

Position Statement

Keeping Area Statements under review

What is this document about?

NRW published the first iteration of Area Statements on 31st March 2020, as a duty under the Environment (Wales) Act 2016. This document sets out our position on how we will keep them under review, which is also a duty under the Act.

Who is this document for?

This document is for staff and stakeholders involved in any aspect of Area Statements. It provides clarity around how we are discharging our duty to keep Area Statements under review under the Environment (Wales) Act 2016.

Contact for queries and feedback

Natural Resources and Well-being Strategy and Policy Team
SMNR@cyfoethnaturiolcymru.gov.uk

What are Area Statements?

As required by the Environment (Wales) Act (2016), NRW must prepare and publish statements for the areas of Wales that it considers appropriate for the purpose of facilitating the implementation of the Welsh Government's Natural Resources Policy (NRP).

NRW has been at the heart of developing a series of innovative Area Statements covering seven separate, yet hugely diverse, parts of Wales' land and sea. The first iteration of Area Statements was published on NRW's website in March 2020. But these are not just NRW documents – they have been prepared with stakeholders and are for everyone to work together to tackle the climate and nature emergencies.

Each Area Statement is articulated through a formal webpage, which outlines the key challenges facing that particular locality, what we can all do to meet those challenges, and how we can better manage our natural resources for the benefit of future generations. They are both an evidence base and a way of working collaboratively, and they inform local development plans, well-being plans, protected landscape management plans, and the plans that NRW lead on, such as forest resource plans and flood risk management plans. Behind those webpages sits a broad range of networks and partnerships (internal and external), delivering those priorities and opportunities, as well as guiding NRW's core work.

Area Statements are also a feedback mechanism – as part of the application of the ecosystems approach to the management of our natural resources – through which we can synthesise and assess what's happening on the ground and where change is occurring across environmental, social, economic and cultural spheres. We need to collectively learn from the different innovative approaches being taken in different places across Wales and find new ways to transform the way we live, work, and play, so that our natural resources are safeguarded for their services and benefits to current and future generations. That learning on ecosystem change, and the social and economic systems that relate to it, will be captured through the State of Natural Resources Report (SoNaRR), which is the statutory mechanism for NRW to assess the extent to which the sustainable management of natural resources (or SMNR) is being achieved.

What are we required to do?

Section 11(6) of the Environment (Wales) Act (2016) specifies that “NRW must keep Area Statements under review and may revise them at any time”. It also requires that we explain how the principles of SMNR have been applied in preparing the Statement, including any revisions to it. It will therefore be important to connect the opportunities for reviews, with the collective learning being gathered through working differently.

How has this position statement been prepared?

This is a **draft** position statement for discussion and input from stakeholders. It has been prepared by a cross-cutting task and finish group of NRW staff and signed off by NRW's Natural Resources and Well-being Integration Sub-Group.

Viewed together, the seven Area Statements (6 terrestrial, 1 Marine) can be seen as a collaborative response to the NRP, published by the Welsh Government in 2017, which set out the key challenges and opportunities for the sustainable management of Wales' natural resources into the future. A revised NRP is expected following each new Government, so it is timely for NRW to confirm its position on keeping Area Statements under review.

What do we define as a “review”?

A review is normally regarded as a chance to take stock, evaluate, and set a revised direction if required. The principles of SMNR also state that we *manage adaptively by planning, monitoring, reviewing and, where appropriate, changing action*; which is reflected in the way we are working.

However, Area Statements and the networks that sit around them, are continually shifting and evolving. As well as facilitating the national priorities in the NRP, they respond to local drivers, stakeholder defined priorities and fluctuations in resources. Their focus, as set out in the Act, remains the priorities and opportunities set out in the NRP. This sets the Welsh Government's direction and will be a key part of the review process.

This position statement will apply to both national policy changes as well as other significant factors such as new evidence or a change in resource availability.

The statutory guidance for Part 1 of the Act also states “*Area Statements play a key role in delivering the spatial element of the NRP through identifying the areas in Wales where taking action at the right scale, both directly by NRW and through advocating action by others, can maximise benefits and identify synergies across policy areas. The aim is for action by NRW and others to be focussed in areas of most benefit and for these areas to be clearly identified, together with the rationale for why they have been prioritised*”.

We therefore need to be clear about which elements of the Area Statement can be more formally reviewed - and how to communicate the results of that review - taking into account both the relationship to national policy and the iterative nature of how they work.

With this in mind we have identified two key elements:

- **A change in policy direction**, as expressed through the NRP, or other significant WG policy. The NRP is the main policy steer for Area Statements, supported by evidence in the quinquennial SoNaRR. There may be other Government policies that have considerable implications which could result in new issues or opportunities being identified, or significant new pieces of evidence that come to light. **This is considered in Part 1 below.**
- **Area Statement webpages, and other communication tools.** This is the main source of up-to-date information on priorities, opportunities, actions, who and how to be involved – which is more “static” and needs to be regularly updated to reflect the current situation, as well as the outcome of any review. **This is considered in Part 2 below.**

For both elements, NRW has a duty to set out how the principles of SMNR have been applied in keeping them under review.

