

HRLN 17 - Welsh Local Government Association (WLGA)

Senedd Cymru | Welsh Parliament

Pwyllgor Newid Hinsawdd, yr Amgylchedd a Seilwaith | Climate Change, Environment, and Infrastructure Committee

Atal a gwrthdroi colli natur erbyn 2030 | Halting and reversing the loss of nature by 2030

1. Your views on the effectiveness of current policies / funds / statutory duties in halting and reversing the loss of nature by 2030.

(We would be grateful if you could keep your answer to around 500 words).

1 While current policies and statutory duties form a solid foundation for nature recovery, several challenges and gaps remain in addressing the scale of the biodiversity crisis. Policies could be strengthened and more integrated, for example several policy areas are taking forward Programme for Government (PfG) commitments, but this is done in silos which can make it difficult at a local level to integrate activities.

2 Approaches to tackling Climate Change and Biodiversity need to be better integrated into everything we do, and we need to ensure that nature recovery is built into proposals at an early stage. We are working with Ambition North Wales to develop guidance on business case development which will integrate decarbonisation and biodiversity opportunities at the early stage of projects. We hope this can alleviate some of the issues in this area.

3 Although the current framework seems adequate, the evidence for the effectiveness of nature interventions can only arise from long-term monitoring, for example the State of Natural Resources Report (SoNaRR) published by Natural Resources Wales. There is also a real challenge in terms of quantifying this effectiveness, causing issues in terms of reporting but also in evidencing the financial justification for interventions.

4 Implementation is constrained by resources for delivery and continued loss of expertise within local government. Whilst we support the case for ambitious approaches to be taken to tackle the nature emergency, , the introduction of new duties on councils must be matched by a medium to long-term funding programme.

5 We accept that reporting and targets are key to measuring the success of interventions and policies. However, we would not support new targets or reporting being 'forced' on councils due to the difficulty in accurately quantifying these activities. There is currently a real challenge for local government to prioritise this area of work in the face of other pressures. Councils fully endorse the principle of halting biodiversity loss, which is highlighted by most councils declaring a nature emergency. However, the current financial climate makes it challenging to deliver all the activities councils would like to undertake when these are competing for resources against key services or infrastructure projects (whilst recognising that informed decisions on the approaches taken in delivering those services and infrastructure projects can themselves contribute to our biodiversity goals). Targets could potentially penalise councils for not doing enough when the reality is they are faced with multiple, simultaneous, and sometimes conflicting challenges.

6 Local authorities play key roles in transitioning to zero carbon, scrutinising development, managing significant woodland estates, facilitating Invasive NonNative Species (INNS) programmes, and advancing nature recovery programmes through a range of policies and activities. These activities however do not lend themselves to short term funding programmes but require active long-term commitments. As such, we feel that the level of funding is insufficient to enable the scale of delivery needed to halt and reverse the loss of nature and long-term commitments are needed to ensure management and maintenance of interventions beyond creation and initial installation. More could be done, working with WG, to ensure integration of nature recovery best practice across all strategic areas along with climate change, both nationally and locally.

7 A more specific comment is around the need for tighter control within planning policy as this can be weak and easily circumvented by an industry which may not embrace the national direction if it will have an impact on profits.

Further, the forthcoming Sustainable Farming Scheme in 2026 could have an effective role to play in wider nature recovery. However, programmes such as tree planting require more robust evidence as to where effective opportunities exist and support for management of current woodlands.

2. Your views on the progress towards implementing the Biodiversity Deep Dive recommendations.

(We would be grateful if you could keep your answer to around 500 words).

8 We are still waiting for detail from Welsh Government on the implications of the Biodiversity Deep Dive recommendations and are therefore not able to provide in-depth feedback.

However, it is important to note that funding opportunities and collaboration through Local Nature Partnerships has been positive, enabling strong progress in a range of areas. Furthermore, there may be an opportunity to strengthen planning policy in PPW 12 to ensure a holistic approach relating to Nature Recovery (step wise approach to deliver net benefit for biodiversity). Green infrastructure and Trees have been a positive outcome.

