

From: [Rachel Lewis-Davies](#)
To: [NDF](#)
Subject: Welsh Government Consultation - National Development Framework
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[Consultation Response - National Development Framework - Nov 2019.doc](#)

Please find attached response from NFU Cymru.
I would be grateful if you could acknowledge receipt.

Regards
Rachel

Rachel Lewis-Davies

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NFU Cymru Response – Welsh Government Consultation – National Development Framework

NFU Cymru welcomes the opportunity to respond to the Welsh Government consultation on the National Development Framework which seeks views on the draft of the new national plan for Wales.

NFU Cymru champions Welsh farming and represents farmers throughout Wales and across all sectors. Our vision is for a productive, profitable and progressive Welsh agricultural industry that delivers jobs, growth and investment for Wales.

The importance of the farming industry in rural Wales cannot be over-stated. Welsh farming businesses are the backbone of the Welsh rural economy, the axis around which rural communities turn. The raw ingredients that we produce are the cornerstone of the £6.8 billion Welsh food and drink supply chain, 217,000 are employed across the whole food and drink supply chain with 78,000 employed in the Food and Farming Priority Sector.

We are proud that the Welsh public associate Welsh farmers, first and foremost, with providing safe, high quality and traceable food and at NFU Cymru we want to ensure that consumers in Wales, the UK and further afield can continue to enjoy and choose the top quality food that we produce here in Wales. Welsh farmers look after over 80% of the land area of Wales, maintaining and enhancing our natural environment – Wales' key asset. Farming activity supports a diverse range of species, habitats and ecosystems, provides a range of ecosystem services including flood alleviation, carbon sequestration, climate change mitigation; and delivers the significant backdrop for Wales' tourism and recreation sector worth an estimated £2.5bn annually. Welsh farmers are key promoters and protectors of our culture, heritage and the Welsh Language. Overall Welsh farming makes an unparalleled contribution to the social, economic, environmental and cultural well-being of Wales. The Welsh Agricultural Industry has the highest proportion of Welsh Speakers, more than any other sector.

Overall Welsh farming makes an unparalleled contribution to the economic, environmental, social and cultural well-being of Wales in line with the Well-Being of Future Generations Act summarised in our Welsh Farming: Bringing Wales Together [booklet](#) and [video](#).

NFU Cymru would place on record that this consultation has been undertaken against the backdrop of a period of unprecedented uncertainty for Welsh farmers and all those who are associated with Welsh farming. Concerns over the impact of leaving the EU and how this will impact on our future relationship with the EU and the rest of the World have dominated discussions and our ability to consult on the detail of the draft National Development Framework have been hampered as a result. The National Development Framework consultation has also coincided with Welsh Government's Sustainable Farming and our Land consultation which is the most significant for Welsh agriculture since the establishment of the National Assembly for Wales in 1999.

In this context, NFU Cymru has repeatedly requested to Welsh Ministers that all consultations be suspended until such time that they can be given the proper time and consideration that they deserve. We are disappointed that Welsh Government has failed to listen to these requests.

NFU Cymru, in our response to the Welsh Government consultation 'Positive Planning – proposals to reform the planning system in Wales' in February 2014, emphasised that it was vital that the National Development Framework was subject to appropriate scrutiny given its statutory weighting and its role in informing land use priorities and decisions on developments of National Significance. We do not believe this has been the case due to the timing of the consultation.

NFU Cymru supports a planning systems that delivers national, local and community objectives by supporting appropriate development. Central to this vision is a planning system that demonstrates a thorough understanding and appreciation of the role of agriculture, not only from the perspective of farmers as food producers and principle land managers but also having due regard to the critical economic relationship between the appearance of the countryside - so valued by society - and the need for profitable farm businesses to sustain it.

In a global context, with the challenges to our global food production system now well documented, it is important that the National Development Framework also recognises and enables the role of Welsh farmers in playing our part as producers of food to world leading standards in line with being a 'globally responsible' Wales. Farmers are also well placed to make a valuable contribution to many of the key challenges society faces including climate change through carbon sequestration and the harnessing of natural resources to generate electricity.

