



Campaign for the Protection of Rural Wales

Brecon and Radnor Branch

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Committee Clerk,
Environment and Sustainability Committee,
National Assembly for Wales,
Cardiff Bay,
CF99 1NA

10th April 2015

Dear Madam/Sir

Natural Resources Wales – Annual Scrutiny 2015

The Campaign for the Protection of Rural Wales (CPRW) established in 1928 is Wales' foremost countryside Charity. Through its work as an environmental watchdog it aims to secure the protection and improvement of the rural landscape, environment and the well being of those living in the rural areas of Wales.

The Brecon and Radnor Branch of CPRW is very pleased to have the opportunity to set out our concerns about NRW. We have limited our response to a number of very basic general points because we wish to place maximum emphasis on the huge importance of these for the future of our countryside, particularly our biodiversity and landscapes, the public enjoyment of the countryside, and rural regeneration depending on a tourism that is based on walking, cycling and horse-riding in the Powys countryside.

1. Natural Resources to be exploited: Natural Resources to be protected and enhanced

“Natural resources Wales brings together the work of the Countryside Council for Wales, Environment Agency Wales and Forestry Commission Wales, as well as some functions of the Welsh Government. Our purpose is to ensure that the natural resources of Wales are sustainably maintained, used and enhanced, now and in the future”.

We regret that the word ‘protection’ does not come into this mission statement and, while NRW claims responsibility for how resources are managed in the future, it does not claim any responsibility for seeing that

natural resources are maintained and enhanced for the benefit of future generations of either people or natural species.

When NRW was formed by amalgamating the EA, Forestry Commission and CCW, we had grave doubts about how the new organisation would manage its comprehensive role. The very name 'Natural Resources Wales' embodies the problem. Are Welsh 'natural resources' assets to be exploited for development or are they natural species and landscapes to be preserved and enhanced for the sake of future generations? Clearly they are both and clearly the two sets of aspirations and activities frequently conflict. 'Sustainability' may be a comforting concept but, in many contexts, it is little more than a new de rigueur piece of emperor's clothing. To take an obvious example: how do you sustain the quality of a downstream aquatic environment for biodiversity when your presumption in favour of development leads to over-exploitation of resources and pollution by intensive agriculture upstream? These conflicts cannot be wished away and they are rarely resolved by 'mitigation' or 'compensation'.

In our view it is dangerous to have a single nation-wide organisation responsible for the two functions of development and conservation. Development attracts and creates financial wealth while conservation of natural species, habitats and landscapes costs money and often holds up development. We live in a politico-economic environment where public funds are ever more limited. In this climate, how can the function of protection and enhancement of natural species, habitats and landscapes possibly avoid becoming subservient to the drive for development?

B&R CPRW would like to see a clear division of functions with clear safeguards for the protection and conservation role of NRW.

2. NRW Personnel

Other responses have mentioned 'poachers and game keepers': in the NRW situation, the richer development arm (poacher) can blackmail the conservation arm (gamekeeper) with threat of job-loss. 6.1 of Development Planning Advice 2014 V4.0 says "in keeping with the main drivers for planning reform we are encouraging our staff to look for ways in which to support Welsh planning policy in the delivery of sustainable development"

We are aware of discontent among NRW staff who, under pressure not to stand in the way of particular developments, are not always able to exercise their professional judgement.

We are also concerned about the possible drain of scientific expertise among NRW staff and wonder if NRW always has the human resources necessary to adequately match their responsibility for natural resources. For example, we have been particularly troubled by decline in quality of Welsh rivers, increase in intensive poultry farming, and loss of peat soils in wind-farm landscapes.

B&R CPRW would like to see evidence that well-qualified experts are dealing with matters that require specialised scientific training.

B&R CPRW would like reassurance that qualified staff are able to express their views and exercise their professional judgement without censure (See <https://www.gov.uk/whistleblowing/overview> where 'damage to the environment' is a legitimate subject for whistle blowing).

3. NRW, LPAs and Planning Decisions

NRW is regarded as a very important statutory consultee. There are problems with this role.

Sometimes NRW does not respond at all. Responses that are made are inconsistent in quality, degree of detail and in which of NRW's areas of responsibility they actually address (landscape, biodiversity – and then which species, water quality, important PROWs etc.). Without over-burdening this document, by way of example, we ask you to compare the sparse and limited NRW response to P/2013/0702 67m wind turbine at Upper Farm, Dolau with the detailed and careful response to P/2014/1011 for a much smaller 35.4m wind turbine at Maesmedrisiol, Llanbrynmair.

NRW Development Planning Advice (15.9.14 V4.0), Section 1.4 describes the development applications requiring response, most of which relate to special designations, and 1.5 says NRW will rely on standard advice or LPAs to fulfil legal obligations. Thus NRW often declines to comment on any habitats or landscapes that are not designated or on impacts on natural species that do not have EPS status. Increasingly NRW responses have standard disclaimers directing the LPA to have regard to biodiversity and landscape issues. However LPAs often do not acknowledge this responsibility and the result is that the majority of our habitats and landscapes are not protected at all. NRW appears to have no mechanism for obtaining local knowledge and views from a well informed public.

B&R CPRW would like to see NRW make more careful, comprehensive and consistent responses to planning application which acknowledge the importance of landscape, habitats and biodiversity throughout Wales.

4. Public Rights of Way and Tourism

PROWs including National Trails and long-distance bridleways and cycle routes are of prime importance to Welsh residents and tourists. NRW, LPA Countryside Services Departments and National Trail Organisations all have some responsibility but none of these gives proper attention to preserving the quality of the landscape through which these routes pass. Since many of them cross local political boundaries, as a national organisation NRW should take a more active role.

B&R CPRW would like to see NRW protecting the landscape corridors of major rights of way and thus enhancing public enjoyment and rural regeneration through tourism.

5. Overview of Development

NRW personal may recall Iolo Williams' 'State of Nature' address to the Welsh Assembly on 22.5.13. NRW is the organisation entrusted with halting the distressing decline in habitats and species he described.

As a national organisation, NRW is in a prime position to have an overview of development and conservation issues in Wales. If NRW's interests are restricted to designated landscapes and habitats, there will be no national organisation to conserve and enhance natural resources outside these. And if these restricted interests are mirrored in the planning system, all the remaining landscape and habitat resources will suffer a mixture of neglect and unsympathetic development.

B&R CPRW would like to see NRW maintain data-bases of major types of development such as types of renewable energy (wind, solar, bio-digesters), intensive poultry farming, etc. to assess the impacts of these on Wales and use feed back on negative impacts to modify Welsh Government Policy.

B&R CPRW would like to see NRW develop over-all policies to address the decline in the 'State of Nature' in the whole of Wales.

We believe that NRW is involved in many individual positive initiatives and we would like to acknowledge these, however they are outweighed by negative factors. The public has lost confidence in the ability of NRW to defend our landscape and biodiversity and regards it with some cynicism as an agent in the progressive decline of our natural environment, more concerned with a corporate image than with public concerns. We hope it is not too late to rescue NRW from the predicament into which it has been lead by its contradictory aspirations.

Yours sincerely,

A handwritten signature in black ink that reads "Peter Seaman". The signature is written in a cursive, flowing style.

Peter Seaman MBE

Chair: Brecon and Radnor Branch.

Registered charity number 239899

