

Cynulliad Cenedlaethol Cymru
Y Pwyllgor Amgylchedd a Chynaliadwyedd
NRW 2015 – 54
Cyfoeth Naturiol Cymru – Craffu Cyffredinol 2015
Ymateb gan Margaret and Iain Aitken (Saesneg Yn Unig)

9th April 2015

Alun Ffred Jones AM, Chair
c/o The Committee Clerk
Environment and Sustainability Committee
National Assembly for Wales
Cardiff Bay
CF99 1NA

Annual Scrutiny of Natural Resources Wales

Thank you for this opportunity to comment. We do have concerns, particularly regarding the operation of NRW in their role as statutory consultee for Welsh planning applications.

1. It seems clear that the central purpose of NRW, not least as reflected in public statements by the chairman, Peter Matthews, is the promotion of the exploitation of Wales's natural resources and creation of a 'new economic model'¹. In the pursuit of this objective there is the danger that the fact that rural Wales is a great deal more than a fund of resources to be tapped is overlooked. For a great many of us rural Wales is our home, where we have chosen to live, to work, to raise families, to take our holidays and walk or ride the hills, and we love the landscapes around us. For those of us involved in any form of tourism the rural landscapes are also our bread and butter, critical to our livelihoods. A body which exists to promote development has a clear conflict of interest when it also responsible for safeguarding landscape and biodiversity. The existing rural 'economic model', containing many diverse and creative enterprises, must not be jeopardised by insensitive development or an overarching agenda for development at any cost. Those of us living in rural areas may not even agree that we need a 'new economic model' or that our interests should be sacrificed to someone else's 'new economic model'. Exploitation of natural resources which does not give full consideration to needs of rural communities and existing businesses, including protection of landscapes, will cause untold damage to rural life and the rural economy.
2. Linked to the above point is the diminution of NRW's role as statutory consultee for Welsh planning applications in relation to landscape. Worse, there seems to be a lack of clarity which is allowing councils to believe that a lack of objection from NRW on landscape grounds to an application is sufficient for the council to assume that landscape impacts are acceptable. This confusion is not helped when NRW fail to state clearly the limits of the advice given or the precise remit to which they are working. NRW advice on Powys application P/2014/0860 exemplifies the potential for confusion.
3. There are councils which do not have a landscape officer to take over the role of statutory consultee on landscape so this retreat from an active landscape role in the planning system on NRW's part is creating a

¹ <http://www.utilityweek.co.uk/news/interview-peter-matthewschairman-natural-resources-wales/1027682#.VSbCDNh0yUK>

democratic deficit and a lack of attention to landscape issues. Clarity is needed for councils to understand the way in which they must adapt their own structures and practices to fill the gap NRW has created. At the same time NRW could be more active in promoting the consistent use of Landmap data, and application of Landmap guidelines, to ensure consistency of decision making and evaluation of landscape impacts across Wales.

4. There is a further source of confusion concerning NRW's role as statutory consultee on ecological matters. Where councils have their own well qualified and experienced ecologists it is not necessarily helpful to ecological interests to have two sources of potentially conflicting advice. There needs to be far greater clarity as to where the council's responsibility ends and NRW's begins. I have only just now attended a planning committee meeting in Powys where not only the planning committee but also all the officers appeared to have no understanding of the respective responsibilities of NRW and the council's own ecologist.
5. There is great concern in Powys about the deterioration in the water quality of our rivers. To some extent this can be laid at the door of NRW who have a policy of not addressing cumulative issues when smaller scale intensive agricultural units are applied for. These, particularly in the form of chicken sheds, have been applied for in great number in Powys, and so with considerable cumulative impact, and there is now a serious problem with water contamination (soluble reactive phosphates) both within Powys and downstream on the Wye. It is disappointing that a government organisation which must have inherited from its predecessor bodies a great deal of scientific expertise and experience has allowed a situation such as this to arise or to worsen under its watch. It may again be that a policy of promoting development is at the root of this problem, and that the impacts of development have been insufficiently assessed and monitored.
6. Finally, I am aware that the issue of deterioration of river water quality was known as far back as 2012. Radnorshire Wildlife Trust, and I doubt they were alone in raising this concern, were even then advocating greater controls on intensive agricultural developments. However, NRW, despite having effectively been in operation for a couple of years, has failed to respond to these concerns and react effectively to prevent the worsening of the situation.

This is our personal response to the consultation. We do not object to publication.

Yours sincerely

Margaret and Iain Aitken