

Agenda – Climate Change, Environment, and Infrastructure Committee

Meeting Venue:

Hybrid – Committee room 4 Ty Hywel
and Video Conference via Zoom

Meeting date: 30 June 2022

Meeting time: 09.30

For further information contact:

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Committee Clerk

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Private pre-meeting (09.15–09.30)

Public meeting

1 Introductions, apologies, substitutions, and declarations of interest

(09.30)

2 Green recovery in Wales

(09.30–10.45)

(Pages 1 – 83)

Sir David Henshaw, Chair – Green Recovery Task and Finish Group

Attached Documents:

Research brief

Paper – Green Recovery Group

Report by The Funding Centre – The Green Recovery Group – Report Updates

(Private paper)

Break (10.45–11.00)

3 Interim environmental governance arrangements

(11.00–12.00)

(Pages 84 – 94)



Dr Nerys Llewelyn-Jones – Interim Environmental Protection Assessor for Wales

Attached Documents:

Interim Environmental Protection Assessor for Wales: Annual Report 2021–22

Lunch break (12.00–12.30)

Private pre-meeting (12.30–12.35)

4 Green recovery and Interim environmental governance arrangements

(12.35–14.05)

(Pages 95 – 101)

Gareth Cunningham, Head of Conservation Wales – Marine Conservation Society

Professor Steve Ormerod, Professor of Ecology and Co-Director Water Research Institute – School of Biosciences, Cardiff University

Annie Smith, Head of Nature Policy and Casework – RSPB Cymru

Attached Documents:

Paper – Professor Steve Ormerod

Paper – RSPB Cymru

5 Papers to note

(14.05)

5.1 Green recovery and Interim environmental governance arrangements

(Pages 102 – 105)

Attached Documents:

Paper from the Woodland Trust in relation to Green recovery and Interim environmental governance arrangements

5.2 Bus and rail transport in Wales

(Pages 106 – 108)

Attached Documents:

Paper from West Coast Partnership in relation to the Committee's inquiry into bus and rail transport in Wales

5.3 Cross Party Group on Medical Research

(Pages 109 – 112)

Attached Documents:

Letter from the Minister for Economy to the Chair, Cross Party Group on Medical Research in relation to questions raised following the 27 April meeting of the Cross Party Group

5.4 Interministerial Group for Housing, Communities & Local Government

(Pages 113 – 114)

Attached Documents:

Letter from the Minister for Finance and Local Government to the Chair in relation to the inaugural meeting of the Interministerial Group for Housing, Communities & Local Government, held on 24 May

5.5 Environmental governance

(Pages 115 – 117)

Attached Documents:

Open letter from environmental organisations to the First Minister in relation to access to environmental justice

5.6 Transport – urban speed limit

(Pages 118 – 119)

Attached Documents:

Letter from the Minister for Climate Change to the Chair in relation to a 20mph default urban speed limit

6 Motion under Standing Order 17.42 (vi) and (ix) to resolve to exclude the public from the remainder of today's meeting

(14.05)

Private meeting (14.05–14.30)

7 Green recovery in Wales – consideration of evidence heard under item 2

8 Interim environmental governance arrangements – consideration of evidence heard under item 3

9 Consideration of approach to the Legislative Consent Memorandum for the UK Infrastructure Bank Bill

(Pages 120 – 127)

Attached Documents:

Consideration of approach to the LCM for the UK Infrastructure Bank Bill

10 Consideration of the Committee's draft report on digital connectivity in Wales

(To Follow)

Attached Documents:

Draft report on digital connectivity in Wales

Document is Restricted

Climate Change, Environment, and Infrastructure (CCEI) Committee, June 2022

Green Recovery Group Update

1. This paper provides an update on the work of the Green Recovery Group and progress made on addressing the priorities and recommendations in:
 - Green Recovery: [Priorities for Action Report](#). Including an update on the National Nature Service.
 - [Green Recovery: Supporting the environmental sector in Wales](#)

The paper sets out the lessons learnt and the proposed next steps for the work of the Group.

Background

2. In May 2020, Lesley Griffiths, the Minister for Environment, Energy and Rural Affairs asked Sir David Henshaw to convene a Green Recovery Task and Finish Group to identify priorities for action for a green recovery from the covid pandemic with social justice as a guiding principle, as well as develop a shared plan to stabilise the environment third sector.
3. The work reported to the Minister's stakeholder roundtable, which included senior representatives from the food, farming and fisheries sectors alongside environment third sector organisations, local authorities and NRW. Recognising that the membership at the roundtable included all the sector representatives, there was a conscious decision to bring together different perspectives to help shape the opportunity. A broad range of senior leaders from the public, private and third sector agreed to be involved (see Appendix 1). The group was set up to convene collective action, and test ways of working in an agile manner. It was recognised that it was not a representative group, but one that used their connections to build stronger networks and links to get things done.
4. The group worked together through the summer and early autumn of 2020, setting out a call for 'good ideas' which resulted in 168 proposals being submitted. This culminated in the publication of the two reports in early November 2020. These reports led to the identification and allocation of over £6m of financial support by Welsh Government to support priority areas as well as a specific grant programme to stabilise the environment sector. To build on the momentum, members of the group agreed to create a Delivery Partnership with staff resources committed to support the next phase of work.
5. One of the high profile "good idea" proposals was the creation of a National Nature Service (NNS). Staff from the Delivery Partnership supported the development of this idea, facilitating a number of engagement events and communications involving nearly 200 people. A concept note has been endorsed by Welsh Government and £166,598 released to support the development of a detailed business case. The ambition for the NNS is truly aligned with the Groups definition of a Green and Just Recovery, mobilising people across Wales in support of nature recovery, acting as a platform that links people of all ages with opportunities for nature-based training, apprenticeships, employment, enterprise and volunteering.
6. The group has also created links to the work of Wales Marine Action and Advisory Group (WMAAG) on Blue Recovery. The Group has been endorsed by the Minister for Climate Change to continue development of the approach across three key enablers: Ocean Literacy, Sustainable Investment and Building Capacity.

Review of progress made against the Reports

7. In the Spring of 2022, NRW procured the Funding Centre to review progress made against the Priorities for Action Report and the Green Recovery: Supporting the environmental sector in Wales Report. As well as a desk based rapid review of the evidence, the Funding Centre has interviewed a wide range of stakeholders to identify successes and any new barriers or challenges faced by organisations in getting stuff done.
8. The new Report includes (See Annex 1 for the Full Funding Centre Report – Working Draft):
 - A review of new trends and initiatives, identifying any significant changes (since Autumn 2020) to the delivery landscape.
 - Review of progress made on projects within the Priorities for Action Report and challenges they have encountered in moving things forward.
 - Review of the current “state” of the environment sector in Wales and any new issues that have emerged since the publication of the Green Recovery: Supporting the environmental sector in Wales report.
 - Conclusions and recommendations.
9. The Funding Centre conclude, there remains a shared ambition for a green and just recovery, and strong support for the principle of developing activity around a series of Priorities for Action. Nevertheless, stakeholders are concerned that the opportunity to act may be slipping away as the cost of living crisis and the war in Ukraine rise to prominence, and as such want to see a greater sense of urgency brought to the Green Recovery Group. The Funding Centre research confirms that the eNGOs still require support to safeguard their resilience. Investing in the sector and creating a new dynamic with funders and policy makers, were highlighted as being factors that could unlock the potential of the sector to take an active lead in delivering against the ambitions set for a green and just recovery.

Green Recovery: [Priorities for Action Report](#)

10. The Green Recovery: Priorities for Action Report summarised a range of prioritised practical actions that could be taken forward in the short and medium term as part of Wales’ recovery from the pandemic. Following an open ‘call for ideas’, 168 varied proposals were received from community groups, social enterprises, charities, public bodies, private companies, environmental groups and individuals across Wales. The organisations included some with a clear environment focus, as well as many others with a focus on jobs and skills creation, climate change mitigation and adaptation. ‘Ideas’ showed a range of actions that were highly diverse in scale, location, ambition and readiness.
11. The proposals were analysed and selected into “priority one” and “priority two” projects across three broad strands of activity that would be required to address the climate and nature emergencies and social justice.

Priority Action	Priority One Projects	Priority Two Projects
Nature Based Solutions Actions that focus on a range of ecosystems on land and sea.	7	8
Transforming our socio-economic systems Creating a circular economy that supports nature, creates opportunities for jobs and skills development.	33	35
Enablers of the Green Recovery Skills, apprenticeships and procurement	9	5
Totals	49	48

12. In addition to creating the Priorities for Action list, the report also highlighted the potential for the group to use its convening power to facilitate and encourage high-level actions that would “stimulate discussion and drive action”.
13. As part of the Groups commitment to supporting the Priorities for Action, the Green Recovery Delivery Partnership was established. With individuals from organisations represented on the Green Recovery Group, they committed time and resources to hold 1-to-1 sessions to explore state of readiness of proposals and support requirements; hosted events to facilitate opportunities for co-production; and developed the ambition and business cases for proposals. It is important to recognise the Teams work and effort to stimulate, facilitate and support progress and ‘move the dial’, getting proposals ready to move to the next stage of delivery.
14. The Funding Centre have not sought to create a detailed analysis of every submission. Given the diverse scale and nature of each proposal, as well as the varied nature of the proposing organisations, this would not have been practical within timescales. However, it was stated that it would be useful to create some way of monitoring progress on individual projects in future to allow effective co-ordination and communication of activity.
15. The report indicates that a significant number of projects have progressed to some degree. Some major strategic schemes, such as the National Nature Service, have been actively developed while a larger number of other schemes have sought to trial or pilot their Priority for Action idea, accessing smaller scale funding, or resourcing activity from within existing budgets. Given the absence of a clear funding stream for the Priorities for Action Proposals, to see this level of progress is to be applauded and reflects the level of commitment and ingenuity of individuals and organisations to act on this agenda.
16. Other Priorities for Action proposals have not progressed. Whilst all organisations have continued to develop their thinking around those proposals and believe that the case for change remains strong, they referenced some significant barriers that have prevented substantive progress. A lack of finance and capacity were predictably high on that list of barriers however, responses also highlighted a lack of leadership and clarity as being equally problematic.
17. Some highlights of progress made against the Priorities for Action report include:
18. ***Supporting the allocation of £5.3m of support from Welsh Government.***

Due to end of year financial pressures, it was prudently chosen to use established mechanisms to facilitate spend, with allocation made through: the Wales Local Government Association (WLGA) to Local Authorities; the National Parks; and a selection of smaller projects. It was recognised that this was not ideal, but tactical to ensure we supported green recovery work on the ground in a timely manner. The WLGA and Local Authorities believe that the use of the Green Recovery funding to deliver priority themes was extremely successful.
19. ***The proposal for a National Nature Service (NNS).***
 - a) As a Priority One project the Delivery Partnership helped initiate development for a National Nature Service (NNS) in early 2021.
 - b) The proposal has been developed collaboratively and has drawn upon the extensive bank of evidence and ideas that stakeholders have generated and continue to generate. A wide range of individuals, organisations and networks across all sectors have engaged with the process, including: 3rd sector organisations involved in delivering a range of environmental, social, economic and cultural programmes; several local authorities and Local Nature Partnerships; various departments in Welsh Government; Natural Resources Wales; National Parks and AONBs; education and training providers including colleges and Lantra; youth organisations; business organisations; farming and forestry organisations.

