



CONSULTATION ON THE ENVIRONMENT STRATEGY FOR WALES, SEPTEMBER 2005

The Wales Environment Strategy sets out the Welsh Assembly Government's strategic agenda for the environment in Wales. In it, the government commits to valuing and improving the quality of the built and natural environment, enhancing biodiversity and promoting a diverse, competitive, high added value economy that minimises demands on the environment. This consultation asks for our views on whether the right outcomes have been identified; whether current activity will enable those outcomes to be delivered and if not what else needs to be done; and which issues should be a priority.

The consultation documents can be found at:

www.countryside.wales.gov.uk/fe/master.asp?n1=366&n2=529&n3=533

The consultation closed on 3 October 2005.

RESPONSE FROM THE WILDLAND NETWORK 30th September 2005

Chapter 6 Biodiversity

Chapter 4 Managing the Land and Sea

Chapter 3 Climate Change

Summary of response

Chapter 6 Biodiversity

BIO1 Will the actions described enable us to deliver our outcomes for biodiversity?

Yes, if the actions are backed by real financial investment in biodiversity. For example, the cross-compliance conditions associated with the new CAP farm subsidies have the potential to bring benefits to the environment. But the Assembly needs to make sure that the conditions are enforced, and this has a cost. Similarly with the Water Framework Directive. Agri-environment schemes are currently under-policed and under-resourced, making them less effective than their potential.

We agree with the proposed outcomes identified, but another should be added:

* Populations of native species which are locally extinct should be restored, where environmental, social and economic considerations allow. We are referring in particular to species which have a fundamental role in natural ecosystems as well as charismatic species, such as birds (golden eagle, sea eagle) or mammals (wild boar, red deer, roe deer, wild cattle, wild ponies, moose, beaver, lynx). There is an obligation to consider reintroductions of native species in both the Rio and Berne Conventions, and the UK so far stands out as being slow to respond, compared to other European countries and globally. Wales could take a lead in the UK on this issue.

There is in Wales the knowledge and human and geographical resources present which will enable the establishment of large areas for nature conservation, the restoration of habitats, and the reintroduction of lost species. What is lacking at present is both commitment and funding from Government that would put these in place. Experience in other countries, such as Holland, shows that political commitment from Government is key to establishing these programmes.

BIO3 Indicators of success?

Numbers and distribution of different species. Measured by established survey techniques, and development of Wales-wide Biological Records Network.

BIO4 Priority?

This activity is high priority.

Chapter 4 Managing the Land and Sea

LS1 Will the actions described enable us to deliver our outcome for the land and sea?

The specific actions mentioned should contribute positively to the rather general outcome presented.

LS3 How can we better understand the potential impact of different management choices and how can we decide what sort of landscape we want to achieve through management?

The landscape is rightly considered important in the consultation document and, among other functions, it is the visual and aesthetic qualities of the landscape that is central to its value. As stated on page 51 of the consultation document, we need to ensure that the landscape continues to “maintain the unique character, historic and cultural features of Wales”. Moreover, Wales is very fortunate in having areas of wild land, which can be defined as being large areas remote from the artefacts of industrial society. This is a scarce resource in Britain and needs to be valued and protected for its unique qualities that cannot be found in other landscapes.

Large-scale wind turbine developments in rural locations conflict fundamentally with the preservation of the visual qualities of the landscape and deprive us of the character and heritage of the Welsh landscape, and of areas of wild land. Wind developments in rural areas conflict with some of the central tenets of Sustainable Development: “people and communities are at the heart of sustainable development”; “decisions in each field of policy take account of effects and proposals ‘in the round’, not just in the field in question and recognise the potential tensions and risks of action and inaction”; “policies and programmes are designed in an integrated way so that they are mutually reinforcing and evidence based”; “decisions about the short term should not be contradictory to long-term aims”; etc. The unspoilt wild areas of Wales present unique opportunities for recreation, contributing significantly to the economy and quality of life of communities, and are a national asset. This is at present an underused resource, and the sustainable development of rural Wales needs to be based on the preservation and improvement of the landscape, not just in National Parks, but across all undeveloped areas.

There are some glaring inconsistencies in planning policy in its current form. For example, planners can prevent the installation of windows or solar panels in certain buildings. But huge wind developments have been permitted in some of our most beautiful and characteristic landscapes. Meanwhile, it is not possible to build residential properties adjacent to existing dwellings in villages. We suggest that for the present, our traditional approach to planning is applied equally to wind turbines to protect the landscape. In the longer term, a review of planning is to be commended, so that sustainable development is permitted in appropriate locations.

Wind turbines can be located away from wild areas, nearer to the demand for electricity, and still fulfil their function of generating electricity. Wild areas, once developed, cannot be established elsewhere: they are a unique and unmoveable resource.

We need to continue the process started in the forestry industry of improving the quality of the landscape. Examples of good practice that can be applied to agriculture as well as forestry include: removing abrupt changes in vegetation along straight boundaries; and increasing the amount of natural vegetation.

LS4 Do you support our proposed aim for the marine environment?

Yes.

LS5 Indicators of success?

All existing undeveloped areas of landscape protected from development and with natural appearance. Landscapes in wild areas that have already been degraded by inappropriate development and vegetation patterns restored to natural landscapes.

LS6 Priority?

This is a high priority activity.

