



Coed Cadw – the Woodland Trust

Submission to the Public Accounts Committee of the Senedd

Barriers to the Successful Implementation of the Well-Being of Future Generations (Wales) Act 2015

Introduction to Coed Cadw – the Woodland Trust in Wales

1. Coed Cadw – the Woodland Trust in Wales 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, 85,000 supporters, 180 volunteers and 20 staff. We manage 120 woodland sites in Wales, all freely **accessible to the public**, covering 3,000 hectares (7,400 acres). Wales is one of the least wooded countries in Europe, with woodland making up just 15% of the landscape and less than half of this is native woodland. Around 4% of land in Wales is classed as **ancient woodland** (persisting since 1600), our most valuable woodland for unique communities of plants and animals; a large proportion of this makes up our Celtic Rainforest.
2. We **support communities and landowners** with woodland protection, restoration and creation – annually this amounts to over 70 Woods Under Threat cases, some 400 free tree packs to schools and communities and over 200ha of private landowner outreach support to create woodland and restore ancient woodland.

Awareness and understanding of the Act and its implications

3. The WFG Act is a fundamentally important piece of legislation which underpins a lot of what Coed Cadw stands for and the progress we want to see in Wales. However, we see disappointing evidence in our day to day work, that not all public bodies and committees understand the vital **importance of protecting** mature, healthy trees and woods for a more resilient Wales. There are examples of decisions which seemingly have not taken into account the long term value of trees and their associated benefits and therefore do not protect the interests of future generations, decisions not taken in the spirit of the Act. This may partly be the **lack of awareness** on how to build **natural capital valuation** into decision-making – an area that is quite complex.
4. Furthermore, when planning authorities are under economic pressures, there seems to be a presumption in favour of private developers to remove healthy mature trees, for perceived cost effective development. This does not take into account the long term ecosystem services, or **public goods** that are delivered over the life time of those said trees which would suggest that the Act and its implications are not fully understood and taken on board in the planning process.
5. The Act has helped “change the narrative” in a very constructive way BUT **nature/biodiversity is still lacking** in public bodies’ understanding of the WFG Act’s second goal of ‘A Resilient Wales’. There is much acknowledgement of creating new community nature areas or planting trees, important actions in themselves, but this needs to be balanced with protecting and enhancing what we have already got. For example, in some Local Authority wellbeing plans we have noticed that there are references to ‘green spaces’ which could, as a minimum, mean mowed grassed

parks with little biodiversity value. **Existing trees** have an important value to play in populated areas for the natural services they provide (shade, shelter, wildlife, water and pollutant absorbers, air purifiers, carbon stores, social and cultural significance etc).

6. The Act enhances appreciation of the value of the third sector, however it does not provide a clear route to stronger support and **long term funding** or a commitment from the public sector to third sector partnerships which would make the Act clearer to measure for cross sectoral collaboration.

The resources available to public bodies to implement the Act and how effectively they have been deployed

7. The very comprehensive **Future Generations 2020 Report**, and the thorough analysis of achievements and issues, is a valuable resource which needs to be proactively used for guiding future policy development that doesn't marginalise some stakeholders. It contains a vast amount of useful information and recommendations and a way needs to be found to get these distributed and incorporated into active policy discussion and development.
8. **Wellbeing plans** are a good step forward but we haven't experienced much practical implementation arising from these plans. **Area Statements**, in particular, are good in principle and over which there have been many consultation and process related activities but real progress on the ground has been very slow. It is not clear how the Area Statements will bring partnerships together in relation to environmental matters with the right blend of stakeholders and experts in their fields. We have found it difficult to contribute and understand what we can get involved with but we see the potential in this being a significant resource to call upon, especially around the calls for a greener recovery. At the moment it is not clear whether this will be a resource.
9. We do not see many signs as yet on the **mainstreaming of environmental matters** in ways which support economic and social resilience for Wales. Words have not been backed up with resource allocations of people and money especially for NRW and Local Authorities who we anticipated would be repurposing and increasing staff to tackle these WFG requirements for a sustainable approach to the services that they provide for the public. This is especially so in planning and environment departments which have seen significant decreases in ecologist and nature **conservation expertise** over the years which means they are under-resourced and over-stretched, and now trying to assist in implementing the WFG Act on top of everything else is a challenge.
10. Community and stakeholder engagement in multi-purpose woodland management are strongly aligned with the well-being goals and ways of working. This has helped make the case for funding for the third sector. The Welsh Government's refresh of its Woodlands for Wales Strategy has further helped steer the woodland sector more widely in the direction of collaborative working in search of a balance between social, environmental and economic objectives. This is supported by ourselves, CONFOR, Woodknowledge Wales and others. We now see this reflected in the objectives and piloting of Welsh Government's proposals for a new Wales National Forest – BUT the biggest barrier to this succeeding is cross-party political support following the May 2021 elections and **significant resource allocation** to reflect the Wales-wide nature of this natural asset as a long-lasting initiative.

