



Coed Cadw – the Woodland Trust

1. Coed Cadw – the Woodland Trust is the UK's largest woodland conservation charity, working for a UK rich in native woods and trees, for people and wildlife. In Wales we have over 14,000 members and 85,000 supporters. We manage over 100 sites in Wales covering 2,697 hectares (6,664 acres). Wales is one of the least wooded countries in Europe, with woodland making up just 14% of the landscape and less than half of this is native woodland.

Future Wales – the National Plan 2040

2. There is much that we welcome in “Future Wales – the National Plan 2040”
3. We welcome the over-arching recognition that a more rounded approach to development is needed, founded on the sustainable development principles of the WCFG Act, and delivering social and environmental outcomes, and not so focused on construction.
 - a. The Future Generations Report provides a very comprehensive and valuable assessment of issues within the planning system. We suggest this provides a valuable basis for further consideration. We noted that one of the conclusions was that there appears to be a significant lack of capacity within Welsh Government to support implementation and the capacity building that is needed in the planning system.
4. We welcome the recognition in climate and ecological emergencies in the introduction, and the acceptance that the environment and natural resources underpin and are essential for economic well-being and growth. (e.g. p47)
 - a. There are predictable impacts from these emergencies which need to be factored in at all levels in the planning system. Major disruptive events are likely to become more frequent – more severe weather, droughts, floods, fire, travel disruption,

more pandemics. We suggest a greater focus on community resilience – local services, reduced dependency on car use, and the embedding of quality accessible green space and wildlife habitat at all scales. This suggests a higher priority for enabling full engagement with all parts of the local community, and for robust transparency in decision making.

- b. The Environment (Wales) Act is only mentioned in passing. We suggest that an explicit reference to the requirements of the Act, in particular the duty to maintain and enhance biodiversity, would be a useful reminder to those engaging in the planning system, particularly in relation to policies 1 to 7.
5. We welcome the commitment to strategic action to safeguard ecological networks and secure biodiversity enhancements (net-benefit) (e.g. p11, p76)
 6. We welcome the inclusion, in this top tier of spatial strategic planning, of policies that reflect the value of environmental land management - Policy 9– Resilient Ecological Networks and Green Infrastructure and Policy 15 on the National Forest.
 - a. We suggest that this could be better integrated into Policies 1 – 7, in which the overarching importance of environmental sustainability is barely mentioned, except in relation to the provision of green infrastructure

Future Wales Outcomes (pp 54-56)

7. We welcome the commitments to reduce pollution (outcomes 5 and 9)
 - a. We suggest this is a key area for monitoring performance, given current issues and rising emissions of some pollutants, including ammonia.

Policy 8 - Flooding

8. We welcome the clear steer towards the greater application of nature based solutions and look forward to this becoming apparent in future flood management plans.
 - a. Targeted woodland creation is one such nature based solution, and will contribute to meeting the target to increase tree cover (see para 13b), and we suggest the appropriate opportunities for this should be proactively identified in Area Statements and flood management plans.

Policy 9 - Resilient Ecological Networks and Green Infrastructure

9. We welcome the very comprehensive expectations set out for the provision of green infrastructure, set out in policy 9 and reflected throughout the document.
 - a. In the light of the importance of expanding Wales's tree cover (policy 15) we suggest that it would be appropriate to emphasise the importance of the tree component of green infrastructure, and

- b. establish an expectation of a minimum target for tree cover in new developments. We suggest 30%.
 - c. establish an expectation of a minimum target for tree cover in urban areas. We suggest 20%.
10. We welcome the inclusion in Policy 9 of the need to identify and safeguard areas necessary for the protection of habitats and species, and we welcome the commitment to reversing the decline in biodiversity, and the emphasis given to safeguarding. The retention of irreplaceable mature habitat such as ancient woodland is central to this.
- a. The emphasis to safeguarding given under this Policy is very welcome and we suggest that additional new guidance on biodiversity enhancement (net benefit) is required, especially as many developers will assume that the dubious standards developed in England will apply. Guidance needs to clearly set out why it is wishful thinking to believe that new habitat creation can provide biodiversity enhancements that compensate for the loss of ancient habitats, or that new tree planting can compensate for the loss of the benefits of mature trees.
 - b. We suggest reinforcement would be useful, based on the content of the Chief Planners letter of October 2019 to Heads of Planning. “The attributes of ecosystem resilience (PPW para 6.4.9 refers) should be used to assess the current resilience of a site, and this must be maintained and enhanced post development. If this cannot be achieved, permission for the development should be refused.”
 - c. The map of “National Natural Resources” (p69) risks suggesting that anything not mentioned is not of national importance

