to appreciate the fact that the environment has intrinsic value and should be allowed to exist for its own sake as much as for the economic benefit of people. This does not mean that biodiversity does not have economic value, and it does not mean that we shouldn't recognise this value, but it *does* mean we should recognise its intrinsic value as well, and try and protect it even where it is not possible to calculate a clear economic case for doing so.

With this concept in mind, the ambition of the Nature Recovery Plan should be revised. It is not clear what is meant by "reverse the decline in biodiversity", and how this matches with the specific goal "of no net loss". To reverse the decline would be to increase biodiversity, and not simply halt the loss. Accepting the intrinsic value of biodiversity would mean that a clearly stated ambition of increasing the biodiversity in Wales would be more appropriate; perhaps something along the lines of "increase the range and abundance of native habitats and species in Wales" would be better.

## **2. Does the ambition statement capture this new approach fully? What might be added?**

In a sense the ambition statement may be sufficient to "address underlying resilience" depending on what this means. If the aim is simply to freeze Welsh biodiversity in time as it were, then a "no net loss" approach may work. However, it would be much better if the NRP could adopt a much more ambitious "net gain" approach. This would be consistent with the other stated goals of restoring habitats at landscape scale, addressing negative loss factors, improving connectivity and improving management, all of which are sound principles.

## **3. Are our goals the right ones? What might be added?**

No they are not, as suggested by the previous answers. Specifically, the goal of "no net loss" is not commensurate with the ambition of "reversing the decline", assuming that reversing the decline actually means increasing biodiversity. Central to the issue here is the fact that Wales has already lost much of its native biodiversity, both in terms of the number of different habitats and species and in terms of the abundance of those habitats and species. This is a serious problem as it means that the datum by which biodiversity loss, gain and stability is measured is actually much lower than it could and should be. This concept is often referred to as shifting baseline syndrome<sup>1</sup>. Take the wall brown butterfly *Lasiommata megera* for example. This is listed on Section 42 of the Natural Environment and Rural Communities Act (2006) and is a species of conservation concern across the whole UK. Viewing records via the [National Biodiversity Network Gateway](#), it can be shown that the wall brown was recorded very frequently across the whole of Wales until sometime in the 1990s when records of it started to decline. The spread of records between 2000 and 2014 is a fraction of what it was in the

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<sup>1</sup> Originally by Daniel Pauly (1995) in reference to fish stocks. More information can be found in an article by [Frans Vera \(2010\)](#)

period up to 1990. Therefore, any policy that aims purely at achieving no net loss of biodiversity would restrict the wall brown to its current very limited range. This is species, like many others could and should have a very wide range across Wales (as well the rest of the UK). The NRP should have a goal of “net gain”, encouraging species like the wall to grow their range, and encouraging other extinct species, native to Wales, to come back.

To achieve this, an additional goal should be considered that aims to build up the full picture of the wildlife of Wales. This should not be difficult to do, but there is existing evidence that is hard to share because it has not yet been digitised (usually existing as written records on recording cards). The wording for such a goal could be along the lines of “ensure future management decisions are based on the best possible evidence”. The actions needed to achieve this goal would be digitise existing data, support wildlife recording groups and individuals and support organisations aimed at collecting, digitising and sharing wildlife information, particularly Local Environmental Records Centres.

#### **4. Are the actions proposed right and adequate?**

Generally, these actions seem to be appropriate for the goals and general aims of the NRP. It is good to see recognition that the evidence needs to be improved, as this is crucial for ensuring that the best possible decisions are made. It is important to realise that good, evidence based decision making benefits not just wildlife, but sustainable development as well. It was remarked at a recent all party parliamentary group meeting that a lack of available expertise and evidence to local planning authorities actually works against the building and development sector because it reduces certainty and lengthens the time required to make planning decisions.

With this in mind, the NRP should include a robust action surrounding evidence in order to ensure that policy makers, planners, public and private organisations have access to accurate, detailed and trusted biodiversity evidence. This is outlined below.

