FCC welcomes the opportunity to contribute to this consultation. FCC works regularly with NRW on a range of issues across departments and wishes to raise the following issues/points/concerns.

- FCC recognises there is still work to be done to achieve internal cohesiveness between the three legacy bodies. The importance of local contacts are invaluable in all aspects of working with NRW, whether this is from the value of local officers on the ground to enable projects to be realised to easily accessing advice from biodiversity specialists. It is currently unclear how all the different sections/departments within NRW are arranged and FCC would welcome the final structures with contacts (not just a general email address, direct line phone numbers are particularly time consuming to obtain).

- Partnership Working
There is a very varied approach dependant on the officer involved and their background within the organisation. All NRW Officers need to have recognition of the full range of NRW’s responsibilities and corporate priorities, rather than just their regulatory function and particularly with the management of their own land.
• **NRW licensing/consents**
NRW licences are mostly turned around within set times, however there are some issues with NRW consents where internal consultations can be overly bureaucratic with an inflexible approach to practical delivery and can have an effect on project timetables.
Section 15 management agreements are valued but there needs commitment to improve officer workload to turn around agreements in a timely manner.

• **Grants – Joint Working Partnership and Competitive Fund.**
FCC welcomed the forward planning associated with these grant schemes and the valued advice from the grant officers involved. However, it is now the new financial year and no formal offer of grant aid has been provided.

• **Consultations (Planning)**
There needs to be greater clarity and consistency particularly with regards ecological comments, so that Planners and Applicants can easily understand what the issues are if any. Similarly covering ecological issues is important so that procedures don’t vary between officers/areas.
The NRW mission statement often over-rides the actual response which can get overlooked especially by applicants if it is in the final paragraph and there is a previous “no objection in principle” paragraph. Ideally the first line of any letter needs to refer to consideration of the application and conclusion; whether this is an objection for given reasons, no objection subject to conditions or cannot formulate an opinion because need further information with specific requests for this information.
FCC Officers would be happy to assist and also with the drafting of relevant guidance.