

ROCP 27, National Trust Cymru

Senedd Cymru | Welsh Parliament

Pwyllgor Newid Hinsawdd, yr Amgylchedd a Seilwaith | Climate Change, Environment, and Infrastructure Committee

Adolygiad o flaenoriaethau'r Pwyllgor ar gyfer y Chweched Senedd | Review of the Committee's priorities for the Sixth Senedd

Ymateb gan Ymddiriedolaeth Genedlaethol Cymru | Evidence from National Trust for Wales

Your views

1. What are your views on the Committee's three strategic priorities: Climate Change; Sustainable Communities: and Protecting and enhancing the natural environment?

National Trust Cymru support the continuance the Committee's three strategic priorities: Climate Change; Sustainable Communities: and Protecting and enhancing the natural environment.

2. To what extent are the Committee's three strategic priorities still relevant, reflecting on social, economic and environmental developments since they were set at the start of the Sixth Senedd?

National Trust Cymru think that the Committee's three strategic priorities are still relevant, reflecting on social, economic and environmental developments since they were set at the start of the Sixth Senedd.

We know that the 2020s are the decisive decade for climate and nature action and putting Wales on the pathway to net zero by 2050. We all have a role to play in helping Wales get there and you'll be aware that National Trust Cymru is working towards reaching carbon net zero as an organisation by 2030.

3. What are your view on the Committee's detailed priorities/outline programme of work for Years 3 to 5 of the Sixth Senedd (set out in its report, Priorities for the Sixth Senedd?)

In terms of priority 3 – Protecting and enhancing the natural environment

Sustainable Farming Scheme

Scrutinising the Sustainable Farming Scheme must be a priority for the Committee in conjunction with the Economy, Trade and Rural Affairs Committee, with the final consultation on the scheme due for publication towards the end of this year.

The scheme is an opportunity to shape a more sustainable future for the farming sector in Wales that meets the needs of people, nature and the environment and contributes to the nation's commitment to be carbon net zero by 2050.

We believe that sustainable and profitable farming needs a healthy environment, which is in turn sensitively farmed. The SFS must drive the uptake of agroecology in Wales, enabling farms to produce within the natural capacity of the land with reduced reliance on external inputs, and support farmers to manage the environmental and cultural assets of their land.

It is crucial that the scheme incentivises ambitious actions and offers a full and fair reward in return for farmers and land managers playing their part in nature's recovery, taking climate action and delivering other public goods. National Trust Cymru would be happy to meet with members of the committee to discuss our views as a landowner with a commitment to ensure nature friendly farming on our land but also, to ensure a sustainable future for our tenant farmers.

The need for a nature positive Bill in Wales

In June 2021, the Senedd declared a nature emergency and called for stronger action to address biodiversity loss, including statutory biodiversity targets and the establishment of a statutory governance body for Wales. The Welsh Government supported this declaration, which is reflected in the updated Programme for Government embedding the Co-operation Agreement with Plaid Cymru. The Welsh Government has repeatedly promised legislation on environmental principles, governance, and nature recovery targets; most recently the Minister has pledged for an Environmental Governance & Environmental targets Bill a white paper on Nature targets by Jan 2024.

It is crucial that the committee scrutinise the Environmental Governance & Environmental targets Bill a white paper. To ensure that the legislation includes the following:

1. A clear headline goal – Nature Positive Wales As an overarching headline goal, we want to see a duty on Welsh Government to achieve a Nature Positive Wales.
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As the Minister for Climate Change has said, 'nature positive' is the rallying cry that nature needs. Achieving a Nature Positive Wales would mean:

- The systemic loss of nature has been stemmed by 2030 and nature is demonstrably on the path to recovery, with species and habitat indicators showing improvement against a 2020 baseline.
- Recovery of species and habitats by 2050 against a baseline of circa 1970, so that species abundance and distribution is on average rising, extinctions have ceased, and habitat quality and extent are increasing to the benefit of biodiversity.

This definition should be set out clearly in primary legislation so that Nature Positive is both meaningful and measurable. There should be key milestones along the way (e.g. 2035, 2040) to see species populations and habitats improving – so that nature decline is halted, site protection is enhanced, and recovery is well underway. This will be necessary to establish sufficient ambition, provide impetus for immediate action, direct the necessary finance and ensure maximum accountability for meeting the targets.

continued in further information....

4. To what extent are the Committee's detailed priorities/outline programme of work still relevant, reflecting on social, economic and environmental developments since they were set at the start of the Sixth Senedd?