- c) Co-ordinating work has been carried out by Food Farming and Countryside Commission and Future Generations Commissioners Office with input from Peter Davies (Chair of the Welsh Council Voluntary Action; Chair of the Wales Marine Action & Advisory Group (WMAAG)).
- d) The NNS will provide pathways for people to enter and work in green jobs, to ensure the skills and training pipelines are in place to meet the likely supply of jobs related to the climate and nature emergencies. In doing this, the aim is also to contribute to kickstarting the shift from an 'environmental sector' to an economy that's green at its core; and deliver broader benefits to individuals and community well-being. The NNS will act as a platform to help address the skills shortage in relation to green skills, linking people of all ages with opportunities for nature-based training, apprenticeships, employment, enterprise and volunteering.
- e) To demonstrate the NNS in practice, the Team have been working in partnership with the Valleys Regional Park (VRP) as an early adopter, setting out a range of activities where ambitions for a NNS across the region could be realised, outlining potential scenarios.
- f) A [Ministerial decision of support for a National Nature Service](#) pilot was made on 11th May, with £166,598 of revenue support towards the pilot of the National Nature Service in Wales. This will provide the capacity to further develop the proposal with a requirement to produce a full business plan for a Valleys Regional Park demonstration area within the first 6 months. The project team will seek to extend this to include a North Wales demonstration area.
- g) The Project Team aim to be in a position where the demonstration areas are ready to initiate in full at the start of next financial year, with a plan to move to an all Wales NNS within a timetable to be agreed.
- h) Wales Council for Voluntary Action (WCVA) and the Food, Farming and Countryside Commission (FFCC) will continue to lead action on the NNS with support from other providers, including RSPB. There are a series of planning meetings scheduled in June with stakeholders. An initial web site has been established <https://www.gwasanaethnaturcenedlaethol.cymru/>

20. Development of the Anglesey Green Spine project.

- a) The Glasffordd Môn is a vision to develop a continuous high quality green corridor for active travel (walking and cycling), wildlife and landscape across Ynys Môn from Newborough in the south to Amlwch in the north. The project is led by Menter Môn and supported by a Steering Group formed of key stakeholders.
- b) The experience of this project highlighted the complex nature of the funding landscape and exposed challenges imposed by funding process in getting good ideas off the ground. In March 2021, the project welcomed a £145k grant through Welsh Government for the initial phase, however this was bound by end of year process with no time for capital spend and required further discussions to agree a way forward that met the financial framework for grant expenditure but also permitted the best value outcome to be made from the grant. This highlighted the need for flexibility.
- c) The delivery of the vision for Glasffordd Môn is now underway with some capital works being undertaken, however, this is an ambitious project with over 40 potential projects identified, varying in type, location, scale, programme and cost. These have been shortlisted to an initial set of seven projects to take to concept stage and as the project progresses, funding will be an important consideration to achieve the vision.

21. Facilitation of connections and collaboration across Priorities for Action Projects.

- a) The Delivery Partnership facilitated collaborative events that brought together those with common interest across Priority Projects. These included the subjects of food and food systems, decarbonisation of homes and innovative finance. Participants across these sessions were keen to continue the conversations and there was definite will, energy and enthusiasm to work together around the themes and develop collaborative action. There was a specific call to use the Green Recovery process to amplify and shape this.

- b. An Innovative Finance Task and Finish Group was set up by Welsh Government who now convene the multi-stakeholder group looking at innovative finance for nature conservation in Wales.
22. The Funding Centre Report states that stakeholders still feel there is value to the Priorities for Action exercise and the leadership and challenge provided by the Green Recovery Group. The power to endorse ideas and convene collaborative activity was highly valued, injecting clear strategic leadership and impetus to the agenda.

Green Recovery: [Supporting the Environmental Sector in Wales](#) Report

23. The Green Recovery: Supporting the Environmental Sector in Wales Report examined the stability and resilience of the environmental sector in Wales and aimed to inform the wider discussion about how best to support the sector to create opportunities for a truly 'green recovery'. The report was completed by independent research consultants, The Funding Centre. The report looked at the stability and resilience of the sector pre-COVID and then explored key challenges, opportunities and support priorities for eNGOs as they worked through and started to look beyond the pandemic.
24. Based on findings from this report, at the beginning of 2021, Welsh Government secured £900K of funding for distribution through the National Lottery Heritage Fund (NLHF) to support sector sustainability. Nineteen Grants were made to a broad range of eNGOs and sector support bodies to deliver a very diverse mix of interventions. Activity included improving consultation with supporters and the public, fundraising training and support, project development, developing influencing skills, business planning and network development. Despite the very short window of time in which the funding had to be spent, it was extremely well received and the evaluation from projects was positive.
25. As part of this funded activity, Wales Environment Link delivered a programme of training to members with particularly strong focus on Diversity and Inclusion training. WEL also commissioned a report into innovative funding for the environmental sector to better understand emerging trends in generating funds as well as to signpost opportunities that may be underexploited.
26. At the start of the pandemic WG and NRW moved quickly to establish fora with the environment sector to share insights and emerging issues. This met through 2020 and 2021 and has now evolved into the Enabling the Environment Sector (EES) Group, Chaired by Professor Steve Ormerod which was established in March 2022. With representatives from eNGOs and funding bodies the new group has a clear focus on building the resilience, capacity and impact of the sector.
27. The review by the Funding Centre in 2022 recognises that the conclusions and recommendations from the 2020 report remain equally valid in 2022. The eNGO sector still requires support to build the resilience, capacity and impact of the sector. The creation of the Enabling the Environment Sector Group is seen as positive step

Headline Recommendations from the Funding Centre Report 2022

28. The Recommendations below are taken from the 2022 report by the Funding Centre and relate to the work on Priorities for Action for a green and just recovery and the resilience of the environment sector. More specific commentary and suggestions are included within the body of the report and its detailed recommendations.
- 29. *Keep developing and investing in the Green and Just Recovery model***
- a) The highly ambitious and collaborative model that the Green Recovery Group is developing has enormous merit. The process is imperfect, but the intention has widespread support and real potential. eNGOs are demanding a new way of working with funders and other stakeholders that is

more collaborative and has co-production at its heart. This approach must be continually developed and refined, and successes and challenges shared openly and honestly with all those involved.

- b) The ability of the Green Recovery Group to connect different sectors and to bring disparate stakeholders together is clearly working in part. This ability to convene is becoming increasingly urgent as we need to work to address the immediate demands of social justice whilst accelerating action on climate and nature. It therefore needs to be resourced properly and its status clarified. Ensuring that the Group is fully representative of key stakeholder groups should also be a priority.

30. Stay connected with funders

- a) The Green Recovery Group can assess what additional funding and resource may be made available to actively support those Priorities for Action proposals that have the greatest potential for delivery at scale and the achievement of major impact. It can then influence and work with funders consistently to help direct resource to where it is needed.
- b) The Enabling the Environment Sector Group has the ability to influence funders to collaborate where necessary and to meet the needs of the eNGO sector with targeted funding. This approach worked effectively for short-term, crisis funding but can be developed as an approach.

31. Develop funding models and mechanisms

- a) Work is already underway to explore how different approaches to funding environmental projects can work. This is a very positive move, and that work needs to be developed further as the funding environment tightens and the costs of living crisis filters through to the revenues of eNGOs and the private sector bodies working to affect the green and just recovery. The Green Recovery Group can play a key role in keeping the conversations alive and injecting a sense of urgency.
- b) Core funding remains the highest concern for eNGOs, who are essential partners in driving the recovery. This issue has been explored by many funders over the last 18 months and public sector funders, in particular, are trying to address the challenge within the understandable constraints of public funding. Excellent progress has been made in increasing the length of grant funding contracts from Welsh Government and equal attention now needs to be given to clarifying understanding of core funding as there are many different interpretations of what it means.

32. Develop and test big ideas

- a) The Green Recovery Group should work with funders to develop a package of support to help progress an identified list of pilot projects that draw on the ideas listed in the Priorities for Action report.
- b) The Green Recovery Group should explore the potential to guide support to a modest number of priority pilot projects that could provide a vehicle for testing some of the ambitious and innovative proposals that came forward through the Priorities for Action proposal process. This would generate momentum and help stakeholders to coalesce around some 'big ideas'

33. Communicate and share

- a) Greater focus needs to be given to communicating and sharing the work of the Green Recovery Group. More regular, visible and up to date information needs to be shared widely and all stakeholders should be encouraged to share their successes and challenges. So much good work is being done through the Green Recovery Group without being communicated to the wider community

34. Keep working on resilience

- a) The eNGO sector is still vulnerable and there remain significant discrepancies in terms of capacity between organisations. Their knowledge, their expertise and their reach into communities will be essential if the green and just recovery is going to succeed. They must therefore be supported and encouraged in strengthening their capacity and making their organisations fit for the task in hand.

