



Response to the Welsh Government Business Case for the Single Environment Body

January 2012

Parc Cenedlaethol Eryri
Snowdonia National Park

Parc Cenedlaethol
Arfordir Penfro
Pembrokeshire Coast
National Park

Parc Cenedlaethol
Bannau Brycheiniog

Brecon Beacons
National Park



BRECON BEACONS
NATIONAL PARK



Parc Cenedlaethol
Arfordir Penfro
Pembrokeshire Coast
National Park



PARC CENEDLAETHOL ERYRI
SNOWDONIA
NATIONAL PARK

Parciau Cenedlaethol Bannau Brycheiniog, Arfordir Penfro ac Eryri yn gweithio mewn partneriaeth Brecon Beacons, Pembrokeshire Coast, and Snowdonia National Parks. Working in Partnership.

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1. CONTEXT

- 1.1 On the 21st December 2011 the Deputy Clerk to the National Assembly for Wales Environment & Sustainability Committee invited the three National Park Authorities to provide a paper of written evidence and to send representatives from the Parks to participate in a panel discussion with the WLGA as part of a short inquiry to examine the Business Case for the Single Environmental Body (SEB).
- 1.2 We were advised that the terms of reference for the Committee's inquiry had not yet been agreed. This paper has been prepared on behalf of Brecon Beacons, Pembrokeshire Coast and Snowdonia National Park Authorities in the absence of the terms of reference.
- 1.3 National Parks Wales (NPW) represent the coming together of the three National Park Authorities (NPAs) in partnership to share good practice, to deliver efficiencies and to promote the role of National Parks (NPs) in delivering a living and sustainable environment.

2. SUMMARY OF PAPER

- 2.1 The National Parks Wales (NPW) welcomes the announcement by the Minister to establish a single environmental body (SEB) for Wales.
- 2.2 NPW do not question the methodology and the conclusions of the strategic business case.
- 2.3 NPW supports the desirability of having "...a new, integrated approach to managing the natural environment, joining up existing organisational strategies..." p7. The establishment of SEB should allow the Welsh Government (WG) to set a clearer focus in this area of its responsibility.
- 2.4 Ideally SEB should have been developed in response to a fully developed Natural Environment Framework (NEF) and the impression left is that SEB has been developed before there is a general understanding of what NEF is expected to deliver in terms of measurable outcomes.
- 2.5 The Business Case would benefit from practical examples to support statements such as there is "lack of coherence in environmental planning at both strategic and local level" leading to "detrimental impact (on) the delivery of Welsh Government policy and environmental improvements (as well as) impact on major economic development opportunities" p9
- 2.6 How SEB is set up, its core values and delivery mechanisms are real issues for NPAs. We very much hope that relevant partners will be actively consulted on how SEB is structured operationally. Unless this is done

properly there is a danger that the non-core work of the constituent authorities, which is significant to the work of NPAs such as access and cultural heritage, will be demoted by being part of a much larger organisation.

- 2.7 NPAs consider that they have an important role to play to ensure that SEB can successfully deliver the integrated strategic policy initiatives. At the local level NPAs can and does facilitate effective engagement with local communities, local land managers and land users.

3. NPW INVOLVEMENT IN THE BUSINESS CASE and NEF

- 3.1 NPW has been involved directly in discussions on the Natural Environment Framework (NEF) and SEB:

- ❖ As a consultee to A Living Wales: The Natural Environment Framework (NEF) process.
- ❖ Though involvement on the NEF/SEB reference group
- ❖ Through regular discussions with Welsh Government Officials and other stakeholders, including the October NPW Members Seminar hosted by the Brecon Beacons NPA which focused upon biodiversity and ecosystem services within Wales' National Parks.

The NPAs have also have indirect involvement in the SEB discussions through their associate membership of the WLGA.

4. METHODOLOGY

- 4.1 NPW do not question the methodology, including the qualifying criteria, scoring matrix, option ranking etc.

- 4.2 As far as risks are concerned the Business Case mentions "continuity of parent body" p12 but we do not believe that this is dealt with adequately. The establishment of a new body will have short term impact on its partners. Establishing a new body inevitably results in disruption and a drop in productive effort. However, the NPAs expect that SEB transitional period will be effectively managed so as to be mitigate and minimise any disruption to its partners.

- 4.3 We welcome the reference on p20 to the importance of "the maintenance and development of effective partnerships ... including those relating to planning decisions..."

- 4.4 The business case also deals with commercial and financial issues (sections 4 and 5) such as pension provisions, assets and liabilities,

transitional arrangements etc that lie outside our competence to comment upon.

5. THE CASE FOR CHANGE

- 5.1 NPW does not question the principle of establishing the SEB. The streamlining and integration of the service delivery afforded by this opportunity is to be welcomed.
- 5.2 The rationale and criteria for the review have been set out clearly and comprehensively in the business case.
- 5.3 NPW is not in a position to question the economic case and the ranking criteria adopted.
- 5.4 The aims of the SEB as presently drafted are laudable.
- 5.5 We support the view that “The change will give Wales first hand representation over the full breadth of the SEBs remit and therefore more influence” p31.
- 5.6 We do not question the assertion that the SEB will “enable better delivery of Welsh Ministers’ priorities and Wales’ needs...” p30. Some practical examples to back this up would be useful.
- 5.7 The Business Case states that “Combining bodies reduces duplication or triplication of activity...” p30. A clearer definition in the business case of instances of front line duplication on both the regulatory and non-statutory activity of the three constituent organisations would be useful. It is obvious that back-office efficiencies are possible through integration, the extent of which has been identified in the business case.
- 5.8 We endorse the view that Wales has to change the way it manages its natural resources. Biodiversity loss; climate change and the wasteful use of resources damages our ecosystem services and puts at risk our collective dependency upon them.
- 5.9 The strategic case contends that the regulatory framework is too fragmented, undermining efforts to protect the environment and efforts to sustainably manage and harness resources for sustainable development. Whilst the environmental regulatory framework is fragmented; it could be made to work through an integrated and sustainable ecosystems approach, such as that found within the National Park Management Plans (NPMP). The NEF/SEB proposals are of a greater scale of magnitude, yet they share similarities, they allow for the integration and development of a regulatory framework that is more “joined-up” and managed by a sole

organisation. Within the context of the National Parks we find that the NPMP represent a form of ecosystem services approach that is working. We believe that our experience with NPMP could be utilised elsewhere.

- 5.10 What remains unclear is what practical and measurable outcomes we can expect from SEB that will lead to improved outcomes for the environment and its citizens.

6. THE FUTURE

- 6.1 The SEB will change the way the current bodies interface with the NPAs and the way certain regulatory functions are administered. There is an opportunity here for SEB to consider whether some of its functions could be better delivered at the local level by its partners including the NPAs.
- 6.2 Organisational change alone will not ensure that loss of biodiversity is halted and the Business Case recognises that there are wider issues at stake here. This is to be welcomed. While the driving force behind the NEF has been the loss of biodiversity, the focus in the Business Case has been on consolidating the regulatory framework that protects ecosystem services. It is important that SEB does not lose sight of other non regulatory aspects the ecosystem services approach such as cultural heritage.
- 6.3 NPAs have a statutory duty to prepare National Park Management Plans (NPMPs) their implementation and existence are good examples of how to deliver the ecosystems approach in practice.
- 6.4 The SEB constituent bodies are key delivery partners and it is important to ensure that the local connection with communities, land managers and users is not lost or undermined in the new arrangements.

For further information, in the first instance contact:

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