

National Assembly for Wales
Environment and Sustainability Committee
NRW 2015 – 68
Natural Resources Wales – Annual Scrutiny 2015
Response from Alliance for National Parks Cymru



**EVIDENCE TO
ENVIRONMENT AND SUSTAINABILITY COMMITTEE'S
ANNUAL SCRUTINY OF NATURAL RESOURCES WALES**

1. The Alliance for National Parks Cymru welcomes the opportunity to submit evidence to the Committee. Our interest in the role of Natural Resources Wales stems from our concern for the future of Wales' landscapes and seascapes, especially those areas that have been recognised nationally for their outstanding natural beauty and cultural heritage and for the opportunities they provide for recreation and enjoyment.
2. We consider that it is particularly apposite to consider NRW's role in relation to these matters at this time, given the Welsh Government's emerging agenda in the Future Generations Bill, the forthcoming Environment Bill, which will introduce a whole new approach to natural resource management [including a specific role for NRW], and the Review of Designated Landscapes that is currently in progress.
3. We consider that NRW should be the champion of all matters relating to landscapes and seascapes, in particular the European Landscape Convention and National Parks and AONBs for which it has very specific statutory duties.
4. We are concerned that NRW appears to pay scant attention, at least overtly, to landscapes and seascapes in its current corporate plan and business plan. In stating its purpose of ensuring *"...that the environment and natural resources of Wales are sustainably maintained, sustainably enhanced and sustainably used, now and in the future"*, NRW emphasises that what it does should be **"Good for the environment: ecosystems are resilient and secured for the future, wildlife and landscape are enhanced, and the use of our natural resources is carefully managed"** [page 5].
5. However, in indicating its wide range of role and responsibilities NRW cites its role [page 6] as *"principle adviser to Welsh Government, and adviser to industry and the wider public and*

voluntary sector, and communicator about issues relating to the environment and its natural resources". Although there is mention

- of its role as a designator of, amongst other things, National Parks and Areas of Outstanding Natural Beauty [page 6 of Corporate Plan]
- of the European Landscape Convention as an example of issues to be considered [see Corporate Plan page 21]
- of contributing to Welsh Government protected landscape policy including the review of their governance [business Plan 2014-15 page 17]

there does not seem to be any overt recognition, for example through a major work stream, of the importance of landscapes and seascapes in Wales, especially of the 25% of the land area designated as National Park and AONB and of the need to carry forward the leadership role performed by the Countryside Council for Wales. The Section in the corporate plan headed "Good Environment" mentions the need to "*care for our protected landscapes, including AONBs, National Parks, and historic landscapes*" as a challenge and opportunity [page 19 Corporate Plan], but does not appear to indicate any intention to take action.

6. Given the importance of Wales' landscapes and seascapes it seems pertinent therefore for the Committee to ask NRW in relation to:-
 - a) **the European Landscape Convention** - if and how it intends to take the lead on delivering the approach that it is set out in the Convention ; for example how does their work on the State of Natural Resources embrace landscapes and seascapes and has their work in ensuring that legislation [Heritage Bill, Planning Bill, Future Generations Bill] supports an integrated approach to natural resource planning similarly ensured that such an approach to landscapes and seascapes, especially those designated nationally, are supported
 - b) **the Environment Bill** - how it will be promoting the interests of landscapes and seascapes through the forthcoming Bill, especially as they are not now considered by the Welsh Government to be within the definition of natural resources.
 - c) **Duties towards Designated landscapes** - in the light of the Review of the Governance of Designated Landscapes that is underway it is especially important to understand what steps it is taking to fulfil its duties towards designated landscapes inherited from CCW.
 - d) **Sustainable management of designated landscapes** – in the light of
 - the new role in relation to natural resource management that the Environment Bill will give it, and
 - the duties of public bodies it will shortly be required to fulfil under the Well-being of Future Generations Act

how does NRW sees itself performing the leadership role implied by its duties towards designated landscapes? If so, what form does or might the leadership role take? For example, will it be setting Well-being objectives for designated landscapes and its duties towards them?

- e) **Management plans for designated landscapes** – given that management plans for designated landscapes cover 25% of Wales, that they already adopt an integrated approach and are well placed to incorporate wider aspects of natural resource management, what steps is NRW taking to ensure that these plans provide the framework for natural resource planning and become in effect the natural resource plan for their area?
- f) **Planning Bill** – in view of the powers Ministers have taken, against all evidence, to enable them to transfer the development control function of NPAs to Joint Planning Boards, what advice as to the benefits of NPAs being planning authorities and controlling development themselves, if any, has NRW given the Minister in coming to his decision to take the powers.
- g) **Planning casework**– One of key elements of the business case for establishing NRW was that it could provide ‘joined up advice’ on diverse matters such as landscape, recreation, wildlife, water quality and pollution. A number of points of concern arise from this aim of ‘joined up advice’:
- It is not clear how NRW ensures that diversity of professional opinion on these topics within the organisation is properly reflected and evaluated within the decision making process and made transparent. We feel that this is very important not least because there is a public interest in such diversity of opinion. What steps does it take to be transparent in that process of giving a single view on a whole number of matters?
 - It is also not clear how NRW applies its statutory duties towards developments affecting the protected landscapes of Wales [National Parks and AONBs]. There is a perception that it shows little concern for such situations, especially when giving ‘call-in’ advice to Ministers. Its processes appear to be neither clear nor transparent. In relation to these special areas, what criteria does it employ for involvement in individual cases and what, if anything, does it intend to do in terms of improving the openness and transparency of its processes?

For further information please contact:

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