NFU Cymru would agree that our landscapes are amongst the best in the world. We would emphasise that there is a need, through the National Development Framework, to recognise that the Welsh landscape is not natural *per se*. It is the result of centuries of farming and other activities by man and its ongoing maintenance is reliant on ongoing management by farmers. We believe that it is vitally important that the Welsh landscape is viewed as a living, working environment which is constantly evolving. It is also important to recognise that agricultural land – created, shaped and maintained by farmers makes up by far the largest proportion (over 80%) of land area of Wales.

NFU Cymru has long called for an appropriate balance to be struck between the weight attached to the protection of the landscape and environment, and community and business development within Wales's rural areas with sufficient regard given to the social and economic well-being of those living and working within rural areas and maintaining Wales's iconic landscapes.

It is vital that these landscapes are allowed to adapt and change over time to remain functional and fit for purpose without unfair, costly and burdensome limitations and restrictions. There is also need to recognise that investment and modernisation in farming is essential to meet increasing consumer demands and also to keep the countryside and rural communities alive. This will become increasingly the case in the context of Brexit. Farmers in Wales are exploring options to future proof their farm businesses, upgrade their farm buildings and operations, become more efficient and meet new regulatory and market requirements. Indeed, in order for agricultural and local economies to remain viable and healthy they need the freedom to develop, to grow and expand and take advantage of technological advancements.

In the context of the National Development Framework and wider planning policy, it is important that Welsh Government ensures:

- The National Development Framework and development plans have policies to promote farming and food chain activities and support wider rural communities
- Farmers (tenants and landowners) should have more choice as to how they manage their land and buildings, to enable them to develop sustainable farm businesses

- The re-use of redundant farm buildings should be promoted where they can be re-used, for example, for employment or residential purposes to help support farming and the rural economy
- The National Development Framework and planning policy is future-proofed to ensure farmers can take the necessary opportunities to adapt to climate change and a low carbon economy as well as the predicted challenges to our global food production system
- The value of best and most versatile agricultural land is recognised in all decision making and non-farm related development is appropriately designated to avoid adversely impacting on farm businesses.

The planning system must also recognise that farming has a cross cutting role to ensure that a balance is achieved between economic, environmental, social and cultural well-being.

NFU Cymru would highlight that farming is an essential part of the Welsh economy, rural communities, Welsh language and culture as well as being of paramount importance on sustainable land use. NFU Cymru identifies that a strategic approach to planning is needed in the areas of:

- Smart technologies
- Good connections and improved digital communications
- Generating local scale energy
- The need to respond to specific characteristics of rural areas
- Protecting high quality land

Overall, the National Development Framework needs to enable and provide opportunities for economic development in rural areas. All Welsh farmers should have the opportunity to continue to run sustainable farm businesses and be the custodians of the treasured Welsh landscape.

Turning specifically to the draft National Development Framework 2020-2040, NFU Cymru notes the National Development Framework (NDF) is an overarching guidance document for local authorities and national parks setting out the spatial planning regime for Wales, informing public and private investment for the 20 years 2020-2040. The guidance relates to economic development, the environment and the well-being of communities to provide a basis for government policy and legislation.

Welsh language

NFU Cymru notes, within the draft Framework, there is an emphasis on the Welsh language with an ambition to increase the number of people who speak Welsh daily by 10%. NFU Cymru would emphasise that the rural community represents the core of Welsh speakers and this community is highly dependent upon an economically viable farming sector. Moving forward, the agricultural sector is going to need to diversify to maintain future viability and farms will need additional structures such as slurry stores and new buildings in order to meet changing regulatory requirements. Planning Policy and the National Development Framework should enable this.

Climate Change

NFU Cymru note, that the National Development Framework identifies climate change and a decline in biodiversity as the biggest challenges facing our nation. In the context of the Climate Emergency the National Development Framework will ensure the planning system nationally, regionally and locally focusses on delivering a decarbonised and resilient Wales.

