

February 2017



INTRODUCTION

1. The Welsh Local Government Association (WLGA) represents the 22 local authorities in Wales, and the three national park authorities and the three fire and rescue authorities are associate members.
2. It seeks to provide representation to local authorities within an emerging policy framework that satisfies the key priorities of our members and delivers a broad range of services that add value to Welsh local government and the communities they serve.
3. The WLGA welcomes the opportunity to contribute to the consultation to inform the development of the Natural Resources Policy.
4. The three priority themes identified for the Natural Resources Policy align well with the Well-being of Future Generations (WFG) Act's requirements. Taken together, they get the point across that natural resources should not be considered in isolation but as part of a whole, interconnected system. The type of growth we support and nurture today is vitally important for future generations.
5. The focus in the consultation document on green growth and nature-based solutions to some of the major issues faced by society, the economy and the environment is welcome. It gives a clear signal that steps we take to look after our natural resources can actually help us create more resilient communities: they should not be viewed as 'optional extras'.
6. The link made with individual and community well-being forms part of this whole system. Future well-being will depend on the resilience we build into our communities. Placing natural resources at the heart of this resilience is wholly appropriate.

7. A strong environment - and its associated ecosystems services - ultimately underpins both the economy and society and, therefore, general well-being. Conversely, a deteriorating environment will have serious negative economic and social consequences, which could include poor health, increasingly unequal access to resources, safety risks (e.g. flood risk) and shortages of many of life's essentials - food, water, clean air, energy.
8. The WLGA therefore supports the three themes that are identified.

Key steps to deliver on these themes

9. There is an inextricable link to the Well-being of Future Generations (WFG) Act in the contribution that natural resources have to the social, economic , environmental and cultural well-being of Wales.
10. There needs to be continued support (financial, technical and legal) for the delivery of NNRP for example in the development and delivery of renewable energy.
11. The support must also ensure that advice to business has sustainable development at its heart, supporting green forms of growth across all sectors and giving a clear signal about the types of activity that we want to see thrive and develop in Wales.
12. It is essential to investigate opportunities which will present themselves in any new 'post-Brexit' Regional Policy to include payment for ecosystem services, especially as a means of support for rural areas and communities.
13. In addition to the development and use of renewable energy, there need to be 'hierarchies' established in terms of our use of energy, waste services and transport such that the ideal, first, is elimination(as far as possible) of unnecessary use of resources, followed by usage that is efficient as possible (to minimise resource use) with sustainable forms of use encouraged(e.g. reuse and recycling

as part of a 'circular economy'; renewable energy; public/low carbon transport and active travel) – all favoured over historic conventional patterns of resource use.

14. There should be support for innovation in the public sector, recognising that this does run the risk of failure. However, any such failure should be viewed as positive provided that bodies have applied the principles of the WFG Act and 'fail forwards', learning from the experience and adapting behaviour accordingly.
15. Acknowledge that internationally there is growing recognition that nature-based solutions can form part of a viable, cost effective and efficient solution to challenges such as climate change, flood risk management and water pollution, as well as support in tackling some of our key public health issues, diabetes, obesity, air and noise pollution and how, by utilising nature-based solutions, we can contribute towards the 7 goals.
16. Advice and support is essential to help organisations understand how nature-based solutions might offer them a way forward- often in line with the 'prevent principle of the WFG Act (e.g. prevention of flooding; prevention of diabetes, mental health issues) and in some cases, an economic development opportunity (e.g. tourism opportunities, timber-based businesses)
17. It must be acknowledged that the benefits to biodiversity and ecosystem resilience can be primary benefits, secondary or even tertiary benefits – the importance is that the benefits are realised.
18. There is benefit in SoNaR, NNRP and the Area Statement being out of synch with the Well-being Assessment, Objective setting and Well-being Plans. The overlap will ensure that these documents are kept alive and relevant and regularly reviewed as part of the Annual Report on progress on WB objectives and WB Plans
19. The NNRP must be an integral part of the determination and delivery of Carbon Budgets – but not just a tick box approach but one of consistent, continued and integrated delivery.

- .
20. There need to be connections and recognition of those connections between terrestrial and marine and the impact that the economy can have on both e.g. pollution of marine environment with the by-products of the economy.
 21. Reference is made in SoNaR for multiple benefits to be realised. Multiple benefits don't just happen, they need to be clearly identified at the start, not just let's see what multiple benefits (whatever they are) will come out of this. If you do not plan for multiple benefits will they happen? (reference back to point 4) In some instances the primary reason and benefit will be environmental but with secondary benefits to health. In other instances, the primary benefit may be economic but through the action taken the environment benefits accrue as secondary (e.g. habitat restoration).

Barriers to taking this approach forward

22. The Area Statements are informed by the NNRP. There should be not expectation that the 'boundaries' of the Area Statements being produced between 2017 and 2019 will be the same in the next phase. It must be clear that the SoNaR informs the NRP and the NRP informs the Area Statement and thereby what and where action needs to be undertaken – so the area boundaries could be different to address the identified issues.
23. There is a scepticism about nature-based solutions and the ability to develop payment for ecosystem services, which needs to be overcome.
24. The public (and political) reluctance/resistance/opposition in relation to policies that might encourage more sustainable levels of consumption, encourage higher levels of re-use and recycling, use of public transport, active travel or electric vehicles, and to the development of some forms of renewable energy (e.g. wind farms)

- 25. Failure or unwillingness to recognise the role natural resources can play in securing long term economic development, instead preferring short term 'quick wins'
 - 26. Difficulties of trying to develop a circular economy in Wales given the international operation of commodity markets.
 - 27. Audit regimes that currently engender a risk-averse mentality which will not encourage the types of new approaches needed to address deep-seated and complex issues.
 - 28. Resistance from professions to changes that may undermine current systems/funding on which their professions are based (e.g. medical treatment as opposed to nature-based solutions)
-

For further information, please contact:

Neville Rookes and Tim Peppin

neville.rookes@wlga.gov.uk and tim.peppin@wlga.gov.uk

Welsh Local Government Association
Local Government House
Drake Walk
Cardiff
CF10 4LG

Tel: 029 2046 8625