No response.

5. Are there any other matters related to the Committee's priorities/work programme/ways of working that you would like to comment on?

2. A framework of targets to measure progress against
Success in achieving a Nature Positive Wales will need to be measured based on a number of components. The primary legislation should include a duty to set long term and interim, outcome-based targets in secondary legislation for: species abundance, species distribution, species extinction risk, habitat quality and habitat extent (including condition of protected sites and 30x30 (area protected and effectively managed for nature)). Each component should be assessed across terrestrial, freshwater and marine biomes.

This set of targets aligns well with the concept of the 'resilience of ecosystems' set out in the Environment (Wales) Act, which lists diversity, extent and condition along with connectedness and adaptability as key aspects of ecosystem resilience. The State of Natural Resources Report, which NRW is required to publish towards

the end of every Senedd term, provides an appropriate vehicle for reporting on these targets along with other environmental targets, although more regular updates on progress could also be required.

3. Reporting and accountability

Ministers should be required to set out detailed plans for delivering the targets, based on independent advice, and to report on progress. If adequate progress is not made, and/or interim targets are not met, Ministers should be required to set out their plans to remedy this to the Senedd and provide regular updates.

The Bill must also, as promised by the Welsh Government, establish a new environmental governance body for Wales. This body should have a remit to hold the Welsh Government to account in respect of its plans to meet the statutory targets, and progress made; Welsh Ministers should be required to show how they are taking account of the new body's recommendations.

The primary legislation must also include a duty to periodically review targets in light of available evidence and independent expert advice, supported by a power to amend targets to make them more ambitious where a need for this is identified.

Closing the environmental governance gap, created by our departure from the EU, and legislating to establish the outlined legislation is crucial, and scrutiny by the Committee to ensure that fit for purpose arrangements are put in place is essential.

6. Other information

In terms of priority 2 – Sustainable communities

We support the committee's programme but would like to see the committee to focus on the below topic's terms of renewable energy.

Renewable Energy

National Trust Cymru thinks that the committee should focus on how Welsh Government are taking consideration of several points in terms of long-term planning of renewable delivery as well as consideration of future demand as outlined below.

The potential for renewable energy generation in Wales is substantial, with abundant opportunities for both onshore and offshore development. This should include a mixture of all renewable energy including wind, solar, hydro and heat. National Trust Cymru would like to see Welsh Government policy and related targets to take into consideration all renewable energy to ensure that current and

future demand can be met no matter the weather or seasonal factors. National Trust Cymru support Welsh Government's target for Wales to be 100% self-sufficient. However, when considering a mixture of renewables Regen calculate that for Wales to be 100% self-sufficient Wales would need to generate and extra 70% more than our peak load demand. National Trust Cymru would like Welsh Government targets to incorporate 170% capacity which would allow renewable energy utilisation all year round.

Networks

National Trust Cymru welcome Welsh Government's commitment in the consultation to work with energy companies, network operators and Ofgem to understand and champion the needs of Wales for investment in energy networks capable of supporting a net zero society. However, it is still not clear how Welsh Government plan to address long-standing barriers to development such as grid capacity and infrastructure to support the integration of renewables, and what effect these barriers could have on Welsh Government targets up to 2035 and beyond.

National Trust Cymru would like to see Welsh Government bring forward a strategy which demonstrates how Welsh Government are going to ensure that grid capacity can support not only the immediate targets but to also factor in future need and demand as it grows.

Regarding the rollout of renewable energy networks and infrastructure consideration of Wales' commitment to sustainable development as outlined in the Well-being of Future Generations (Wales) Act (2015) is needed to ensure the needs of the present are met without compromising the ability of future generations to meet their own needs.

National Trust Cymru believe that all renewable energy projects, associated infrastructure and network developments should consider the opportunities to deliver renewable schemes that are holistically designed to consider the effects on the environment including wildlife, landscape setting and cultural heritage. It is important that schemes also take account of the long-term impacts beyond the initial lifecycle of the development, including the likelihood of requests for renewing consent, or increasing the scale of development in the future.

National Trust Cymru also notes that delivering renewable energy projects and associated infrastructure with respect for the setting and significance of places is possible and all projects should aim to do so. National Trust Cymru would like Welsh Government to work with developers both of individual schemes and on wider network infrastructure to develop positive approaches to biodiversity enhancement as schemes are rolled out.