NFU Cymru would highlight NFU Cymru's aspiration to achieve net zero agriculture by 2040. Farmers across Wales recognise the role we have to play in building a zero-carbon economy. Action to tackle climate change in our sector requires a portfolio of different policies and practices focussed on three key themes:

- Improving farming's productive efficiency to reduce our GHG emissions
- Farmland carbon storage in soils, wooded landscape and semi-natural habitat which should be conserved and enhanced
- Boosting renewable energy and the bio-economy to displace GHG emissions from fossil fuels and to create GHG removal through photosynthesis and carbon capture

In setting a path for farming to achieve net zero by 2040, it is important to recognise that achievement of net zero agriculture is not about exporting the impact of food production to other parts of the world. NFU Cymru considers that we will not halt climate change by limiting Welsh food production and off-shoring it to countries across the world which may not have the same environmental conscience or ambition to reduce their climate impact. The burden of decarbonisation should not fall unequally on Welsh farming or on our rural communities.

Water resources

NFU Cymru notes the draft National Development Framework refers to increased pressure on water resources as our climate changes with the need to consider where we will need water and how we safeguard our resources in the future. NFU Cymru would highlight that farmers are often wrongly portrayed as the key negative influence on water quality in Wales and cause of pollution. NFU Cymru is wholly opposed to the introduction of whole territory NVZ regulatory approach from the 1st January 2020 which will have significant implications for the planning system and has recently [submitted evidence](#) to Welsh Government to be considered in the development of new regulations.

NFU Cymru is concerned that the planning system will be used as a tool to prevent farmers expanding or investing in infrastructure that improves the environmental performance business on this basis. An enabling planning system is required to facilitate farmers to invest in farm infrastructure and to meet regulatory requirements.

Brexit

NFU Cymru notes that the National Development Framework recognises the vulnerability of the economy to Brexit identifying that both agricultural funding and regeneration programmes are areas of major public policy which have been shaped by wider European policies and funding. In response the NDF seeks to provide a positive, proactive framework to give certainty and direction on where Wales will grow and where Welsh Government will invest.

NFU Cymru would emphasise that almost three and a half years into the Brexit process we are little further forward in terms of understanding what the outcome will be. Will we leave the EU with a deal, No deal or will there be no Brexit? At this stage we have no idea what sort of future trading relationships will be. At this time of profound uncertainty we are asking Welsh Government, through its policies, to provide stability and certainty for Welsh farmers. The planning system and the National Development Framework will need to be sufficiently flexible to respond to outcomes, as yet unknown, and to enable farmers to respond and develop sustainable farming systems for the future.

National Development Framework Outcomes

NFU Cymru notes the eleven outcomes put forward within the draft Framework. Firstly we would place on record our surprise and concern at the lack of reference to food and access to safe, high quality affordable food and role of the National Development Framework in facilitating this. Access to high quality, safe, affordable food is the **most basic of requirements** to all people in society and it is critical to our well-being. Welsh farming underpins the Welsh food and drink sector as well as providing the backdrop for tourism – both identified as foundation sectors in Welsh Government's 'Prosperity for All'.

We emphasise at the very heart of sustainable development, underpinning Wales's legislative framework, lies the need to consider the needs of future generations as well as our own needs. Whilst access to high quality, safe, affordable food for the people for Wales may be taken for granted at present, the Future Generations Act should compel Welsh Government, through its policies, to consider the future challenges to our global food production system. These are increasingly well documented and include increasing global population, changes to size and nature of per capita demand, climate change as well as competition for key resources including land for food production, global energy demand and global water demand.

In terms of the desired outcomes proposed, NFU Cymru would emphasise that vibrancy in rural places is highly dependent upon a profitable agricultural industry for both direct and indirect employment and to provide opportunities for the younger generation. An appreciative planning policy is important in supporting and maintaining profitability. We emphasise that in addition to boosting resilience through diversification, planning policy must recognise its role in supporting farm businesses to become more efficient and also meet regulatory requirements.