Next Steps for the Green Recovery Group

35. The Group has continuously reviewed its purpose and position to remain relevant in addressing the needs of a green and just recovery. The Group established itself as a “Group committed to breaking down traditional silos and ways of working, to build on the momentum created through the Covid-19 response, and to work collaboratively and creatively to develop new delivery approaches and models to get things done”.
36. Early in 2022 the Group made a collective agreement to continue, with a commitment to build on the energy, momentum and collective power gained from the previous 18 months. There was a shared desire to continue to utilise that collective power to connect different sectors, drive transformative solutions, unblock barriers and bring on innovative new ideas that could be fast tracked. The Group continue to be convened by NRW and directed by the membership.
37. The Group continues to develop its work programme and will analyse the recommendations and actions from the Funding Centre Report to develop a prioritised action response.
38. The group has recognised the gap in communication and has committed to addressing this.
39. The Green Recovery Group will continue to provide steer and support to the Enabling Environment Sector (EES) Group, chaired by Steve Ormerod. With representatives from eNGOs and funding bodies, the Group (see Appendix 2 for membership) has a clear focus on building the resilience, capacity and impact of the sector after the pandemic and to ensure that environment organisations can not only work together but are able to join in partnership with others in the public, private and third sectors. They will focus on:
 - evolving a strategic overview of grant funding in Wales in relation to environmental/nature outcomes
 - a prioritised action response to relevant recommendations within the new Funding Centre Report (2022)
 - and taking forward work of the Green Recovery Group on sustainable finance models to assist the sector in gaining, organising, and managing investment.

APPENDIX 1: Membership at the inception of the Green Recovery Task and Finish Group (May 2020)

Membership of the Green Recovery Task and Finish Group took existing commitments and membership of individuals in other established fora into account, invitations were extended to those representatives of other sectors across Wales in an effort to draw in additional voices and contributions.

The membership at the inception of the Green Recovery Task and Finish Group included:

- Justin Albert, Director of Wales National Trust
- Peter Davies, Chair of the Welsh Council Voluntary Action; Chair of the Wales Marine Action & Advisory Group (WMAAG)
- Sophie Howe, The Future Generations Commissioner for Wales
- Chris Johnes, Chief Executive of Building Communities Trust Wales
- Lesley Jones, Chief Executive of Keep Wales Tidy
- Prof Calvin Jones, Cardiff Business School, Cardiff University
- David Lea-Wilson, Director of Halen Môn, LPM Community Woodland Group
- Cllr Andrew Morgan, Leader Welsh Local Government Association (WLGA), supported by Tim Peppin, WLGA
- Peter Perry, Chief Executive of Dŵr Cymru Welsh Water
- Sue Pritchard, Chief Executive of the Food, Farming and Countryside Commission
- Vivienne Sugar, Chair of the Bevan Foundation
- Cathy Weatherup, Chief Medical Officer, Welsh Government

Members of the group capitalised on their own extensive networks to inform the work:

- Peter Davies has worked with the Wales Marine Action and Advisory Group (WMAAG)
- Chris Johnes linked up with members of the Community Sector Network, which includes local community organisations across Wales, and sought ideas of local grassroots initiatives which could help progress the green recovery.
- Lesley Jones has worked with the Wales Environment Link (WEL) Green Recovery Group and the wider network of third sector environment groups.
- The Future Generations Commissioner for Wales held a roundtable event to bring the groups and networks focussed on Covid-19 recovery together
- The WLGA has been working with local authorities to develop a programme of activity to support the economic recovery whilst also generating social and environmental benefits.
- NRW Board member Howard Davies has provided specific input and steer to consultants reporting on stabilising the environment third sector.

APPENDIX 2: Membership of the Enabling the Environment Sector (EES) Group (June 2022)

Name	Title and Organisation
Steve Ormerod (Chair)	Board Member (NRW)
Bronia Bendall (Secretariat)	Senior Specialist: Green Recovery (NRW)
Matthew Brown	Director of Operations (WCVA)
Gareth Cunningham	Marine Conservation Society
Joanne Doyle	Strategic Approaches and Programmes Team Leader (NRW)
Julie Hughes	Wales Development Officer (National Lottery Heritage Fund)
Michele Hunt	Head of Funding Development (RSPB)
Lesley Jones	CEO (Keep Wales Tidy)
Eileen Kinsman	Interim Co CEO (Centre for Alternative Technology)
Julia Korn	Senior Manager, Business (PONT)
Gail Merriman	Head of Green Recovery (Welsh Government)
John Rose	Wales Director (National Lottery Community Fund)
Rachel Sharp	CEO (Wildlife Trusts Wales)
Alice Teague	Deputy Director, Marine (Welsh Government)
Karen Whitfield	Joint Director (WEL)
Sarah Williams	Head of Corporate Strategy and Performance Management (NRW)

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IEPAW

Interim Environmental Protection Assessor for Wales

Annual Report 2021/2022

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Foreword



The role of the Interim Environmental Protection Assessor for Wales (IEPAW) was created to consider concerns about the functioning of environmental law in Wales. It has been a

privilege for me to occupy this position since its inception in March 2021 and I'm glad to present my first annual report in this role.

Preserving the natural environment is one of the greatest challenges currently faced by humanity. From the impact of greenhouse gases in the atmosphere, to the quality of the water in our rivers and the protection of our forests, the environment touches upon the lives of every person in Wales and in other countries as well. Consequently, it is vital that we have the strongest possible legal framework in place to ensure its protection.

The first year of the IEPAW has been both rewarding and challenging. The volume of submissions that I have received during this time clearly demonstrate that there is a high degree of public engagement with the subject of environmental protection and an appetite to ensure that the law protects the environment in Wales. During this time, my team and I have been working hard to set up a service that ensures the concerns of the public about the functioning of environmental law are properly considered and highlighted to policy makers and regulators in Wales.

I am grateful for the opportunity I have had to carry out this important role over the last 12 months and look forward to the challenges that lie ahead.

Introduction

Dr Nerys Llewelyn Jones was appointed as the Interim Environmental Protection Assessor for Wales (IEPAW) in March 2021 to consider concerns raised by the public about the functioning of environmental law in Wales. This is an interim process that will be in place until a permanent body is established in Wales to oversee compliance with environmental law.

Dr Llewelyn Jones was contracted for a period of up to two years with the option of a one-year extension. She was contracted for a minimum of 20 days per annum. In practice, she has worked for between two and three days per month on IEPAW business.

The IEPAW is independent from the Welsh Government, although Welsh Government officials provide secretariat support to the IEPAW. Our focus is on the functioning of environmental law, not on breaches of that law.

Our aims are to:

- provide oversight of the functioning of environmental law in Wales; and
- to consider systemic issues relating to the working or functioning of environmental law in Wales.

Our role does not cover:

- breaches in environmental law;
- areas of non-compliance of environmental law; and
- issues raised that are covered by another complaints mechanism or process.

Our aim is to identify where action can be taken to improve the functioning of environmental law in order to improve environmental outcomes.

Details on how to raise a concern about the functioning of environmental law in Wales, as well as our terms of reference, are available at gov.wales/raising-concern-about-functioning-environmental-law

We have committed to publishing an annual report on the submissions we have received and any action we have taken in relation to them. This is the first annual report and covers the period 1 March 2021 to 28 February 2022.

Initial activities undertaken by the IEPAW

During the first 6 months, our primary focus was on putting in place the relevant processes and resources to enable us to carry out our role. This preparatory work included publishing information on the IEPAW, agreeing terms of reference, and putting in place a secretariat team to support the IEPAW.

Given that this is a new role, it has also been important in the first year to ensure that there is awareness of our function and how we can assist with ensuring that environmental law in Wales functions as it should. As such, stakeholder engagement has been an important part of the work we have undertaken over the last year.

Since March 2021, we have undertaken stakeholder engagement with a number of key regulators, partners and organisations across Wales' environmental and regulatory landscape.

With the aim of establishing an extensive professional network across Wales, we have met with representatives from a number of partner organisations including (non-exhaustively): the Auditor General for Wales; Natural Resources Wales (NRW); DEFRA; the Future Generations Commissioner for Wales; the Public Services Ombudsman for Wales; the Welsh Local Government Association; and the Law Commission. In addition, the IEPAW regularly meets with the UK's other environment bodies (further details below).

We have also engaged with a number of other organisations including the United Kingdom Environmental Law Association (UKELA), Greener UK/Green Alliance, RSPB Cymru, the National Farmers' Union (NFU), Wales Environment Link, the Environmental Governance Stakeholder Task Group, Dŵr Cymru, the Independent Environmental Advisory Panel (IEAP) to Dŵr Cymru Welsh Water and Environmental Platform Wales.

Alongside these stakeholders, we also meet with relevant officials within Welsh Government to discuss submissions received as well as relevant new and emerging issues.

Cross-border engagement

Given the cross-border nature of many environmental issues, it is important that we build and maintain constructive working relationships with our counterparts in the other nations of the United Kingdom. For this reason, we regularly meet with representatives from the Office for Environmental Protection ("the OEP") and Environmental Standards Scotland ("ESS"). These meetings are an invaluable forum for co-operation and exchange of information, enabling the three bodies to discuss our shared priorities, flag emerging issues, and share information on best practice. These meetings have been particularly useful given that, over the past year, all three bodies have been going through a period of establishment.

To strengthen this relationship further, we are currently working towards agreeing a tripartite memorandum of understanding with the OEP and ESS that will set out how the three bodies will seek to cooperate and share information. We intend to agree this memorandum during the course of 2022. The memorandum will be published on the IEPAW webpages once it has been agreed.

Process

We aim to provide an initial response to submissions within 20 working days of their receipt. During this year, we have responded within this timeframe for all but one of the submissions received. In this case, further analysis of the submission was required and a response was issued one day after the deadline.