Policies 10 -12: Connectivity –Transport

11. Road construction continues to be an important source of damage to ancient woodlands and other irreplaceable habitats. Coed Cadw is not against road and infrastructure developments and we welcome the processes encouraged by the WBFG Act that ensure consideration of the full range of sustainability criteria. We welcome a more inclusive and balanced approach to strategic transport planning. We believe a key example of the impact of consideration of sustainable development has been the Welsh Government’s decision on the M4 relief road. WBFG Act and the Future Generation Commissioner’s intervention ensured that the full impacts and sustainable development criteria were taken into account, and prevented a decision that marginalised certain stakeholders.
- a. We welcome the development of the Welsh Transport Appraisal Guidance (WelTAG), and intention to encourage a different approach and way of working which requires different mind sets and allows people to take a more holistic and integrated approach to seeking solutions to transport issues. We suggest that this should be written into the Future Wales document

12. We have recently been approached by Transport for Wales seeking advice on the management of rail-side trees. This issue has been handled very poorly by Network Rail, despite the comprehensive recommendations in the Varley Review. This has led communities seeking support from the Woodland Trust because of poor engagement from Network Rail. We trust that Transport for Wales' willingness to proactively seek stakeholder engagement is an example of a body embedding the sustainable development principles in the way they work.

Policy 15 - Wales National Forest

13. We welcome Policy 15 the Wales National Forest and the coverage of the benefits that trees and woodland can provide.
 - a. We are strongly of the view that the ambition for tree cover expansion (at least 2,000 ha from 2020) is not sufficient and will not meet the recommendations of the Committee for Climate Change. We suggest that the NDF should clearly signal an intention steadily increase the rate of tree cover expansion beyond this minimum figure.
 - b. We suggest there needs to be a commitment to creating a multi-track delivery plan, covering the full range of approaches, including agroforestry, increasing urban tree cover, natural woodland expansion in addition to more conventional new plantation creation.
 - c. Every policy in Future Wales should identify contributions to this goal, for example as suggested in paragraph 8 above.
 - d. We think it is important to include a statement on looking after the woodland we already have, especially the protection of surviving mature trees and woodland. In terms of delivering benefits including climate mitigation through carbon storage and sequestration, the protection and appropriate management of existing woodland is just as important as creating new woodland.

The Regions and Area Statements

14. We welcome the intent, in Policy 9, that *"Any priority areas for action identified in Area Statements are a material planning consideration and development plans should set out appropriate policies to safeguard and connect these areas."*
 - a. Our reading of Area Statements is that they are not as yet doing this. We would like to see Area Statements identify regional initiatives suitable for support, such as collaborative landscape management projects.
 - b. For example the Mid Wales Area Statement identifies the issue of the over-development of intensive poultry, and the damaging impacts arising, but provides no guidance for addressing this.

15. We welcome the reference under Policy 19 - Strategic Policies for Regional Planning, to the *“identification of green belts, green corridors and nationally important landscapes where required”* and *“ecological networks and opportunities for protecting or enhancing the connectivity of these networks and the provision of green infrastructure.”*
- a. We are surprised that Policy 19 does not refer to Area Statements, or provide an expectation of what Area Statements should provide.
 - b. Where do regional growth partnerships such as the North Wales Ambition Board, the Mid Wales Growth Deal and the Western Gateway Initiative fit in? We have noted with some concern that the brochure for Western Gateway Initiative uses none of the language of sustainability, biodiversity, environmental safeguarding, or green infrastructure that characterise Future Wales.

Monitoring and Evaluation

16. We welcome the attention given to monitoring and review.
- a. The monitoring and review plan includes as one of 7 key questions *“Helped strengthen ecosystems and enhanced biodiversity?”*, but does not describe how this question will be answered. It is difficult to see how this can be measured without more specific definitions and targets, especially for the protection and maintenance of high value irreplaceable habitat such as ancient trees and woodland.
 - b. We will use the measure of the number of ancient woodlands and ancient trees that we know to be threatened by planning applications. There are currently 149 cases in Wales of ancient woodlands under threat from planning applications. We expect the number of cases to drop significantly if the sustainability aspirations of the planning system are to be met.
 - c. Monitoring the effectiveness of outcomes from planning decisions is one of the issues usefully analysed in the Future Generations Report.