

Ms Ruth Jenkins  
Head of Natural Resource Management Policy  
Natural Resources Wales

21 June 2023

**Subject: Chartered Institute of Ecology and Environmental Management (CIEEM) – views on Natural Resources Wales’ Area Statements**

Dear Ms Jenkins,

We refer you to our letter of 29 April 2021 in which we welcomed the publication of the Area Statements in 2020. We particularly welcome the focus on reversing the decline of, and enhancing, biodiversity; building resilient ecosystems; and the use of nature-based solutions across the majority of the statements.

We are also pleased to see the clarification in Future Wales 2040 that Area Statement priority areas are a material planning consideration.

Our earlier letter set out our thoughts and queries regarding the Statements, but we feel an update is necessary following subsequent developments, namely:

- feedback received from CIEEM members and via our membership of Wales Environment Link (WEL);
- discussions with NRW’s Area Statements team;
- liaison with Welsh Government (WG) Planners, leading to the joint CIEEM/WG publication of the [Net Benefits for Biodiversity Briefing Paper](#) in October 2022;
- changes in legislation which affect the conditions in which Area Statements operate.

Based on our current understanding of Area Statements (AS) we would therefore like to offer the following comments and recommendations.

**1. Overarching comments**

The general response we have received is that the AS form a commendable enterprise which is failing in practice. The AS present an unprecedented opportunity for joined-up policy thinking which will achieve real benefits in tackling climate change and biodiversity loss, but there are several elements which are currently preventing them from achieving these aims.

**2. Priorities – national, regional and local planning**

The stated intent of the AS is to outline key challenges facing the areas, to adopt a joined-up approach to finding solutions to those challenges, and to better manage natural resources for the benefit of future generations. They are a collaborative response to Welsh Government’s 2017 ‘Natural Resources Policy’.

We are pleased to see NRW is committed to looking at AS in a wider Wales context via the Strategic Environmental Assessment and Health Impact Assessment. However, it is not always clear what NRW’s priorities are, and how the differing priorities in each AS reflect National Resource Policy

priorities. Which priority should a Local Authority address when they have a particular problem – local or national? These may be in conflict with each other. For example:

- High level themes like Climate Ready Gwent or Linking Our Landscapes are not easily accommodated into the planning process at the level of individual planning applications.
- It appears that local nature zones are being developed alongside AS, not with them.
- AS are intended to influence Local Development Plans, but there is little opportunity to do so as the Plans are only replaced every 10 years.

The AS are perceived to lack a consistent approach, with too great a spread of priorities and not enough focus. The Statements fail to join up at the Area boundaries, making implementation difficult for any features (e.g. rivers or forests) or proposals which span two Areas.

There is also confusion over some of the terminology, which is not consistent throughout the AS and Welsh Government policies.

*We recommend:*

- An additional, all-Wales Area Statement. General issues facing the whole of Wales should be addressed from a consistent baseline, with a hierarchy of priorities feeding down to local issues. This will help local ecologists to look at how their locality contributes to, or is affected by, the wider picture across Wales.
- Ensuring the terminology is consistent with Government policies and legislation.

### **3. Implementation and Advice**

NRW's AS team have indicated that they would like more guidance and a clear methodology from Welsh Government on the process of achieving Net Benefits for Biodiversity. As mentioned above, CIEEM and Welsh Government published a Briefing Paper on Net Benefits for Biodiversity in 2022, and will shortly be publishing an accompanying Biodiversity Enhancements Best Practice Guidance Note. There is scope here for more joint working, and CIEEM has begun to discuss this with Welsh Government planning team.

Good quality advice is critical and, as a professional body, CIEEM's main interest is that any advice given should come from qualified practitioners. WEL has challenged WG on the dependence on Farming Connect; WG response is that they are going to diversify the contracting of environmental specialists to deliver that advisory service. Farming Connect will thus have a huge role in the SFS, so they need to understand AS and how to apply them.

