

Cynulliad Cenedlaethol Cymru  
Y Pwyllgor Newid Hinsawdd,  
Amgylchedd a Materion Gwledig  
Fframwaith Datblygu Cenedlaethol  
Cymru  
NHAMG (5) NDF 12  
Ymateb gan Coed Cadw

National Assembly for Wales  
Climate Change, Environment and  
Rural Affairs Committee  
National Development Framework  
CCERA(5) NDF 12  
Evidence from Woodland Trust

---



## National Development Framework

Comments to Climate Change, Environment and Rural Affairs Committee.

13<sup>th</sup> November 2019

### Welcome Transition towards new Thinking

1. We greatly welcome some of the innovative thinking and aspiration in the NDF, but we don't think the NDF is ambitious enough.
2. A test of the outcomes and policies described is whether they effectively address the climate and biodiversity emergencies.
3. The inclusion of wider environmental and well-being outcomes as purpose of infrastructure development is very welcome.
4. We greatly welcome the inclusion within the remit of the NDF a substantial green infrastructure requirement and the Wales National Forest proposal.
5. It is apparent that a very welcome transition in thinking is underway, but it is not yet fully embedded, even within the draft NDF document, and is still work in progress.

### More Ambition

6. We think the NDF can be more ambitious by imposing more explicit mechanisms that will ensure the more progressive aspirations will actually be delivered. These could include:
  - i. A 25% tree cover requirement as part of a mandatory green infrastructure provision in new development. Such a tree cover target would instantly make mature trees valuable and incentivise their retention. It would ensure new developments positively contribute to meeting a wider minimum 20% tree cover target for all urban areas.
  - ii. Enable Coed Cadw to help move forward the development of new Wales National Forest through the stakeholder scoping exercise that we have proposed to the Welsh Government.
  - iii. Adopt a requirement for a "Biodiversity Net Gain" protocol to ensure that all developments including housing and renewable energy, actively improve biodiversity through a hierarchy of assessment, protection and creation. This will ensure that infrastructure development

becomes part of the solution to biodiversity decline rather than continuing to be one of the drivers of decline.

- iv. Can NDF provide a framework for “action everywhere” solutions which can more effective approaches than single location “big ticket” projects? This could apply for example to flood mitigation works, biodiversity recovery, housing provision, active travel, etc, etc.

### **A New Wales National Forest**

7. We believe the First Minister’s intention is for something inclusive and inspirational and think it is important that this political leadership is maintained. It is important that this new initiative does not just become a utilitarian delivery plan for the woodland expansion targets or a rebranding of the existing public forest estate.
8. We see a new “fforest” as a well wooded landscape which provides an attractive and healthy environment in which many things can happen, including housing and development.
9. We see the programme operating on a national scale, connected from north to south and across both urban and rural locations. We see a truly national and distinctive Welsh brand, flexible to local circumstances.
10. We think it essential that public and stakeholder engagement is at the heart of developing activity. Throughout the NDF document there are frequent reference to communities but the process of community engagement or co-design is barely discussed.

### **The Rural Economy**

11. Attention to the rural economy seems rather cursory. Professor Terry Marsden has highlighted how a combination of centralisation and austerity has hollowed out the infrastructure supporting rural communities and business. There could be more attention to the strategic opportunities and needs of the rural economy. This is particularly relevant to woodland and forestry both in terms of the opportunities this sector offers, and the need for distributed rural infrastructure.
12. It would help the credibility of both the NDF and the Area Statement process if there was a clear description of how Area Statements will guide the priorities, opportunities and environmental constraints in spatial planning guidance.

Coed Cadw: vision for a New Wales National Forest

