

10th April 2015

Annual Scrutiny of Natural Resources Wales

We would like to add some further concerns, having had the opportunity to look at the remit letters for NRW during its years of operation.

1. Extract from 2013/14 NRW remit letter: *“...we look forward to Natural Resources Wales delivering a streamlined programme of work which reflects our Government priorities on living sustainably, reducing poverty, and improving equality. It will help improve the lives of the people of Wales...working for sustainable development with healthy people enjoying a better quality of life in safe and more cohesive communities...”*
2. The above intentions are worthy but are perhaps somewhat distant from what should be the core priorities of a body taking on the remits of the Countryside Council for Wales (CCW), the Environment Agency and the Forestry Commission. Attention to these inherited priorities might indeed result in achievement of these intentions.
3. **CCW:** The stated aims and policies of this organisation are clearly set out on the CCW website and the role of the organisation in responding to planning applications set out with great clarity and precision in ‘Countryside Council for Wales: A Service Statement for Planning and Development’. In summary, CCW state on their website: *“CCW champions the environment and landscapes of Wales and its coastal waters as sources of natural and cultural riches, as a foundation for economic and social activity, and as a place for leisure and learning activities. We aim to make the environment a valued part of everyone’s life in Wales.”*
4. NRW seem to be in retreat from either this commitment to championing landscapes, or recognising their importance ‘for economic and social activity’, and seem, by reference to their own Service Statement, to have contracted the role formerly played by CCCW as statutory consultee. This is nothing short of tragic. Wales has outstanding landscapes which draw visitors from across the world, and which are a large part of what attracts people to remain in rural Wales to live, or draws them to move to rural Wales. The rural economy does indeed depend very significantly on protection of landscapes, and this was recognised by CCW. Managed sensitively, development within Wales’s outstanding landscapes can be reconciled with the aim of protecting the high quality of rural landscapes. However, for this to happen requires an agency with understanding of the importance of landscapes and a commitment to their protection and an active role as consultee to the planning process.
5. **Environment Agency Wales'** role included: reducing industry’s impacts on the environment, enforcing pollution legislation and reducing the harm caused by flooding and pollution incidents. It also oversaw the management of waste, water resources and freshwater fisheries; cleaning up rivers, coastal waters and contaminated land and improving wildlife habitats.

6. **Forestry commission:** responsible for the protection and expansion of forests and woodlands. Also responsible for scientific research, promotion of outdoor activities within its holdings and protecting and improving biodiversity around woodlands.
7. The effective continuation of the roles of these two organisations requires retention of staff with the appropriate scientific qualifications to understand the interrelationships between developments, both individually and in aggregate, and consequences for water quality, contamination by airborne pollutants, impacts on biodiversity etc. It also requires that the expert scientific opinions of qualified staff are given their proper weight in decision making. There is some concern that this is not always the case.
8. In any case, the desired outcomes of NRW's work, as stated in remit letter 2013/14, are not always matched by the realities on the ground in rural Wales. To take one example, the removal from NRW of an effective consultee role in the approval of smaller wind development applications outside designated landscapes, has caused huge disruption and upset in rural communities, with one person's financial interest being all too frequently allowed to eclipse his neighbours' rights to quiet enjoyment of their homes and gardens and landscapes. Not to mention the widespread complaints about noise impacts on sleep and health, the damage to the tourism economy and the likelihood of substantial damage to the rich wildlife of rural Wales. In this respect, in rural areas our lives are not improved by NRW's activities, quite the reverse, and our communities are split by the divisiveness of these improperly regulated applications and our environment is degraded.
9. The same remit letter includes in Annex 1 as a priority for 2013/14: "...facilitating new business opportunities, including tourism..." Tourism in rural Wales is highly dependent on our high quality landscapes. Protection of these by way of ensuring the sensitivity of development is essential to the achievement of this priority. Sadly it appears that protections, by way of an active role as statutory consultee on landscape issues in planning applications, which were offered by Countryside Council for Wales are not consistently offered by Natural Resources Wales.
10. The theme which emerges most strongly from a reading of the remit letters is the extent of Welsh Government control of NRW's direction and activities and the consequent lack of independence afforded to an organisation which has as one of its key functions operating the necessary checks and balances on development. To perform an effective watchdog role, NRW must be free of heavy handed controls and political direction. It is already evident in rural Wales that development decisions are being made which have caused genuine distress and upset and are beginning to erode the key attractions of living in a quiet and beautiful rural area.
11. We would wish to see that part of NRW responsible for comment on development applications wholly independent of government agendas so that it is indeed free to offer the advice which is necessary to protect our natural environment.

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

Yours sincerely

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