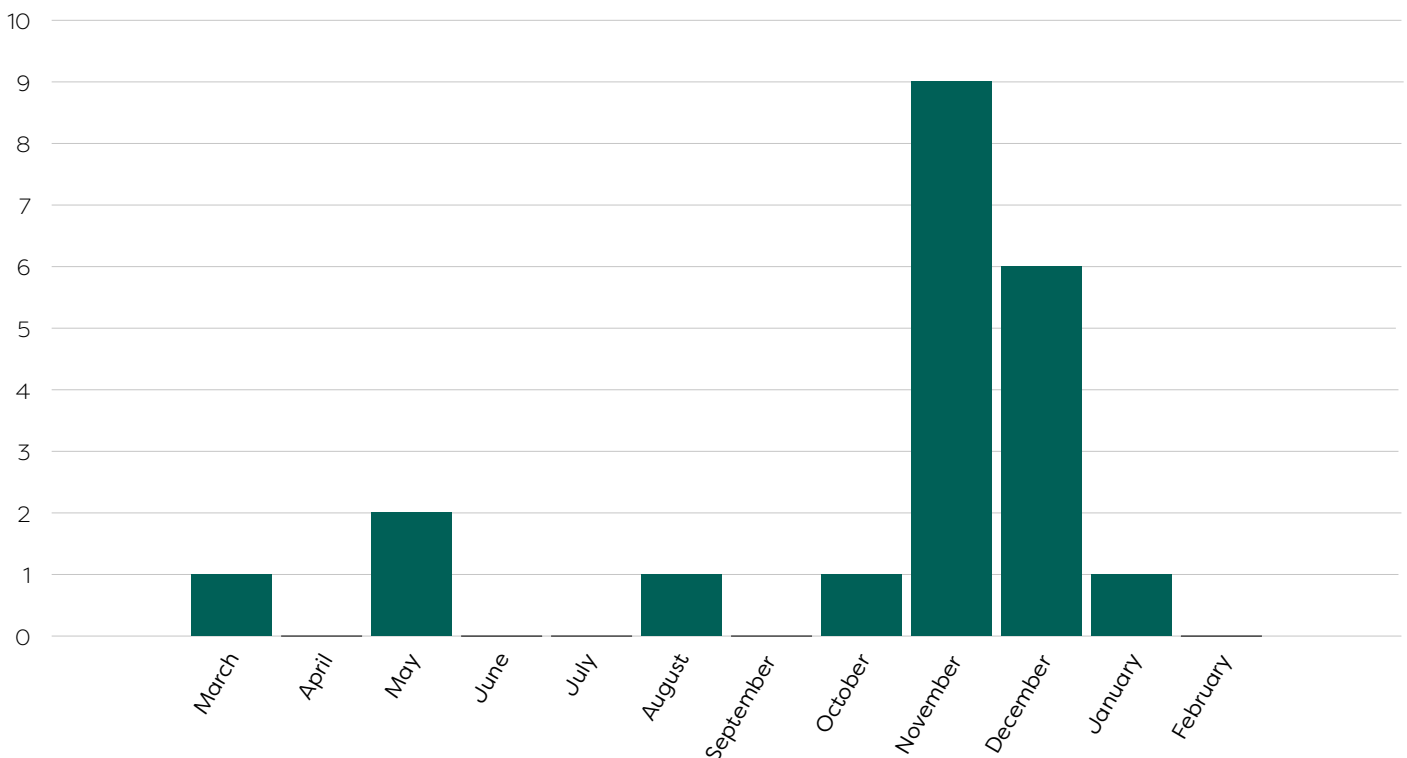
When a submission is received, it is subject to a scoping exercise to determine whether it relates to the functioning of environmental law in Wales and so can be considered by us. If the submission is within scope, then it will also undergo a prioritisation exercise to decide whether it should be the subject of a report for Welsh Ministers. Given the volume of submissions we receive, it is not possible to produce a report for each of them. Instead, we aim to target our resources to the issues that we consider to be of the highest priority.

Submissions received

During 2021/2022, we received 21 submissions covering a wide range of different environmental issues.

We received a steady number of submissions during the initial six months of the year, but there was a notable spike in submissions during November and December (15 submissions in these two months alone). These submissions accounted for the majority received during the year.

Figure 1: Number of cases received by calendar month for 2021/2022

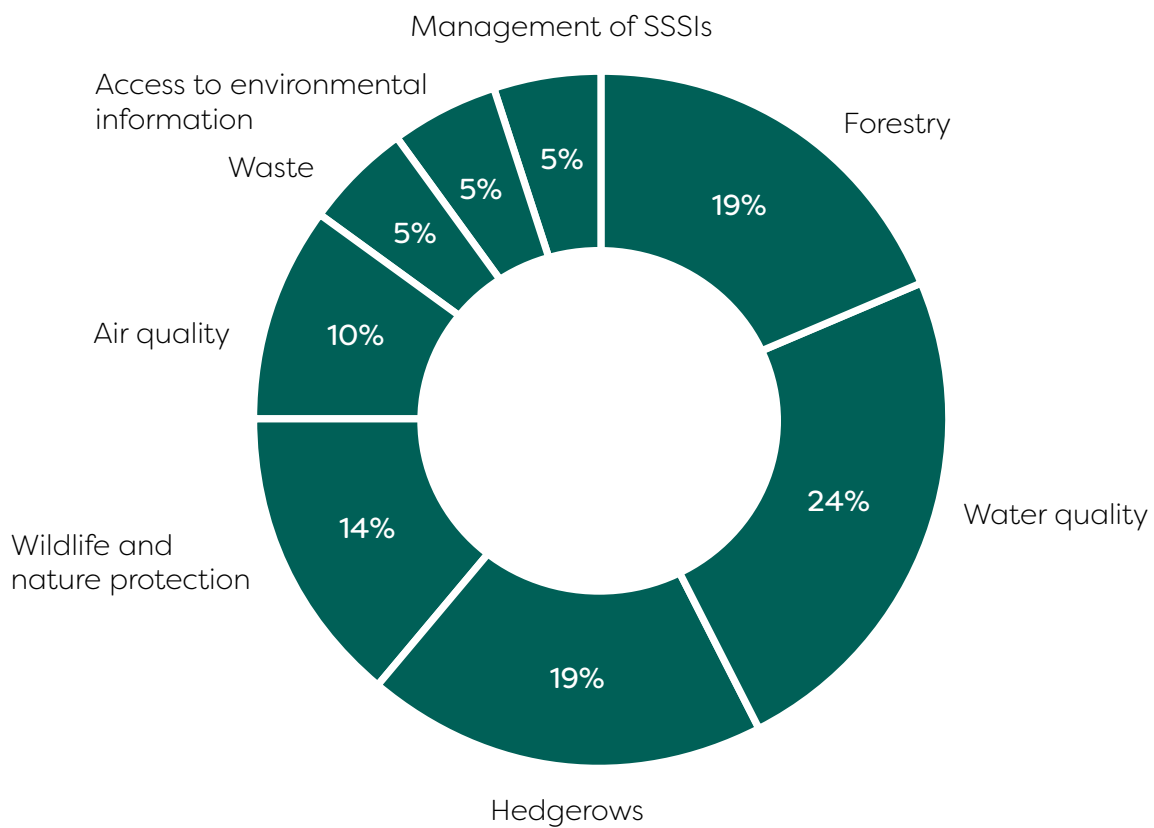


The environmental concerns covered in these submissions included:

- Four submissions related to forestry
- Five submissions related to water quality
- Four submissions related to hedgerows
- Three submissions related to the protection of wildlife and nature

- Two submissions related to air quality
- One submission related to waste
- One submission related to access to environmental information
- One submission related to the management of Sites of Special Scientific Interest

Figure 2: Breakdown of submissions received



Of these submissions, six were considered to be outside the scope of the IEPAW process so were not taken any further. In most cases, this was because the submissions related to potential breaches of environmental law, which we do not have the legal authority to investigate, or because they related to matters that were subject to potential or ongoing legal action. Six submissions were within scope

of the IEPAW process and are currently being considered. We are still determining whether aspects of the remaining submissions are within scope. In some cases, we have sought further information from the submitter or relevant public authorities to establish whether they are in scope and to carry out an initial consideration of the issues raised.

Key themes

Forestry

One of the key themes that emerged from the submissions we received related to forestry issues. In particular, submitters raised concerns about the interaction between tree preservation orders (TPOs), the Forestry Act 1967, and planning law in Wales.

One submitter expressed the following concerns:

- TPOs and felling licences are not effective mechanisms for preventing unlawful felling of trees;
- Planning law does not adequately consider the requirements set in the Forestry Act or the long-term impact of tree felling for development; and
- There should be a more joined-up approach between the different pieces of legislation relating to tree felling.

Another submitter wrote to us to suggest that the Government should amend the Forestry Act 1967 to ensure that wildlife conservation is taken into consideration when tree-felling licences are granted.

Finally, we received a submission about NRW's obligation to maintain a Regional Advisory Committee under the Forestry Act 1967. We did not consider that this submission was within scope. Nevertheless, we raised the issue with NRW directly and sought information on the status of the committee to relay back to the submitter.

We are producing a report on the issues raised in the first two submissions above for the Welsh Ministers. This report, and the Minister for Climate Change's response, will be published in due course.

Water quality

The theme that we received the most submissions on was water quality.

One submitter raised concerns on the following issues in relation to sewage discharges into Welsh rivers:

- The availability and use of enforcement mechanisms in relation to sewage overflow licences issued to private water companies and whether they are fit for purpose; and
- Whether there should be a legal requirement to monitor the volume of sewage released into watercourses by private water companies.

Another submitter expressed the view that NRW was failing to correctly interpret and enforce retained EU law in relation to storm overflows.

A third submitter also raised concerns about human waste in Welsh rivers and expressed the view that the regulator was not taking adequate enforcement action against water companies.

Another concern was raised about illegal pollution in rivers due to slurry, milk, mud, etc. The submitter alleged that this had resulted in the death of thousands of fish and invertebrates. They considered that the regulator was not able to enforce the law effectively due to a lack of resources and ineffective legislation.

Finally, we received a submission on environmental protection in the Severn basin. In particular, this submission raised concerns about the impact of poultry farming on water quality. The submitter also suggested that there was insufficient co-operation between the UK and

Welsh governments and stated that there had been a failure of cross-border environmental governance.

Given the number of submissions received on the theme of water quality and their potential severity, we intend to produce a report on this issue. In line with our role of reviewing the functioning of environmental law, it is likely that this report will focus on the legislative framework on water quality.

We are aware that the Senedd Committee on Climate Change, Environment and Infrastructure (the CCEI Committee) has recently carried out its own inquiry into storm overflows in Wales. The Committee's report is available at <https://senedd.wales/media/v4apg5wb/cr-ld15015-e.pdf>. We are following these developments with interest, and will monitor what action is taken in response to the report's recommendations. Given the timescales set out by the Committee for the various parties to report on their activities, we envisage that our own investigation will commence in the latter half of 2022.

Hedgerows

Another key theme that we identified was the preservation of hedgerows.

One submitter raised a number of concerns in relation to this issue. In their view, the Hedgerow Regulations 1997 do not meet their stated aim to protect hedgerows effectively. They were concerned that the Hedgerow Regulations allowed the removal of a substantial amount of hedgerows. The submitter considered that local authorities either did not understand them or did not have sufficient resources to apply them. They also raised concerns about the fact that the Hedgerow Regulations only applied to farmland and not parks or

gardens, and they considered that there were arbitrary standards about what constituted a hedgerow.

Another submitter wrote to express their concern that grant funding available from the Welsh Government was encouraging farmers to remove overgrown hedges and replace them with new ones. They were concerned that this activity may have an adverse impact on biodiversity.