As with some other WG reviews, for example the post-implementation review of the sustainable drainage legislation, progress with the delivery of some of the recommendations has been slow. There is therefore a need to generate national ownership of these reviews/recommendations (with the opportunity for input from local government and other partners where appropriate) without adding more burden on councils and for WG to resource delivery of these reviews/recommendations adequately.

9 Considering Recommendation 5, capacity building, behaviour change, awareness raising, and skills development, there is clearly another big gap here which is endemic across many sectors in Wales. We would like to see more progress and integration with WG's Skills Action Plan which supports its net zero plan.

3. Your views on current arrangements for monitoring biodiversity.

(We would be grateful if you could keep your answer to around 500 words).

10 There is real difficulty in monitoring biodiversity as it may take several years for results to be seen. Furthermore, biodiversity is often monitored in a fragmented manner by different stakeholders making it difficult to understand large scale implications of activities or indeed drive larger scale initiatives. There are potential opportunities to better use existing avenues to monitor biodiversity, for example through the SAB or planning process but careful considerations around skills and capacity would need to be given.

11 It is worth noting that we are already seeing a lack of capacity to monitor biodiversity indicators such as UK National Biodiversity Indicators. Although proxy indicators can be useful, such as the area of land designated as Sites of Importance for Nature Conservation (SINCs), the implementation of biodiversity policies in the Local Development Plan (LDP), and the numbers of volunteers

engaged in nature conservation activities, they have limitations and do not support the long-term monitoring of individual species and habitats. It would require additional resources for local authorities to be able to deliver effectively.

12. We note the proposed biodiversity targets in the White Paper on Environmental principles, governance and biodiversity targets and agree this could help formalise monitoring of biodiversity alongside section 6 reports. However, these targets would need to be developed in partnership with local government to ensure they are deliverable and duly consider resource implications.

4. Your views on new approaches needed to halt and reverse the loss of nature by 2030.

(We would be grateful if you could keep your answer to around 500 words).

12 Agricultural land constitutes 88% of Wales' land area and a new approach to the impact of agriculture upon climate change, biodiversity, habitat management and water quality is **needed through Welsh Government's 'Sustainable Farming Scheme'**, which has been postponed until 2026. Whilst we are acutely aware of potential financial impacts from the SFS on landowners, land owned by the public and third sector is insufficient to reverse the loss of nature and can only offer limited benefits due to its spatial fragmentation.

We believe further work is needed in light of the Welsh Government's '*Securing a Sustainable Future*' White Paper: Environmental Principles, Governance and Biodiversity targets for a Greener Wales' before we can be confident, we have the right framework to halt and reverse the loss of nature by 2030.

13 In the same vein as previous responses, there needs to be a long-term commitment with funding (10 years+), biodiversity needs to have a financial value (ecosystem services), and nature-based solutions need to be intrinsically considered.

5. Do you have any other points you wish to raise within the scope of this inquiry?

(We would be grateful if you could keep your answer to around 500 words).

14 Audit Wales is undertaking a national study on the Biodiversity and Resilience of Ecosystems Duty under Section 6 of the Environment (Wales) Act 2016. We are

waiting for this to be published (expected autumn 2024) and have submitted similar evidence to inform their report.

WLGA CONSULTATION RESPONSE on '*Halting and reversing the loss of nature by 2030*', Climate Change, Environment and Infrastructure Committee, Welsh Parliament

22nd August 2024

INTRODUCTION

1. The Welsh Local Government Association (WLGA) represents the 22 local authorities in Wales, and the three national park authorities and three fire and rescue authorities are associate members.
2. The WLGA is a politically led cross-party organisation, with the leaders from all local authorities determining policy through the Executive Board and the wider WLGA Council. The WLGA also appoints senior members as Spokespersons and Deputy Spokespersons to provide a national lead on policy matters on behalf of local government.
3. The WLGA works closely with and is often advised by professional advisors and professional associations from local government, however, the WLGA is the representative body for local government and provides the collective, political voice of local government in Wales.

FOR FURTHER INFORMATION PLEASE CONTACT

Jean-Francois Dulong, Climate Change Mitigation and Adaptation Policy Officer

Welsh Local Government Association
One Canal Parade
Dumballs Road
Cardiff
CF10 5BF
Tel: 029 2046 8600