National Assembly for Wales
Environment and Sustainability Committee
NRW 2015 – 96
Natural Resources Wales – Annual Scrutiny 2015
Response from Pembrokeshire County Council

April 2015

Pembrokeshire County Council (PCC) works with Natural Resources Wales across a number of functions, including Planning and Development, public protection, waste planning/ waste management and nature conservation / biodiversity. PCC welcomes the opportunity to respond to the Environment and Sustainability Committee's examination into the performance of Natural Resources Wales (NRW). As a rural county with an extensive coastline Pembrokeshire's environmental quality and its richness of biodiversity which provide the context for its economy – for agriculture / agricultural services, for tourism and maritime services, including the economic development surrounding the Haven Waterway.

The County Council works in partnership with Natural Resources Wales across a number of partnership programmes and plans, including the Single Integrated Plan for Pembrokeshire, the Pembrokeshire Biodiversity Partnership and the Relevant Authorities Groups for the Pembrokeshire Marine, Carmarthen Bay and Cardigan Bay Special Areas of Conservation.

The Authority enjoys good working relationships with NRW staff, including regular Planning liaison meetings and co-working through various partnership projects.

Within Pembrokeshire NRW officer(s) participate in the Pembrokeshire Environment Forum (NRW chair) (sub-group of the Pembrokeshire Single Integrated Plan), the Sustainable Agriculture Network for Pembrokeshire, the Pembrokeshire Biodiversity Partnership and in each of the Marine SAC Relevant Authorities' Groups pertaining to Pembrokeshire.

Good examples of joint working locally include recent Good Practice Guidance on Slurry lagoons, NRW ecosystems services work with First Milk to secure compliance with DCWW discharge consent at Merlins Bridge Works, the Pembrokeshire Bathing Waters Strategy and pivotal work in support the establishment and operation of the WG Nature Fund project on Ecosystems Banking.

The knowledge, expertise and understanding of NRW staff is to be commended, as is the commitment of staff to securing pragmatic and workable problem solving solutions to environmental issues.

PCC has concerns however with:

- continuing non availability of Site Condition Reports for Special Areas of Conservation,
- responses to Planning application consultations and
- the resourcing / management of resourcing for the various partnership projects.

<u>Site Condition Reports for Special Areas of Conservation</u>

NRW had committed to providing comprehensive site condition reports by end 2014, recognising that these were 'crucial in helping to focus future management actions that will contribute towards achieving favourable site conservation status for all European marine

sites'. In December 2014 the Chairs of the various SAC RAGs were advised by NRW that they would not be able to meet the target and, further that, notwithstanding good progress towards this end, there will be a considerable delay in producing these, attributed to competing priorities for officer time, including organisational changes associated with establishment of the new organisation and high levels of casework and non specified 'other priorities' and reference to diminishing resources. It is disappointing that no revised target has been offered, either in December 2014 or since.

Whilst PCC recognises the difficulties implicit in resource allocation and prioritisation the Authority would very much welcome a revised target for this work together with regular (say three monthly) reporting of progress to this crucial goal.

Planning Application Casework

In relation to planning application consultations PCC would welcome:

- Improved response rates and timeliness,
- Improved consistency in the advice given ,
- Improved capacity to respond to requests for pre-app/informal discussions,
- Consultation responses that better reflect the ecological information submitted.

Resourcing of Partnership projects

- PCC has longstanding and successful working relationships with NRW and its constituent predecessor bodies, with the previous partnership grants enabling significant outcomes for the environment over many years. The process for funding for 2015/2016 and beyond through the Joint Working Partnership Fund, for Pembrokeshire Biodiversity Partnership, European Marine Site Officers (Pembs Marine, Carmarthen Bay and Cardigan Bay SACs), has presented particular challenges throughout, including:
    - Conflicting information between the guidance notes and later advice from officers at NRW.
    - Changed amounts offered, with implications for associated match funding.
    - Uncertainties in relation to the timescales offered – 3 year versus one year programme .
    - Overheads at 7% (and what qualifies for overheads).
    - Short time scales for revisions to application forms to meet NRW requirements.
    - Risks to PCC and other partners arising from unconfirmed fundingprior to the beginning of the 2015/16 financial year.

  It is understood, informally, that funding for the SAC RAGs will not be routed through the JWP fund and will be for 1 year only, despite EMS officers being given to understand that funding would only be available through this fund and would provide a 3 year commitment.

  PCC has reservations that, in the transition from predecessor bodies to NRW, resourcing previously provided to the environment has been reduced, as for example for the Pembrokeshire Marine SAC RAG, notwithstanding that this is the SAC with the greatest commercial pressures on its environment and noting that despite

financial pressures on all partners that NRW is the only partner to reduce funding to the partnership. The role of the SAC RAG is crucial in seeking to secure favourable conservation status and improved water quality in the Haven Waterway alongside much needed economic growth in and around the Haven.

Once again PCC welcomes the opportunity to inform this important debate and would be willing to provide any further details at the committee's request.

PCC
10 April 2015