Finally, we received two submissions regarding the use of bird-deterrent netting on hedgerows, particularly where developers were seeking permission to remove the hedges. These submitters were concerned that such practices would negatively affect bird populations by preventing them from roosting.

We are actively considering the concerns raised in these submissions. Although we have no immediate plans to produce a report on this theme at this time, we do not rule out considering this area of legislation in the future.

Reporting to the Welsh Ministers

During the period 1 March – 28 February 2022 we did not produce any reports for the Welsh Ministers. However, we are in the process of finalising our first report and will issue it to the Welsh Ministers as soon as possible in 2022. As discussed above, this first report will be on the subject of forestry and in response to two separate submissions received by the IEPAW during 2021.

Process review

This has been the establishment year of the IEPAW and therefore significant time has been spent putting in place the relevant processes to enable our work to be undertaken. During that time, we have been constantly reviewing and amending those processes, taking in to consideration the number and type of submissions received, feedback from stakeholders, and lessons learned during our first year of operation.

As part of this review we have put in place new processes for scoping new submissions received to determine whether they are in scope of the IEPAW. As part of this process, we will identify key legislation/case law and any wider issues, including media attention and any work that the Government or other bodies are undertaking in relation to the issues raised.

One key issue identified during the review has been that demand for the service has been significantly higher than originally expected. In light of this, we have been working to put in place more robust processes to ensure that we are targeting our resources at issues where we can add the most value. A key part of this is the development of prioritisation principles that we will use when assessing which submissions may warrant a report for the Welsh Ministers. We will publish further details on these principles in 2022.

Another issue identified was that submissions frequently lacked sufficient detail to allow us to determine whether a report to the Welsh Ministers may be warranted. In many cases, this has meant that we have had to enter into further

correspondence with the submitters, as well as other interested parties, to obtain the information needed to assess whether to take a submission forward. In addition, we also received a significant number of submissions that fell outside of the scope of our remit.

In order to mitigate these issues in the future, we are working to introduce a form for use by submitters. The aim of this form is to ensure that we receive the information we require at the outset, reducing the time and resources spent following up on concerns. Also, this form will hopefully ensure that fewer submissions are received that are not within remit as it will be clear for users what types of issue we may consider. We will publish this form in early 2022.

In addition, we are producing an infographic setting out the different environmental regulators operating in Wales. This will help to ensure that the public are directing their concerns to the most appropriate body.

Feedback

If you have any comments about this report or our role, or if you wish to raise a concern about the functioning of environmental law in Wales, please contact IEPAW@gov.wales.

Agenda Item 4

Pwyllgor Newid Hinsawdd, yr Amgylchedd a Seilwaith /
Climate Change, Environment and Infrastructure Committee
Adferiad Gwyrdd a Mesurau llywodraethu amgylcheddol dros dro/
Green Recovery and Interim environmental governance arrangements
GR / IEG 01
Ymateb gan Yr Athro Steve Ormerod, Ysgol Biowyddorau Caerdydd
Evidence from Professor Steve Ormerod, Cardiff School of Biosciences

Interim Environmental Governance Measures

Having sat on the initial WG panel – chaired by Bob Lee – and having met once informally with the Interim Environmental Governance Assessor (IEGA), my areas of interest are in:

- i) The time and resources given to the role (2-3 days per month) relative to the function – prior to the UK exiting the EU - that this office was designed to replace
 - ii) Again relative to the EU functions that this office replaced, the stated aims of the assessor to:
 - “• provide oversight of the functioning of environmental law in Wales; and
 - to consider systemic issues relating to the working or functioning of environmental law in Wales.
- But not
- “• breaches in environmental law;
 - areas of non-compliance of environmental law”
- iii) The relationship with the OEP in England and ESS in Scotland
 - iv) Whether there are lessons to learn from the submissions received – dominantly on forestry, water quality, , hedgerows, wildlife, nature and planning designations (SSSIs)
 - v) Whether there are generic actions that stem from iv) that Wales should address

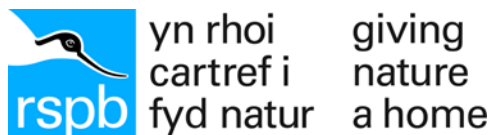
On Green Recovery:

My specific interest is in support for the environmental sector in Wales following roles over the last 25 years in senior governance roles in this sector including as Chairman of RSPB Cymru, Chairman of RSPB Council, RSPB Vice-President and Chairman of the European Invertebrate Charity, Buglife. I am also currently chairing a committee, on behalf of NRA, seeking to enable the environmental sector. I sit also of the panel helping the Minister for Climate Change in the Biodiversity Deep Dive.

Specific points of interest are in:

1. The roles and functions of the environmental sector in addressing the Nature and Climate Emergencies – and more latterly what will become the outputs from the Biodiversity Deep Dive
2. The roles and functions of the environmental sector in green recovery
3. Support, resourcing and funding of the environmental sector – and the specific role of the Welsh Government
4. The actions needed within the environmental sector that best enable to access support
5. The development of skills in Wales to best support the environmental sector as the economy develops towards addressing the nature and climate emergencies in future

Pwyllgor Newid Hinsawdd, yr Amgylchedd a Seilwaith /
Climate Change, Environment and Infrastructure Committee
Adferiad Gwyrdd a Mesurau llywodraethu amgylcheddol dros dro/
Green Recovery and Interim environmental governance arrangements
GR / IEG 02
Ymateb gan / Evidence from RSPB Cymru



Interim Environmental Governance Measures

RSPB Cymru paper to the Climate Change, Environment and Infrastructure Committee

1. The operation of the Interim Environmental Governance measures in Wales

Introduction

When the UK left the EU, the role of the EU institutions in providing oversight and enforcement of EU environmental laws ended. This governance framework provided accountability and access to justice for citizens, who were able to raise complaints with the European Commission, free of charge, if they felt their national government was failing to implement or abide by the law. The Commission could investigate, advise, and ultimately take enforcement action. Our departure from the EU also meant the loss of a framework of high level, guiding environmental principles enshrined in the EU Treaties.

The Welsh Government recognised this governance gap, and promised in 2018 to take the first legislative opportunity to bring these environmental principles into Welsh law and to introduce new domestic arrangements for environmental governance. Ministers have since accepted the recommendations of a specially convened stakeholder task group on how to do this. These recommendations included:

- enshrining the core environmental principles, with a high level environmental objective, into Welsh law, with a duty on Ministers to apply them; and
- establishing a new, independent environment Commission to oversee the implementation of environmental law in Wales, including providing a route for citizens to raise complaints, powers to investigate breaches, undertake inquiries, and take enforcement action where necessary.

Equivalent laws have now been enacted for Scotland, England and Northern Ireland, and new bodies – Environmental Standards Scotland and the Office for Environmental Protection (for England and Northern Ireland) – have been created. We are extremely concerned that in Wales there is still no clear timeframe to bring this legislation forward. This leaves us with a gap in our environmental legislation and a de facto weakening of

protection, as well as a reduction in citizens' rights, in spite of the Welsh Government's commitments to the contrary.

Following the Senedd declaration of a nature emergency, we welcomed the Climate Change Minister's commitment to bring forward legislation on environmental governance and principles and nature recovery targets in one environment protection bill; this commitment is backed up in the revised Programme for Government following the co-operation agreement. This makes sense, as the environmental governance body should have a role in advising government as to whether delivery matches up to ambition.

As set out in the RSPB Cymru/WWF Cymru report 'Putting Wales on Path to Nature Recovery', statutory targets are a key missing piece in Wales' framework of legislation relating to the natural environment. In other policy areas, such as waste and climate change, ambitious targets have been a catalyst for action. We advocate setting high level targets in primary legislation, with a framework setting out requirements for a detailed suite of SMART long term and interim targets in secondary legislation. The primary legislation should include a duty on the Welsh Government to halt and begin to reverse the loss of biodiversity by 2030 and achieve substantive recovery by 2050. This aligns with the international call, in the lead up to the 15th Conference of Parties under the UN Convention on Biological Diversity (CBD), for governments to commit to a new global goal to be Nature Positive by 2030.

Interim Environmental Governance Measures – experience to date

RSPB Cymru welcomes the role of Interim Environmental Protection Assessor for Wales (IEPAW) as a short term stop gap while permanent measures are developed. Our chief concern is that the work to develop permanent, statutory measures has stalled and there is a risk that the interim measures will be in place longer than the two years originally envisaged by the Welsh Government.

It is clear that the IEPAW role is no substitute for the promised statutory measures. In particular, the IEPAW cannot consider complaints regarding perceived breaches of or non-compliance with environmental law (the IEPAW Annual Report indicates that a number of the issues raised represented potential breaches and therefore could not be considered). As is made clear on the Welsh Government web-page regarding the IEPAW role, such matters would need to be pursued via existing mechanisms such as Judicial Review.

RSPB Cymru has had the opportunity to meet with IEPAW both directly and as a member of the Welsh Government's stakeholder task group on environmental governance (although this task group has not met for many months and we have no indication of future plans). We note that, in the email circulation of the annual report it was indicated that IEPAW would put quarterly stakeholder meetings in place, which we welcome.

The IEPAW role, as far as we are aware, has not been widely promoted and finding the relevant Welsh Government web-page depends on people knowing what to look for online. We note that a submission form has only very recently been added to the web-page, to help people to provide sufficient information for consideration.

Examples of relevant environmental matters that have not been addressed since the disapplication of the EU governance structures in Wales following EU withdrawal

The IEPAW's annual report states that six of the 21 submissions received were deemed out of scope because they related to potential breaches of environmental law or were subject to potential or ongoing legal action. It is not clear which area or areas these fell into – nature and wildlife protection, SSSI management, air quality, water quality, waste, access to environmental information, hedgerows or forestry – or whether they are matters which might in the past have been raised with the European Commission as breaches of EU law.

The following are examples of past interventions by the European Commission which illustrate the gap that exists in Wales at present:

The RSPB raised a complaint with the Commission in 2012 over concerns that the UK and devolved governments were failing to protect seabirds adequately in line with the EU Birds Directive. The resulting talks between the Commission and the UK Government led to the designation of new marine Special Protection Areas (SPAs) in all four UK countries. In Wales, this included protection for foraging terns off Anglesey, puffins and gannets around the Pembrokeshire Islands, and red-throated diver wintering in Cardigan Bay.