Support provided to public bodies by the Future Generations Commissioner

11. It is not clear if the FGC has the power to set legally **enforced milestones**, as referred to in the Act or whether this lies with the public bodies. At present the guidance provided is largely about what 'should' be taken on board by public bodies not what 'must' (although the Act itself does, but it is not clear if or how this is enforceable). This distinction would give clearer direction about what the required/essential (rather than desired) steps need to be and drive action that the Act requires for implementation to be meaningful.
12. The Future Generation Commissioner's intervention on the Welsh Government's decision on the M4 relief road is an exemplary example of the impact that can be achieved to ensure sustainable development. The FGC office was no doubt supported significantly with information from eNGOs which in itself took up an enormous amount of resource over several years, charitable money that could have alternatively been spent on direct nature conservation. To ensure the FGC is further supported on future decisions and that do not marginalise stakeholders by way of the time needed to contribute, community groups and NGOs need to be given easy routes to submit evidence and additional funding to **support significant casework** when appropriate.
13. Coed Cadw is not against road and infrastructure developments and we welcome the processes encouraged by the WFG Act that ensure consideration of the full range of sustainability criteria. However, there is a considerable **challenge in engaging** with the WelTAG consultation process, and the subsequent scrutiny of each stage, given the very limited capacity in community groups, and NGOs such as ourselves. We understand that the Future Generations Commissioner has raised concerns with the Welsh Government that the Guidance is not being applied as intended and that there appears to be a significant lack of capacity within Welsh Government to support implementation and the capacity building that's required.

The leadership role of the Welsh Government

14. Since the creation of Natural Resources Wales there has been a significantly strengthened commitment to sustainable multipurpose management on the public forest estate in Wales but this is yet to be fully translated into operational delivery. A commitment to sustainable forest management is in theory written into the UK Forest Standard.¹ In Wales the WFG Act provides an additional directive, raising the bar on the meaning of sustainable forestry by requiring that a balance between objectives is 'sought', rather than merely 'considered'. A potential barrier is the Welsh Government ensuring that the current review of the UK Forest Standard reflects this **higher expectation** in Wales.
15. We would like to see Ministers and Members of the Senedd raising awareness of the rich wildlife assets that this nation has and should have. The Wales Environment Link Species Champion initiative is a good example of where cross party support can be given for nature conservation and its value to the people of Wales. In particular, there needs to be a strong and concerted effort to **prioritise nature most at risk** and to set the narrative of the importance of nature for future generations so we don't lose more species in the lifetime of this generation.

¹ <https://www.forestresearch.gov.uk/tools-and-resources/uk-forestry-standard/background-uk-forestry-standard/>

16. Barriers are likely to exist in potential **cross-border co-operations** between England and Northern Ireland with different countries operating to different legislation and guidance. For example, in stark contrast to the Wales National Development Framework is the Western Gateway Prospectus² which includes no reference to sustainability, biodiversity, green space or green infrastructure. It uses green growth as a heading but with no content. Welsh Government is in a strong position to influence cross-border commercial initiatives so that public body decisions do not negatively impact on the future generations of Wales.
17. The unique Welsh Government Plant! Scheme which plants a tree for every child born or adopted in Wales is a great opportunity to create **tree guardian journeys** from cradle to grave. However, the management of this scheme is uncertain and has not been given the prominence which we feel it could offer in linking with wellbeing plans, e.g. every PSB ensure there is a Plant! Site within their area of jurisdiction. It is a scheme that is held in high regard in other UK nations and one which the Welsh Government should hold on to with high esteem.