#### **5. What additional action would you wish to see?**

A robust monitoring strategy for species and habitats. How this is executed is up to the Welsh Assembly Government, but it should utilise the existing network of volunteer recorders, local environmental records centres, recording schemes, societies and wildlife enthusiasts. This is a proven way of ensuring rigor in evidence collection and sharing in a cost effective way.

A monitoring strategy should not stop simply at the collection of records however. Interpretation is just as important. For example, modelling exercises can be used to map the likely distribution now, and in the future, of various species and habitats. There are examples of where this has taken place successfully already, such as north Wales<sup>2</sup>.

#### **6. How do we engage with business more effectively to deliver our ambition?**

There is undoubtedly a willingness within businesses to at least appear greener as this can help market their products. Crucial to ensuring that businesses not only appear green, but also contribute to the delivery of biodiversity related ambitions, is ensuring they are using the best possible evidence to make their decisions. ALERC members can help realise this by providing biodiversity records to people working in the construction sector. However, we estimate that in 2012-13 only 5.6%<sup>3</sup> of planning applications used biodiversity data to help them mitigate impacts on wildlife. It would be very desirable to raise this percentage by engaging with private companies and local planning authorities to make sure they are aware of the data provided by Local Environmental Records Centres and also to enforce the duty to consider biodiversity that local authorities are already bound to. It is essential that any provisions, whether already existing or set by a new NRP are enforced by the relevant organisation (usually NRW).

#### **7. How can we strengthen the way we work together?**

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<sup>2</sup> [Arnell, A.P. & Wilkinson, J.W. \(2013\) Spatial Conservation Status Modelling of the Great Crested Newt in Anglesey and North-East Wales. CCW Contract Science Report 1044.](#)

<sup>3</sup> Based on data from [wales.gov.uk](http://wales.gov.uk) and the Association of Local Environmental Records Centres.

In England, Local Nature Partnerships have been set up along county lines, to assist stakeholders as a group in making the best decisions for nature for a given locality. It is important that something similar exists in Wales to fulfil this function and to replace the now fragmented and largely disregarded Local Biodiversity Action Plan system. LNPs enable the public, private and NGO sectors to come together and work in a coordinated way to benefit biodiversity.

LNPs in England currently, and LBAPs historically have traditionally been organised on a county by county or local authority by local authority basis. In Wales this could be organised on a regional basis. The Local Environmental Records Centres in Wales are already set up to cover four different regions (north Wales, west Wales, south east Wales and Powys) and in order to achieve biodiversity protection and regeneration at a landscape scale, it would be advisable to set up regional forums based on these boundaries.

## **8. How can we share budgets and look at integrated outcomes?**

Good partnership working ensures shared budgets and integrated outcomes. The current model for Local Environmental Records Centres is to work on a partnership basis by garnering support from a range of stakeholders, including local authorities, private companies and NGOs. LERCs in Wales are able to utilise this support, together with volunteer input to provide a value for money biodiversity information service. The volunteer input ensures that for every £1 spent by the LERC, an extra 56p is gained through coordinating volunteers<sup>4</sup>.

This picture can be improved by ensuring that local authorities, key biodiversity actors and stakeholders are encouraged as much as possible to support their LERC. In order to continue to provide, and to improve, the robust and value for money evidence base that currently exists, all biodiversity stakeholders should offer some form of support the LERC in their area. Failure to do this results in patchy evidence, where species and habitat records can only be shared for certain areas. This problem can be particularly acute for habitat data. For example, in 2012-13 north Wales had habitat data available for 100% of the total area, whereas for south east Wales it was only 2%.