Part 1 – Changes in policy direction

When considering changes in national policy it will be important to recognise that these can be:

- *Major and/ or unplanned* (changes as a result of shocks such as EU Exit, the declaration of climate and nature emergencies, and COVID recovery);
- *general or iterative* (such as general policy updates, e.g. NRP, transport, planning, health, etc)
- *very specific* (2030 targets around carbon reduction or protected areas).

For any scenario it will be important to draw upon a range of experiences from both policy specialists, and practitioners on the ground, to build an understanding of the likely implications of the policy change, and what it might mean for delivery.

It may not always be necessary to change how we are working as a result, or the information we publish on our webpages – a review may conclude that we need to increase the pace and scale of the work, for example – but we will acknowledge that due consideration has been given to the policy change, and the outcome of that (changes, or no changes) in a formal way.

Appropriate use of resources is another key factor – it is as important to ensure that we do not detract from important delivery work on the ground, particularly where there are existing partnerships working well. We do not believe a traditional “stop, take stock, and start again” approach would be particularly favourable with stakeholders. It is important to ensure any changes in policy direction can be woven into the fabric of what is already happening.

Given the broad scope of likely policy changes – major, iterative or specific – it is our position not to fix a process up front that doesn’t meet the needs or scale of the policy change, as we may miss important opportunities for involvement. As a principle, all processes will bring together policy experts and practitioners on the ground.

Therefore, our position is as follows:

- NRW will make an informed decision about how best to update Area Statements in response to any policy changes, on a case by case basis. In doing so it will:
 - o adopt a proportionate response
 - o involve others in the decision, making the best use of existing networks and involvement mechanisms.
 - o seek to minimise disruption to delivery
 - o publish its approach
- We will develop our decision-making approach through which any potential changes will be appraised.
- Specifically, in relation to Welsh Government revisions of the NRP, NRW will:
 - o provide feedback and learning from our experience of the facilitation of implementing the NRP through Area Statements, along with evidence presented in the latest SoNaRR.

- o Provide a clear statement that sets out how Area Statements will be responding to the revision of the NRP – this will follow Part 2 of this position statement.

The Strategic Environmental Assessment (SEA) and Habitat Regulations Assessment (HRA) screening opinions as well as Equalities and Health Impact Assessments for the Area Statements process will be reviewed as necessary and in line with the published position statement on SEA/HRA.

Part 2 – Keeping our communications under review

NRW has chosen to use its website as the main communication channel to summarise the key challenges and opportunities for each area of Wales, which acts as the formal Area Statement (discharging the s11 (1) duty to prepare and publish Area Statements). It follows that the webpages will therefore require regular review to ensure content is relevant and up-to-date. This will ensure that stakeholders are clear about the work happening through the Area Statements process, and the areas of focus that are identified to achieve greatest benefit for SMNR.

Each area uses other communication channels (including newsletters, social media, and other online engagement tools) to develop the networks and partnerships that support ongoing implementation of Area Statements. These mechanisms are more flexible and adaptive and can be suited to meet the different stakeholders and involvement methods being utilised. These are likely to evolve continuously over time. We will publish information about these communication channels so that stakeholders can find the most appropriate way to participate in Area Statements.

At the national level, there are a number of existing stakeholder networks and forums. We will continue to involve and engage through these mechanisms and use them to draw out key learnings about SMNR and around the Area Statements process in particular.

The [Wales environmental information portal](#) is a complementary website which contains NRW and other spatial data. This is currently being developed as the evidence base to support Area Statements. Some of the data is interpreted, and some of the data itself is currently presented without interpretation. Work is ongoing to provide useful solutions for different user needs, and we hope in the future to be able to include datasets within the portal that become part of the formal Area Statement.

There are conversations happening at different scales across Wales. We do not wish to set up new conversations every time we review an aspect of Area Statements and would rather utilise the networks we already have.

Therefore, our position is as follows:

- We will continue to use our website to formally communicate Area Statements, including any changes as a result of policy changes and reviews, as outlined in Part 1 of this position statement.
- We will provide an annual update which will include the implications of policy changes, identifying key learnings from the previous year, and what has changed as a result.

- We will revise other content as needed to keep our Area Statement webpages relevant.
- The annual update may include case studies and other evaluations to help assess both the extent to which the sustainable management of natural resources is being achieved (which is the objective of SoNaRR), and the implementation of the NRP.

In line with the statutory guidance, the purpose of these evaluations should be to continue to identify where action by NRW and others can be focussed in areas of most benefit, together with the rationale for why they have been prioritised.

Reviewing this position statement

We have set the date for review date for this position statement as September 2022. This will allow us to consider whether it remained fit for purpose throughout the NRP refresh process, and the publication of our annual update.

DRAFT