In March 2021 the Court of Justice of the EU (CJEU) ruled that the UK had systematically and persistently failed to fulfil its obligations under EU rules on air quality (after the Commission started proceedings against the UK in 2014); this ruling could lead to financial penalties should the UK Government fail to secure remedial action, but it is not clear whether the case will be pursued now that the UK has left the EU¹. These failures, by both UK and Welsh Governments, have also been challenged successfully in the domestic courts by Client Earth. The Office of Environmental Protection will be the body to hold UK Government accountable in respect of future challenges; but there is thus far no independent body to hold the Welsh Government to account.

A future environmental governance body in Wales should also have the remit of holding Government to account regarding progress towards its environmental commitments and objectives. As an example, the OEP has recently published a challenging report to UK Government in respect of its 25 Year Environment Plan², highlighting the gap between ambition and delivery. There is substantial evidence of a similar gap in Wales – for example, NRW's baseline assessment of protected sites³ which found 60% of features (where there is enough data to make a judgement) to be in unfavourable condition; for around half of our SSSIs there is insufficient information available for an assessment to be made. Robust, independent governance is needed to help address this gap.

¹ See <https://www.clientearth.org/latest/press-office/press/top-court-confirms-uk-has-broken-air-pollution-law/>

² [Taking stock: protecting, restoring and improving the environment in England | Office for Environmental Protection \(theoep.org.uk\)](https://www.theoep.org.uk/taking-stock-protecting-restoring-and-improving-the-environment-in-england)

³ <https://naturalresources.wales/evidence-and-data/research-and-reports/protected-sites-baseline-assessment-2020/?lang=en>

The IEPAW does not have this level of independence from Government; as is clear from the annual report, IEPAW's first issue-based report to the Welsh Government has been supplied directly to Government and will be published alongside the Minister's response.

Comments on the IEPAW's report

The report is a fairly high level summary and it is not possible to anticipate from it what we should expect to see in IEPAW issue-based reports to Government. In addition to the reflections above, we are struck by the statement that the number of issues raised with the IEPAW has been higher than anticipated. This indicates that there is significant concern in Wales regarding the implementation of environmental law; the governance gap is real and must be addressed.

2. Green Recovery

Progress in taking forward the 'priority actions' identified in the [Green Recovery: Priorities for Action](#) report

Besides work on the National Nature Service (NNS – see below), which has been largely independent of the Green Recovery Group and NRW, we are not aware of substantive progress on other priorities identified in the report or budget allocated to take them forward.

Progress in taking forward the recommendations in the [Green Recovery: Supporting the environmental sector in Wales](#) report

A new working group has been established, chaired by Professor Steve Ormerod, on Enabling the Environment Sector; the group has met three times to date (RSPB Cymru is one of the participating WEL representatives). We are keen that this group focuses not only on making the sector *resilient*, but ensuring it has the capacity and capability to succeed in helping to tackle the nature and climate emergency. It is expected that this group will shortly review an update report on the original report, and will develop a roadmap/action plan for implementation.

Key issues remain to be resolved, for example the call for core funding for the sector. The call for multi-year funding programmes is answered to some extent by the Nature Networks Programme, but we note that this fund is not yet open and there is a risk that delay will impede the prospects for delivery of works in the current financial year.

The development of the [National Nature Service](#) for Wales.

Over the past two years, RSPB Cymru has been part of a group of over 100 stakeholders across Wales that has convened to develop a proposal for delivering nature restoration, alongside new pathways for green jobs and skills through a National Nature Service (NNS) for Wales. Research commissioned by RSPB Cymru early in this process indicated that investment in restoring and creating priority habitats, as well as delivering a wide range of ecosystem services or nature-based solutions, has the potential to create around 7000 jobs⁴.

⁴ [\(PDF\) Developing a Green Workforce in Wales Estimating the Scale of the Need and Opportunity | rspb cymru - Academia.edu](#)

The most recent proposal for an NNS has outlined a vision for the Valleys Regional Park to become an 'early adopter'; a powerful opportunity to trial and showcase green job opportunities in an area that would thrive from the social, environmental and economic benefits.

We are delighted that the Welsh Government has now allocated funding to the further development of the NNS, and we are awaiting further information about how this will be taken forward.

Pwyllgor Newid Hinsawdd, yr Amgylchedd a Seilwaith /
Climate Change, Environment and Infrastructure Committee
Adferiad Gwyrdd a Mesurau llywodraethu amgylcheddol dros dro/
Green Recovery and Interim environmental governance arrangements
GR / IEG 03
Ymateb gan Coed Cadw / Evidence from Woodland Trust

Climate Change, Environment and Infrastructure Committee on 30 June: Environmental governance and green recovery.

Response to questions by Coed Cadw – the Woodland Trust

Coed Cadw -The Woodland Trust is the UK's largest woodland conservation charity, working for a UK rich in native woods and trees, for people and wildlife. In Wales we have over 26,000 supporters. We manage over 100 sites in Wales covering 2,897 hectares (7,159 acres). Wales is one of the least wooded countries in Europe, with woodland making up just 14% of the landscape and less than half of this is native woodland

Interim Environmental Governance Measures

1. Your experience of the operation of the Interim Environmental Governance Measures to date;

- 1.1. We welcome the interim measures but support the call by Wales Environment Link to bring forward legislation as soon as possible to secure permanent measures. The delay hopefully is allowing the Welsh Government to assess the effectiveness of measures taken in England and Scotland and plan truly effective measures for Wales.
- 1.2. We think it is essential that there is an effective and independent environmental body to hold public authorities to account on their environmental commitments.
- 1.3. Such a body should emulate the oversight and enforcement provided by European institutions by enabling citizens to raise complaints, free of charge and where necessary carry out investigations that support court action.
- 1.4. The Interim Assessor has carried out a substantive investigation on woodland protection but we cannot judge its impact or effectiveness as nothing has as yet been published.
- 1.5. There does not appear to be any readily available information on topics of active interest to the Assessor or on how evidence is gathered for the preparation of reports. We were able to provide input to the investigation on forestry matters but not to that on hedgerows.
- 1.6. It is unclear how the Assessor interacts with the Well-being of Future Generations Act and the Future Generations Commissioner, or with the wider suite of enforcement bodies. Effective environmental governance requires all these aspects to work well together.

- 1.7. Wales is showing international leadership in commitments and mechanisms to achieve sustainability and climate goals and with the foundation provided by the WCFG Act Wales has the opportunity to put in place truly world leading environmental protection and governance.
 - 1.8. Reports will not be published until a response has been obtained from Welsh Ministers. Transparency is needed regarding the influence of Government Ministers on the content of reports and the independence of the Assessor.
- 2. Examples of relevant environmental matters that have and have not been addressed since the disapplication of the EU environmental governance structures in Wales following EU withdrawal.**
- 2.1. In general, governance is needed to address the gap between policy ambition and the willingness and ability to enforce that ambition. Otherwise, governments can enact attractive sounding policies with little intention of delivery.
 - 2.2. Relevant matters include the lack of or failure of regulation to protect water quality, air quality in relation to ammonia emissions, ensure the monitoring and management of sites protected for nature; or protect ancient trees and woodland and prevent declines in urban and rural tree cover.
 - 2.3. We know that many aspects of the condition of trees and woodland are in general decline ([The State of the UK's Woods and Trees](#)) despite numerous policy commitments and initiatives. We know policies are under consideration that may make matters worse, for example in relation to biosecurity and carbon accounting.
 - 2.4. There are examples of policy and regulation being ineffective because of lack of basic environmental monitoring information, for example on the condition of protected sites and on water quality.
 - 2.5. Numerous matters of potential concern have been highlighted by the Future Generations Commissioner and many others, for example in relation to the ineffectiveness of the planning system in preventing habitat degradation and pollution.
 - 2.6. The complexity and confusion of interactions between UK and devolved responsibilities and law make it difficult to clearly understand how environmental governance is now achieved.
- 3. Any comments on the Interim Environmental Protection Assessor's report**
- 3.1. We found the Assessor's report concise and readable.
 - 3.2. We welcome the interest in hedges, which we were not aware of.
 - 3.3. It is apparent that only a minority of submissions are judged suitable for consideration, suggesting that the Assessor's remit is very limited and that it is difficult to prepare effective submissions. There is no discussion of social justice dimension - ensuring that environmental justice is fairly and readily available to everyone.
 - 3.4. It is noted that demand for the service has been higher than expected. This is despite the low profile and limited scope of these interim measures.

Green Recovery

4. Progress in taking forward the ‘priority actions’ identified in the Green Recovery: Priorities for Action report;

- 4.1. The “Priority Action” we are most actively taking forward is on urban tree cover – submitted as a “Tree Towns” proposal. We have been able to continue discussions with an informal external stakeholder group and have been able to bring some funding from a UK corporate partner to support work by Cardiff Council.
- 4.2. We continue to work closely with Wrexham Council and will shortly publish an independent review of their experience in preparing their Tree and Woodland Strategy and the barriers they have experienced in implementing it.
- 4.3. At UK level we are working with the US charity American Forests and Centre for Sustainable Healthcare to commission work to gather data on tree equity in the UK – mapping inequalities in tree cover and combining this information with socio-economic data sets to identify where lack of tree cover and green space is contributing to social, health and economic deprivation
- 4.4. NRW have been very supportive of this work but no significant additional resource has been forthcoming through any green recovery initiative.
- 4.5. There are wider developments which if sustained at scale will lead to a greener economy. These include investment shifts from road building to active travel and green infrastructure; support for more sustainable farming; shifting of some flood prevention funding to land management measures; and disinvestment in fossil fuels in favour of energy efficiency and renewables.

5. Progress in taking forward the recommendations in the Green Recovery: Supporting the environmental sector in Wales report;

- 5.1. The observations made in the 6 “recommendations” made in the report are largely still current and the main challenges remain, including:-
 - *“building reliable, predictable and efficient funding within this sector”*
 - *“Whether it is the lack of resource, the inexperience, the culture or the competitive funding environment, there is a strong sense that insufficient collaboration is taking place.”*
 - *“....NRW is stretched at present, and that a better-resourced organisation could do even more to support the wider eNGO sector.”*
 - *“.....strong support for the idea of a Green Recovery for Wales and agreement that we cannot continue with “business as usual”. Far more needs to be done to support innovation and to bring about the conditions that promote it.”*

6. The development of the National Nature Service for Wales.

- 6.1. We remain interested in the concept of a National Nature Service but have not been in a position to actively commit resource to program development. For us there are structural challenges to gearing up to employ significant numbers of additional and



inexperienced staff and we would need there to be funding and a support framework in place to make that a possibility.