Chapter 3 Climate Change

CC1 Will the actions described enable us to deliver our outcome in relation to reducing Wales' contribution to climate change?

There is some debate about the relative contribution of carbon dioxide on climate change. What is certain is that the climate is not a stable system, and that historically and before industrial development there have been large and abrupt changes in the climate as well as more steady variation. Biodiversity and human society have survived by adapting to the inevitable changes, by migration and by changes in behaviour.

It should also be emphasised that pollution from energy consumption and other sources should be reduced for many reasons, not just reducing greenhouse gas emissions, such as reducing nitrogen deposition and contamination by heavy metals. Some of these issues are referred to in Chapter 5 of the consultation document. Pollution causes problems with health, wildlife, and quality of life.

We therefore agree with the principle of reducing emissions of pollution, but doubt whether "reducing Wales' contribution to climate change" is either measurable or coherent as an outcome. "Reducing pollution emissions to the air, water and soil" would be a more rational outcome to aim for here, and would be better placed in Chapter 5.

Under the "Climate Change" chapter we need to acknowledge that climate change is inevitable and continuous, and that adaptation needs to be the basis of policy. See below.

Should there be a focus on particular emissions sectors?

As discussed above, greenhouse gases are not the only problems with pollution: these issues should be discussed in Chapter 5 'Sustainable use of resources and ecosystem services'. All sources pollution should be addressed, but the biggest sources should be the priority. Energy generation and transport are obvious priorities. Policy should be directed towards reducing energy consumption.

For transport, developing an effective public transport system is fundamental. Also, much mileage can be saved by increasing the possibility of working from home and setting up more local offices: this is an area where government and local government can take a lead.

For electricity generation, again a policy of decentralisation should be adopted. There is much loss of efficiency and considerable negative impacts on the landscape inherent in the distribution network infrastructure. More security of supply and greater opportunities for renewable technologies can be gained by localising generation supply to the demand for electricity. There is also more potential to use smaller-scale technologies, and avoid the inevitable conflicts with other interests that arise with large-scale developments. This has to be the future of energy supply, and Wales can provide a lead in developing this sustainable approach.

CC3 Indicator of success?

Localised electricity generation and supply. Fewer miles travelled on the roads.

CC4 Priority?

High.

CC5 What needs to be done to achieve 'improved resilience to the impacts of climate change and flexible measure in place to adapt to future changes'?

Under the "Climate Change" chapter, we need to acknowledge that climate change is inevitable and continuous, and that adaptation needs to be the basis of policy.

For the built environment, adaptation means making our infrastructure more robust to withstand extreme weather events, such as wind and flooding. This provides opportunities for creating more natural habitats that can provide climate services to society as well as benefiting biodiversity. Examples are: coastal retreat, creating tidal wetlands where hard coastal defences are proving inadequate; natural undrained ecosystems in river floodplains, to capture and store flood water, protecting settlements downstream; natural, low livestock density, undrained and wooded ecosystems in the uplands, similarly to capture and store rain,

which helps to prevent storm flood surges, low river flows, and drought, and allows better transfer of water into aquifers, and provides water quality improvements.

For forestry and agriculture, adaptation means changing crops and methods to suit the prevailing climatic conditions.

For biodiversity, adaptation usually means migration. Our role in this process must be to provide a landscape where this is possible. Agriculture and forestry therefore need to be more hospitable to wildlife. There are also strong arguments in favour of creating much bigger nature reserves, or wildland areas, where natural systems and biodiversity prevail, to enable larger populations of vulnerable species to thrive, and to provide a buffer from the effects of external factors. There is also a strong case for linking such "core" areas with "corridors" for migration.

CC6 Should certain sectors be a priority for planning climate change adaptation measures?

Land use planning. This refers to not permitting infrastructure development on flood plain land. It also refers to changing the management of land that can provide environmental services, such as coastal zones, river flood plains and upland catchments. There is also the need to create large natural areas, which will provide environmental services and biodiversity benefits, a good example of sustainability where action on one issue reinforces and benefits another issue. The nature conservation sector and the Environment Agency have the human resources in place to put these measures into practice. All that is required is adequate government funding.

CC7 Indicators of success?

Examples of managed coastal retreat, functioning natural river flood plains and natural habitat zones in upper catchments. Results should be less flooding events in built up areas, and more steady flows in rivers, with less cases of flooding, low flows and drought.

CC8 Priority?

High.

Summary of response

Our aims are to promote the recognition and appreciation of wild land. We promote the protection and enhancement of wildland, with respect to its quality and quantity. We believe this can be achieved by improving the way we manage productive landscapes, but we are also promoting the establishment of complete ecosystems on a large scale. In this consultation response, we demonstrate the value of wildland in providing certain services to society and fulfilling many of the aims of the Environment Strategy, by connecting certain issues to particular parts of the consultation document. What is clear is that some straightforward changes to land management in key areas, involving relatively minor government investment, can deliver wide ranging and significant benefits to society. We have also reasoned that the visual qualities of our rural landscapes are sacrosanct, representing a major part of our cultural heritage and a unique, irreplaceable national asset. These landscapes provide the setting for important economic activities that depend on the aesthetic qualities of the landscape, and are increasingly becoming the foundation of the sustainable development of rural Wales.

Stanley Owen
Coordinating Group
Wildland Network, 30th September 2005