The Farming Connect Framework Procurement process, initiated February 2023 (Knowledge Transfer Programme 2023-2025), incorporated Topic Areas for specialist professionals within the biodiversity/environmental sectors. CIEEM was pleased to be contacted by Farming Connect with an invitation for CIEEM members to apply to become contractors on this framework. However, despite CIEEM's promotion to its membership during the tender period, the Sell to Wales ITT [headline descriptor](#) for "Expertise, Software Development, Analysis, Marketing/Communication, Events and Admin Support" may have generated only modest interest from key professional environmental sectors. In the meantime, we remain concerned that Farming Connect and Menter a Busnes might continue to hold limited capability in these important specialist areas through the forthcoming framework period.

*We recommend:*

- Joint working with Welsh Government to produce best practice guidance for implementing Net Benefits for Biodiversity via AS.
- Increasing liaison between CIEEM members and Farming Connect to ensure farmers receive expert advice.

#### **4. Monitoring and Feedback**

The AS webpages welcome opportunities for engagement; however, this would appear to be on an ad hoc basis. Despite local engagement being one of the aims of the AS, there appears to be a lack of communication in some quarters, with some landowners unaware of the existence of the AS.

Without adequate monitoring it will be difficult to assess how successful the AS are at achieving their goals.

*We recommend:*

- Clarifying what funding streams will be available for maintaining, monitoring and creating sites, and implementing AS.
- Introducing a mechanism/process whereby organisations can provide feedback at a Wales-wide level, since doing this in an area-based way is likely to be challenging for many.

#### **5. Sustainable Farming Scheme**

The Sustainable Farm Scheme (SFS) is an opportunity for collaborative working but it is not clear how this will be achieved. The SFS list of optional actions specifically mentions using AS as a guide to what actions would be most appropriate for a farm. It is vital, therefore, that the AS are recognised to be reliable and useful, in order not to discredit the SFS as a whole. Any advisory bodies involved in the SFS will need to understand the AS and how these can be used as a basis for advice on the measures that are appropriate for a particular farm. Ecologists should feel confident in using their local knowledge, and should use the AS to legitimise and endorse their recommendations/plans when persuading farmers of the most appropriate actions.

*We recommend:*

- Training for advisory bodies on the role of AS. This should be both generic (the purpose of AS as a whole) and specific (on the particular focus of each AS).
- Using a facilitator to deliver multi-landowner collaboration. There are many examples of this as a successful way of working, but it must be appropriately supported and resourced.

#### **6. Funding**

Ultimately the difficulties expressed above come down to insufficient funding and resources. In our response to Welsh Government's [Sustainable Farming Feedback Survey](#) (November 2022) we urged the Government to address the issue of resources in order that the work already put into the AS is not wasted.

Whilst we appreciate that lack of funding is a problem for many in the current economic climate, unless the AS are properly resourced they will fail to build confidence that they are fit for purpose.

They are statements of intent but contain no clear mechanism for how to resource delivery of their objectives.

Gloucester University has recently published a report [Co-designing long-term agreements for Landscape Recovery \(ELM\)](#) on barriers to the collaborative landscape restoration element of ELMS in England. It contains recommendations on incentivising long-term collaborative projects, which might be usefully be applied to create some impetus in delivering AS aspirations, e.g. governance for private finance, developing 'stacked' finance mechanisms (rather than 'blended'), and frameworks for multi-party agreements.

We would welcome an opportunity to meet with you to discuss these topics and explore them further. Please do get in touch with [JasonReeves@cieem.net](mailto:JasonReeves@cieem.net) who will be able to determine a good time to meet.

Yours sincerely,



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The Chartered Institute of Ecology and Environmental Management (CIEEM) is the leading professional membership body representing and supporting ecologists and environmental managers in the UK, Ireland and abroad. Our Vision is of a healthy natural environment for the benefit of current and future generations.

CIEEM has a diverse membership covering professionals in consultancy, local and central government, government agencies, academia, NGOs, and industries such as utilities and transport. The diversity of our membership gives us valuable scope to advise and comment on a broad range of issues relevant to the ecology and environmental management sector.

In Wales, we have a Policy Working Group (made up of volunteers from our membership) which meets regularly, under the chairmanship of Mike Willis, alongside our Vice President for Wales, Penny Lewns, and members of our Secretariat, including our Project Officer for Wales, Mandy Marsh, and Policy Officers.