## **9. What else should be done to avoid duplication and to deliver our goals?**

This is a key issue, especially when considering how organisations bid for funds in order to complete their projects. There are many small NGOs working to protect and enhance biodiversity in Wales and many of them are bidding to similar funders for similar projects. At worst this can mean that duplication of effort, “reinventing the wheel” and wasting of money. In order to prevent these problems, greater dialogue needs to take place between funders, policy makers and actors. This should include:

- Very clear published goals and objectives, so that everybody is aware of what good projects should try and achieve.
- Meetings between policy makers and funding bodies (from both the governmental and charitable sectors) so that it is clear to funders what the policy objectives are and so that they can make sure the objective of their funds are commensurate with these.
- Meetings between funders and those looking to bid for funds so that bids can be tailored and well written and so that time is not wasted writing and reading in appropriate bids.
- Support to those looking to make to funding bids to ensure they are submitting the best possible bids. For example, this could take the form of advice on which funders to apply to, or which policy areas are currently in most need of action. This kind of support is most critical for the small NGOs, most of whom do not have the overall resources to employ a full time funding officer to research and write bids.

Specific examples that show the need for this support can be made available on request.

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<sup>4</sup> Based on statistics for 2012-13 from the Association of Local Environmental Records Centres.

## **10. How can we best use the Information Hub to collate and disseminate data and evidence?**

Information is key to making and executing good policy. Investment in information is worthwhile as it helps to ensure that money spent on actions is appropriate, efficiently used and not wasted. Therefore, encouraging the use of the information hub would seem wise. However, somewhat ironically, it seems as though details on what is proposed for the information hub are actually hard to come by. For example, there are only a couple of sentences that mention it in this consultation document, and further details on it are hard to find using internet search engines. Therefore, details of the proposed development of the information hub should be published as soon as possible and people should be allowed to comment on them.

There are many factors which will affect the development and use of an effective information hub, such as the way information is presented, who it is pitched at, how copyright issues are dealt with and so on. These are too numerous and complex to detail here. However, Welsh Assembly Government should be aware that all activity incurs a cost, and information gathering and dissemination is no different. The most pressing concern would be how this cost is covered and how the information hub is to be funded. This will have further implications regarding what information can be shared on it and who it can be shared with. Consultation on these issues should be sought from ALERC and the National Biodiversity Network Trust (amongst others).

## **11. How best should we communicate progress with delivery of our ambition, for example, by a three or five year work programme or an annual delivery plan?**

It is not clear why a multi-year programme and annual delivery plan are mutually exclusive. It should be possible to do both. Working to a five year work programme has the benefit of removing uncertainty and setting relatively long term goals, something which is particularly important when considering that reversing biodiversity decline is a long term ambition. Within a five year programme, annual milestones can be included and reported on. The advantage of this is that it allows regular comment and scrutiny of the policy, which hopefully makes it more robust and encourages “buy in” from the widest possible range of stakeholders.

Therefore, the answer to this question is to try and do both; a long term work programme, but with shorter term milestones which can be scrutinised and criticised regularly.

## **12. We have asked a number of specific questions. Please let us know if you think there are related issues which we have not specifically addressed, and provide further information.**

Yes. Overall the document seems to lack “teeth”, that is to say its overall ambition is OK, but not really ambitious enough. It mentions the ecosystem services that biodiversity can offer the people of Wales, but fails to set out an ambitious vision for Wales, where species and habitats are valued simply for their own sake and because they provide enjoyment and inspiration to people, rather than valued only because they reduce flood impacts or sequester carbon emissions (although this is also important).

On top of a greater overall ambition, it is important to know how the people of Wales can track progress on biodiversity targets and hold organisations to account when they are not fulfilling their obligations. For example, the document cites the NERC Act (2006) and mentions the important duty it places on public bodies to have regard for biodiversity. However, no mention is made of how people can assess whether public bodies are conforming to this obligation. In the case of planning and development control, how would anyone know whether a local planning authority was using the best possible biodiversity evidence base, and ensuring the correct surveys are carried out to inform building plans and mitigate environmental harm?

For the NRP to have a full and proper impact it needs to be more ambitious in its targets for biodiversity and very clear about how its effects are measured.