- 6.2. At present the concept of a new “green jobs” initiative appears stuck by barriers of program development resource, funding and possibly labour availability. We currently have [31 vacancies](#) available at UK level.

Jerrylangford@woodlandtrust.org.uk

8 June 2022

Pwyllgor Newid Hinsawdd, yr Amgylchedd a Seilwaith /
Climate Change, Environment and Infrastructure Committee
Teithio ar fysiau a'r rheilffordd yng Nghymru / Bus and rail transport in Wales
BRT10
Ymateb gan / Evidence from West Coast Partnership

West Coast Partnership welcomes the opportunity to submit views in response to the Climate Change Environment and Infrastructure Committee's call for evidence for its inquiry into public transport in Wales.

West Coast Partnership operates Avanti West Coast (the busiest mixed-use railway in the UK) and is the 'Shadow Operator' for HS2: designing, developing and mobilising high speed service operations and the associated conventional services. Our vision is to deliver a progressive railway that generates prosperity and pride across all the nations we serve and we stand ready to work with all partners to collaboratively promote and develop rail as we look to drive regional growth and deliver exceptional services for the benefit of customers and communities on our route.

Comments are provided below on each of the three main lines of inquiry. Given our role as a provider for rail services our views relate predominantly to rail – however we recognise that connectivity between various modes of public transport represents an opportunity for significant and sustained modal shift.

1) Priorities for post covid recovery for Welsh bus and rail

The pandemic has presented challenges, but also an opportunity for the rail industry, alongside and supported by Government, to continue to develop new ways of working that have collaboration and customers at the heart of everything that we do. We will continue to work with Government and others to support ongoing recovery and to create a better, more responsive offer for customers that also presents real value for taxpayers.

As a result of the pandemic, we have seen changes to traditional travel patterns and people are now starting to use public transport in a different way than previously. With more flexible working arrangements in place for many people we have seen a move away from expected rush hour spikes consistently across the week. Leisure demand at weekends has grown significantly across our network and on some routes has surpassed pre-covid levels. Building on the agility we and the rail industry demonstrate during Covid, we aim to maintain flexibility and grow services responding to such changing patterns of use through, for example, the timetables that we deliver and also ticketing products on offer.

In order to continue to build the market for public transport and attract more passengers we are focused on providing a proposition that meets and exceeds the expectations and needs of our current and potential customers. This means ensuring that we deliver a reliable and accessible service right across our network. Creating the conditions for these to be met will continue to be a priority for us alongside government, which will also enable growth and transformational regeneration across our route

- 2) The action required to achieve Welsh Government targets for modal shift to these modes, and behaviour change

West Coast Partnership supports the vision and ambitions outlined in *Llwybr Newydd – A New Wales Transport Strategy* - for an accessible, sustainable transport system which supports people and communities, is good for the environment, helps to drive economic growth and will contribute to the creation of great places to live and visit. We welcome the focus on partnership working to deliver that strategy and the commitment by Welsh Government to strengthen engagement with commercial transport operators who serve Wales.

We believe that the government can continue to help facilitate collaboration between transport operating companies across Wales which will be essential to help deliver a more integrated public transport services and is an essential requirement for the modal shift and behaviour change required. In addition to this, sustained and targeted investment will help create the conditions for a safe, reliable and integrated

rail network making it easier for people to access public transport in a way that meets their needs and requirements.

In 2023 Avanti West Coast will begin the rollout of its new fleet of Hitachi trains. The new fleet will be a mix of ten seven-carriage electric trains and 13 five-carriage bi-mode trains, with the ability to switch seamlessly between electric and diesel power. The electric trains (Class 807) will operate between London, the West Midlands and Liverpool while the bi-mode version (Class 805) will be focused on the London to North Wales route. Crucially the introduction of the fleet and the phasing out of the Voyager trains which currently serve our North Wales route will lead to a 61 percent reduction in carbon emissions.

- 3) Views on proposals for bus and rail reform – including UK Government plans to reform the rail industry, and Welsh Governments plans for regulation of bus services / the Bus White Paper

West Coast Partnership welcome reform that benefits customers. As much of the detail on reform is still to be decided, we want to work closely with all parties to ensure the customer is at the heart of the changes that will be made. We are keen to understand further how the introduction of Great British Railways will impact on private sector operators.

West Coast Partnership will deliver many improvements for customers and communities along the West Coast Mainline over the coming years and we're committed to making rail travel sustainable through delivering on the commitments in Our Responsible Plan. As part of this commitment, we look forward to continuing our work with Transport for Wales, the Welsh Government and other stakeholders to build on our achievements to date and will work with all partners to collaboratively promote and develop rail as we look to build back better beyond the pandemic.

Agenda Item 5.3

Vaughan Gething AS/MS
Gweinidog yr Economi
Minister for Economy



Llywodraeth Cymru
Welsh Government

Our ref: DC-VG-00424-22

Russell George MS
Chair, the Cross Party Group on Medical Research

13 June 2022

Dear Russell

Thank you for your letter following the meeting of the Cross-Party Group on Medical Research on 27 April and for providing further questions, which are answered below.

Assurance that the Input-Output table will be made available for researchers to utilise in future studies.

High-quality, detailed and timely economic statistics are needed to support policy making in Wales and across the UK. This is particularly important given that the increased devolution of powers, EU exit and Covid-19 are changing the economic structure and linkages between different regions.

Supply Use Tables (SUT) are the backbone of National Accounts and bring together all available output, input, gross and value added, income and expenditure data in a consistent framework, presenting accounts of an area's economic activity and playing an important role in the quality of national accounts. Input Output Tables (IOTs) are derived from the SUT and facilitate estimation of impact assessments and economic models, which can be used to analyse the effects of national policies.

Cardiff University published analytical IOTs for Wales in 2007. Due to the age of this data and uncertainties around its validity, these statistics are no longer considered fit for purpose.

That is why the Minister for Finance recently approved up to £1.05m over the next three years for the improvement of Welsh economic statistics by establishing an in-house program of work to develop Input Output Tables for Wales.

Developing in-house IOTs will give Welsh Government greater control, influence and leadership over the development of this work, as well as the opportunity to develop in-house expertise. We plan to work closely with Cardiff University experts on this

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work program and we will consult with Welsh Government colleagues as well as external organisations to understand the user need for these statistics.

To improve the availability and quality of data required for SUTs and IOTs, we will also need to boost funds to existing surveys where the sample size for Wales is low.

However, development of IOTs is not a quick task. Due to the technical nature of the work, the need to collect additional data, and the time lag associated with these surveys, it is unlikely that IOTs would be published until 2024-25, although experimental data may be available earlier.

Commitment to write to Russell George MS as Chair of the CPG to draw upon the Group's insight and expertise to contribute to the consultation on its new cross-portfolio Innovation strategy and to provide a timetable concerning publication of the draft strategy for consultation.

We are currently working with Plaid Cymru Designated Members, in line with the cooperation agreement commitment to jointly develop a new Innovation Strategy. It is important that we complete our engagement and involvement activities and comply with the Co-operation Agreement and Assembly timetable to ensure a full cross governmental commitment on the best way forward.

Publication of a draft strategy for consultation is planned for this summer. I have asked my Innovation officials to contact you when we issue the draft for consultation. I hope to have a final strategy in place before the end of the year.

Whether the new strategy will come with a commitment to increased Welsh Government spending on medical research infrastructure

Health and Care Research Wales has secured a further recurrent funding agreement for 2022/23 of £5 million from the Minister for Health and Social Services, increasing its overall budget to £47m/annum.

This will support the Covid Evidence Centre to cover more general (non-covid) policy areas; implementation of the UK Strategy for Clinical Research to ensure the NHS becomes people-centred and digitally enabled its approach to research; establishing a Health and Care Research Wales faculty initiative, supporting research career pathways and developing new personal award schemes to address gaps in current pathways in Wales; Implementation of the Wales cancer research strategy, and new investments in social care research and development, to address traditionally low levels of research capacity.

More detailed briefing on the scope and content of meetings with the UK Government at which the Minister lobbied on behalf of research in Wales

While the content of meetings between Welsh Government Ministers and officials with their counterparts in UK Government and the devolved administrations remains sensitive and often commercially confidential, I can assure you that every opportunity is taken to promote Wales and work towards ensuring the best possible outcomes for our ambitions for the economy and people of Wales.

Lack of support for developing surgical innovation and details of Welsh Government support available to individuals to innovate in a clinical setting.

A range of Welsh government funded support platforms and interventions exist as part of our wider health and care innovation ecosystem, to support and develop innovation.

Our three main initiatives are (web links and descriptions provided below)

- The Life Sciences Hub Wales
- Accelerate Wales
- AgorIP

The [Life Sciences Hub Wales | Life Sciences \(lshubwales.com\)](https://lshubwales.com) exists to help transform the health and economic wellbeing of the nation through:

1. Accelerating the development and adoption of innovative solutions that support the health and social care needs of Wales.
2. Partnering with industry to advance economic development across the life sciences sector in Wales, driving business growth and creating jobs.

To help make this happen we support health and social care colleagues across Wales to understand the challenges and pressures an organisation may face. Once identified, we work with industry to source and support the development of innovative solutions to respond to these challenges.

[Accelerate Wales | Life Sciences \(lshubwales.com\)](https://lshubwales.com) is co-funded by the European Regional Development Fund, the Welsh European Funding Office, Welsh Government's Health and Social Services group, universities, Life Sciences Hub Wales and NHS Wales health boards.

Accelerate helps innovators in Wales to translate their ideas into solutions, enabling them to be adopted in health and care.

Accelerate is led by Life Sciences Hub Wales, in partnership with [Cardiff University](https://www.cardiff.ac.uk) (CIA), [Swansea University](https://www.swansea.ac.uk) (HTC) and [University of Wales Trinity Saint David](https://www.trinity.ac.uk) (ATiC). Rather than providing funding or grants, this programme offers SME's and Enterprises in Wales the opportunity to tap into academic expertise, and the latest facilities needed by innovators and entrepreneurs to realise their ideas.

Accelerate can:

- Identify research and development collaborations.
- Connect this to experts in health technology, user experience, and clinical engagement.
- Help navigate the life sciences support ecosystem.

[AgorIP](#) is a new approach to innovation which can help bring ideas and innovation to life.

Thanks to EU and Welsh Government support, AgorIP can help you realise the potential of your idea, product or research. Our team of experts are here to help you take your “IP” to the marketplace and help make it a commercial success.