Any other barriers to successful implementation of the Act

18. To drive cultural change within the public sector, we suggest there needs to be **stability** to move from one state to a new one. Given the pandemic we are currently in, and with Brexit on the horizon, public body operations are not in a normal state. The uncertainty around plans, resources and the future state of the world will create insecurity and require flexibility to cope with large scale changes. This is a key barrier to better embedding of social and environmental factors into economic decision making. Wales should lead the way with a **Green Recovery plan** that is core to economic and social recovery creating a climate of certainty and assurance which reflects the urgent climate and biodiversity crises we are in and do what is needed at pace to ensure our future generations are not inflicted with the exponential costs of a less resilient environment.
19. Leadership should also come from within public bodies other than Welsh Government. Each public body needs to have a range of **environmental champions/leaders** to make sure that wellbeing plans are fully integrating environmental needs into socio-economic issues in a joined up way. The environment and in particular nature/biodiversity still represents the **poor relation** in the sustainability triangle as evidenced by the amount of resource allocated to it. Economic and Social services need to be 'greened' to make them truly sustainable. The NRW taskforce on Green Recovery has received over 180 proposals from a wide range of stakeholders including a substantial idea for a **National Nature Service** – a way of embedding the health of Wales with Nature experiences.
20. It is encouraging to see the focus and attention on the natural environment from Public Services Boards in their areas. Also, some health boards and national bodies in Wales are increasingly making the connections between a healthy, natural environment and better health and wellbeing. However it is not clear how the environmental sector can best **work with PSBs** and what strategically is the best model for working to bring out the best in all stakeholders towards common goals - some bridging and integration is needed to get the impact that is needed.

² <https://western-gateway.co.uk/wp-content/uploads/2020/02/Western-Gateway-ENGLISH-WEB.pdf>

21. We note that the Act has received **cross party support** and is an example of what can be achieved through a consensual approach. It provides a bastion against the politics of selfishness and short-termism. We hope this continues despite indications of a move towards more adversarial politics.
22. There continues to be an on-going challenge in translating the aspirations of the Act into **operational delivery**. Whilst resourcing is a constraint, we think there is more that can be done to ensure that operational practices are updated to better reflect sustainable development goals. Examples include accelerating emissions reductions, planning system process and decisions, improving community and stakeholder engagement, and supporting more sustainable multi-objective land management.
23. The 'Future' focus of the Act can tend to imply something distant, whereas thought is now needed on how the Act can engender the **sense of urgency** needed to address climate and biodiversity emergencies now.

How to ensure that the Act is implemented successfully in the future.

24. Illustrating the spirit of the Act, there is an opportunity to combine the **Wales National Forest Programme** with a refresh of the Welsh Government's **Plant! scheme**, proposals for a Young Peoples Forest and a possible role for the Welsh **Youth Parliament**.
25. For the environmental pillar of sustainable development much depends on the capacity and willingness of Natural Resources Wales to act effectively to address sustainability issues, especially the on-going decline in biodiversity. Ensure **NRW has the clarity of purpose** and resources necessary to do this.
26. We suggest there is a need for a mechanism for scrutiny that can lead to **legally enforceable** implementation of the Act at every level where public money is being invested
27. As we leave the EU there is a looming gap in **environmental governance**, especially in Wales, where only temporary arrangements are proposed until a new Government brings forward new legislation. This means that citizens have no legal means to hold government to account where it fails to deliver on its environmental, and other, commitments.
28. Commitment to sustainable development appears to be weak at UK level. Governance in Wales can show leadership, for example, in its promotion of infrastructure projects in Wales, that respect the Welsh Parliament's **statutory duty** to promote sustainable development.
29. With the accelerating impacts of the **climate and biodiversity emergencies** the "Future Generations" focus of the Act is more vital than ever. We suggest the Act deserves a much enhanced profile, and determined implementation, especially in driving the criteria for a green and sustainable post Covid recovery. There needs to be certainty around delivering on the **FGC's Five Point Plan**.

[REDACTED]

26th November 2020