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Dear William Powell AM,

Response to correspondece received by Minister For Natural Resources

Apologies in the delay in getting back to you on this matter. May we thank you and the Committee for giving us the opportunity to respond to this letter formally and to share some of our thoughts on the matter for your consideration at your next meeting.

Coed Cadw broadly agrees with the letter the Committee received for the Natural Resources Minister, in the sense that the degree to which trees and other 'natural' flood defences are effective does depends on the location. We think the key issues are that;

- Trees and other natural solutions must be an integral part of decision making around flood defences solutions, and
- That the wider benefits of trees and natural solutions (for biodiversity, air quality, landscape etc.) are also factored in when making decisions on the most cost effective approach.

There is nothing ostensibly incorrect in the letter and much of it indisputable – trees are just one of many measures, their use for natural flood risk management needs to be assessed depending on location, topography etc. so it is right that we can't set a deterministic target for a certain number of trees across Wales to deliver reduced flood risk by a certain per cent.

However, we wish to highlight the fact that the influence of trees is real and supported by research and that assessing the cost efficiency of flood alleviation schemes needs to factor in the multiple benefits that land mangement based flood risk measures can deliver. Currently the calculations do not take these benefits into account when deciding on a traditional versus natural approach.

Secondly, we need to ensure that when any flood alleviation scheme is being considered – standard or natural – that the whole catchment's impact on the flood risk is taken into account. This could highlight the considerable amealiorating impact that land management measures may have downstream rather than dealing with the problem only through hard engineering closer to a town/city. The way in which the management of flood risk is considered in the first place is key to ensure natural approaches feature in thinking at the outset.

We would be interested in knowing whether the Welsh Government are working with other advocates of land management approaches to flood ameleoration in Wales and whether there is sense that NRW are fully embracing more naturalisitc measures when considering flood risk schemes? We need the flood risk teams in NRW to fully assess and incorporate such measures into their thinking regarding flood risk alleviation i.e. we need the portfolio of options to be expanded to include land management and tree planting measures, and we also need the rules governing public spending on flood risk to change to fully recognise the multiple benefits that natural flood risk measures can bring.

We are aware of two innovative projects lead by NRW in relation to natural flood risk management for the Clwyd catchment in North Wales which will support and enhance improved flood defences, particularly in relation to coping with future climate change and also contribute wider ecosystem services, in particular clean water and sustainable livestock production, both identified by stakeholders in the catchment as being the key priorities to stakeholders, in addition to flooding. We understand that the results/reports from these by will be available soon.

Lastly, the mapping reference at the end of the letter refers to revised woodland opportunity map. This will help identify areas where NRW can focus its efforts regarding supporting tree planting but ground truthing of the mapping and working closely with flood risk specialists and land owners will be required in order to fully understand where trees will deliver any flood risk benefit. Coed Cadw will be pleased to help facilitiate such work.

Coed Cadw would like to see a committment from the Minister promising that trees and the natural environment considerations will continue to be advocated and incorporated and even undertaken where it is appropriate. We suggest that a target is adopted to ensure that this process happens. The Welsh Government is the party that can direct NRW in the approach it takes and can approve and funding planting , and will be able to influence and advise others to do so, and therefore it would be better to see a stronger commitment to use its influence to ensure approaches that more sustianable and support multiple benefits.

We look forward to observing the next discussion on the matter.

Yr eiddoch yn gywir,

Angharad

Angharad Evans

Swyddog Ymgyrchoedd / Campaigns Officer