From a Business and Economy perspective, the route into Welsh Government support for an individual with a business idea is via [Business Wales \(gov.wales\)](#), which will consider a referral to Innovation or Entrepreneurship teams or other services, as most appropriate.

In terms of the support for health-related businesses, over the life of the current EU-funded SMART Cymru and our COVID RD&I schemes, Welsh Government has supported 89 businesses to deliver 123 projects, with total grant support of £9,012,404 and total project costs of £16,745,404.

Yours sincerely,



Vaughan Gething AS/MS
Gweinidog yr Economi
Minister for Economy

Cc.
Clerk, Health and Social Care Committee
Chair and Clerk, Children, Young People and Education Committee
Chair and Clerk, Climate Change, Environment, and Infrastructure Committee
Chair and Clerk, Economy, Trade and Rural Affairs Committee
Altaf Hussein MS

Agenda Item 5.4

Rebecca Evans AS/MS
Y Gweinidog Cyllid a Llywodraeth Leol
Minister for Finance and Local Government



Llywodraeth Cymru
Welsh Government

Eich cyf/Your ref
Ein cyf/Our ref

Llyr Gruffydd MS
Chair
Climate Change, Environment and Infrastructure
Senedd Cymru

SeneddClimate@senedd.wales

15 June 2022

Dear Chair

Outcome of the Interministerial Group meeting for Housing, Communities & Local Government

In accordance with the inter-institutional relations agreement, I can report that the Minister for Climate Change and I represented the Welsh Government at the inaugural meeting of the Interministerial Group (IMG) for Housing, Communities and Local Government on 24 May 2022.

Cabinet Secretary for Social Justice, Housing and Local Government, Shona Robison MSP and the Minister for Social Security and Local Government, Ben Macpherson MSP attended for the Scottish Government. Minister for Communities, Deirdre Hargey MLA and the Minister of Finance, Conor Murphy MLA represented the Northern Ireland Executive. Rt Hon Michael Gove, Secretary of State for Levelling Up and Minister for Intergovernmental Relations chaired the virtual meeting. He was accompanied by the Minister for Levelling Up, the Constitution and the Union, Neil O'Brien MP; and the Minister for Building Safety and Fire, Lord Greenhalgh.

The group discussed their future ways of working, based on the agreed outcomes of the Review of Intergovernmental Relations, agreed to meet quarterly and I confirmed the Welsh Government would host the next meeting.

Building Safety was the substantive item on the agenda and the group recognised that it is a shared issue affecting all governments around a joint aim to hold industry accountable and protect residents. Given the broad similarities across systems the Minister for Climate Change reinforced the need for better joint working on the reserved aspects of building safety, including on insurance and lending. She highlighted previously expressed concerns about the need for the Welsh Government's inclusion in industry talks taking place between

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the UKG and property developers to get their agreement to fund and fix all buildings over 11 metres that they have played a role in developing.

Secretariat officials will now work on a four nations basis to agree the focus and content of the next meeting to be held in the autumn.

Further information on what was discussed during the meeting can be found [here](#).

Yours sincerely

A handwritten signature in black ink that reads "Rebecca Evans." The signature is written in a cursive, flowing style.

Rebecca Evans AS/MS
Minister for Finance and Local Government

Open Letter to the First Minister of Wales June 2022

Wales needs access to environmental justice

Dear First Minister,

In June 2021, the Senedd declared a nature emergency. In response, the Welsh Government promised to bring forward legislation to establish statutory targets for nature's recovery, alongside an independent body to hold public authorities to account on their environmental commitments. Almost a year on, there is no clarity on when this will be done. We, the undersigned, call on the Welsh Government to bring forward these important new laws, for the people and wildlife of Wales, without further delay.

The Welsh Government's welcome commitment to a new environmental watchdog was first made in 2018 and has often been repeated, but is yet to be realised. When the UK was a member of the EU, the oversight and enforcement provided by European institutions protected our environment and enabled citizens to raise complaints, free of charge. This often led to investigation and court action, including on air quality and nature protection.

Replacement arrangements are now in place elsewhere in the UK, in the shape of Environmental Standards Scotland and The Office for Environmental Protection (which will enforce environmental law in Northern Ireland and England). Both have been legally vested, put teams in place, consulted on strategies and provide a clear route for people to raise concerns if they consider a public authority is failing to comply with or implement environmental law. Access to environmental justice – an international right – is supported by these processes.

In Wales, while there are temporary arrangements in place, there are no legal powers, no public strategy and no easily navigable (or even, easy to find) website. Still, the first annual report published by the Interim Environmental Protection Assessor for Wales

on 1st June demonstrates that there is concern about how our environmental laws are being used.

Wales can ill afford to fall behind in matters of environmental protection: one in six of our species is at risk of being lost from Wales, and only a fraction of our best nature sites on land and at sea are reported to be in good condition. Over 1600 people die early each year due to air pollution. The continued delay in passing laws to protect and improve our environment undermines people's right to environmental justice and is diminishing the reputation of the Welsh Government as a world leader on sustainable development.

Clean air, clean water and thriving nature are central to people's health and well-being. Wales' environment and its citizens deserve environmental justice – for this, we need robust legislation to drive recovery, as well as the tools to hold government to account, so that current and future generations benefit from a healthy environment.

Yours sincerely,

Roger Thomas	Chair of Wales Environment Link
Joseph Carter	Chair of Healthy Air Cymru / Head of Asthma + Lung UK Cymru
Alun Pritchard	Director of RSPB Cymru
Shaun Spiers	Chair of Greener UK
Rachel Sharp	Director of Wildlife Trusts Wales
Anne Meikle	Director of WWF Cymru
Chris Mills	Chair of Afonydd Cymru
Jason Reeves	Head of Policy at the Chartered Institute for Ecology and Environmental Management (CIEEM)
Angela Charlton	Director of Ramblers Cymru
Kit Stoner	Chief Executive of Bat Conservation Trust
John Harold	Director, Snowdonia Society
Nicola Hutchinson	Director of Conservation for Plantlife (Cymru).
Haf Elgar	Vice Chair of Healthy Air Cymru/ Director of Friends of the Earth Cymru
Ruth Billingham	Head of Campaigns and Public Affairs at Living Streets Cymru

Lowri Jackson	Head of Policy and Campaigns at the Royal College of Physicians Wales
Christine Boston	Director of Sustrans Cymru
Gwenda Owen	Engagement Officer at Cycling UK Cymru
Angela Charlton	Director of Ramblers Cymru
Gareth Cunningham	Head of Conservation Wales at Marine Conservation Society
Natalie Buttriss	Director of Coed Cadw Woodland Trust Wales

Supported by all WEL members



Wales Environment Link (WEL) is a network of environmental, countryside and heritage Non-Governmental Organisations in Wales. WEL is a respected intermediary body connecting the government and the environmental NGO sector. Our vision is a thriving Welsh environment for future generations.

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Julie James AS/MS
Y Gweinidog Newid Hinsawdd
Minister for Climate Change

Llywodraeth Cymru
Welsh Government

Your ref
Our ref: MA-LW-1678-22

Chair
Climate Change and Environment Infrastructure Committee
SeneddClimate@senedd.wales

22 June 2022

Dear Chair,

I'm writing to draw your attention to the subordinate legislation, which was laid before the Senedd yesterday, 21 June. If passed by the Senedd, it will introduce a default urban speed limit of 20mph throughout Wales in 2023. I have attached links to the legislation and the associated Regulatory Impact Assessment (RIA) and Explanatory Memorandum online below.

[Senedd Laid Documents](#)

I also wanted to set out some further matters which have been taken into account when considering the economic dis-benefits detailed in the RIA.

The assessment of introducing a Wales-wide default 20 mph speed limit must be considered in the context of the multi-decadal professional debate over the valuation of journey time savings. Although there are technical aspects of this debate, in the context of Welsh Government priorities to address climate change and achieve mode shift away from private vehicles to more sustainable modes of travel, the fundamental issue is that traveller time savings may either support or undermine those Welsh Government priorities, depending on who the time savings accrue to.

If drivers save time, this can increase car use and with it more vehicle mileage, carbon, pollution, congestion road danger and ill-health from sedentary lifestyles. This runs contrary to top-level Welsh Government objectives for climate, modal shift, air quality and social well-being. Under these circumstances it would be perverse to consider these time savings as a benefit without fully accounting for these disbenefits, many of which are not amenable to full quantification.

Conversely, if public transport users, walkers or cyclists save time, this tends to reduce vehicle use and concomitant carbon emissions, toxic air pollution, congestion and accidents whilst at the same time improving e health through more active travel. In these cases, where the time savings support Welsh Government top-line objectives, the time savings benefits are supplemented by these wider benefits, which again cannot be fully quantified.

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Furthermore, as noted above, academic debate has exposed uncertainty about the value that should be attached to small time savings, particularly where these small time savings accrue to leisure journeys of short duration in uncongested conditions. Some have argued that in such circumstances the value could be very low or even zero (indeed, in congested conditions, the proposed reduction in speed limits could in fact have little or no impact on journey times). On the other hand, the RIA shows that the aggregate benefit from the policy will be positive in respect of accident reductions and the associated health benefits.

This uncertainty is one of the reasons Welsh Transport Appraisal Guidance (WeITAG) is under revision and has been re-drafted to require the elements of value-for-money assessments that derive from journey time changes to be shown separately, so that decision-makers can take a view as to the relevance and validity of the journey-time element. The RIA of the nationwide default 20 mph policy has followed this guidance and shows that, excluding journey time savings, the 20mph policy provides an NPV of £1.9 million.

Furthermore, recent revision of the UK Treasury Green Book has recognised that in order for expenditure on policies and projects to be value-for-money, it must support government aims and objectives. As a result of this revision, the Welsh Government Chief Economist has issued an advisory note 'Aligning the Green Book with Welsh Government Values: Transport', which states that: 'A project can only be shown to deliver value for money if it is consistent with the Welsh Government's strategic objectives and values.'

Our assessment is that, in consideration of a Welsh Government policy that seeks to prevent vehicles travelling fast down residential roads for reasons ranging across climate change, modal shift, road safety and public health, a balanced judgement is needed. This should take account of the uncertainty about the value of small time savings on short journeys and of the wide range of benefits associated with reducing vehicle speeds, many of which it has not been possible to fully quantify.

On this basis, Ministers judge that the benefits of the policy will outweigh the costs and disbenefits.

Yours sincerely



Julie James AS/MS
Y Gweinidog Newid Hinsawdd
Minister for Climate Change

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