With respect to outcome 9 relating to natural resources, we note reference to a reduction in levels of pollution and better resource choices. NFU Cymru would stress that we would support a reduction in levels of pollution, however, we are highly concerned that the farming sector could be the sole focus of pollution reduction activities as is the case currently. For example, through the introduction of regulatory measures to tackle agricultural pollution, Welsh Government is pursuing regulation of one sector instead of tackling all sources of pollution within a catchment. This is in spite of the evidence. We highlight that the farming sector offers significant potential to contribute to the 'creation of healthier, more sustainable places' but the planning system needs to enable this, for example, to facilitate investment in pollution control efforts. 'Better resource choices' is also highly subjective and value driven.

NFU Cymru notes outcome 11 relating to a sustainable, decarbonised society and we highlight that a large proportion of renewable energy projects need to be located in rural areas and can be undertaken as farm diversification projects. An over-zealous planning policy in some regions has resulted in many projects being inhibited. It is encouraging that Welsh Government is supportive of renewable energy proposals, but the planning system needs to be realistic with reference to landscape impacts and overriding need for renewable energy generation of a variety of forms. The planning system is not always appreciative of this need.

National Development Framework Spatial Strategy

With respect to the Spatial Strategy, NFU Cymru notes the draft policy seeks to prevent unjustified development in the countryside with development pressures channelled away from the countryside and productive agricultural land protected.

NFU Cymru would highlight that productive, profitable and progressive farm businesses in Wales are highly dependent on access to a skilled and reliable workforce whether externally recruited or through sons/daughters joining the family business. This workforce needs access to affordable dwellings close to, or for livestock husbandry reasons, at their place of work. We are concerned that rural housing is often unaffordable to rural enterprise workers. Current planning policy seeks to address this but the default position taken by many Local Planning Authorities with regards to rural enterprise worker's dwellings is a refusal. Whilst it is acknowledged that there is potential for abuse of the system, there needs to be a more coherent approach by planning authorities, whilst operating on a level playing field across Wales.

We note is a strong emphasis throughout the draft Framework on the future use of renewables and district heat networks (the generation of heat near towns, typically biomass, which provides heat to

properties through the use of a network of hot water pipes). Whilst the extent to which district heat networks are applicable in rural areas is questionable, we also question the extent they can be retrofitted to existing towns and cities due to the cost and disruption of laying the network of hot water pipes. In all reality district heat networks are only likely to be suitable for new-build estates on town and city peripheries.

Policy 3 – Public Investment, Public Buildings and Publically Owned Land

The draft National Development Framework recognises the rural character of large parts of Wales and includes specific reference to supporting rural areas. We are pleased that Welsh Government recognises the challenges faced by the rural economy and, in particular the agriculture sector, with the planning system needing to respond to these challenges, facilitating appropriate new development and diversification. NFU Cymru would emphasise that this policy position needs to be adopted at all levels of planning policy and practice.

Policy 4 – Supporting Rural Communities

We note and support that the draft Framework identifies that Local Development Plans should support strong and resilient rural areas, with a positive framework for economic development, diversification and meeting local housing needs. Strategic spatial decisions must ensure the needs of the dispersed rural population are met.

Policy 5 – Delivering Affordable Homes

NFU Cymru would highlight there is a significant shortfall in affordable housing provision and it is estimated that 47% of all new homes should be affordable homes in order to meet the shortfall. Given that rural enterprise dwellings are considered as affordable housing, we would stress the need for planning policy to be relaxed to enable more housing for rural workers.

Policy 6 - Planning in Mobile Action Zones

NFU Cymru notes and welcomes there is a commitment, within the draft Framework, to provide good mobile phone coverage across the whole of Wales with a presumption in favour of new mobile phone infrastructure, provided that there are “no significant adverse landscape impacts.”

With respect to digital communications, NFU Cymru notes that within the draft Framework there is a focus on the changing economy with a greater anticipated reliance on the digital economy, with 93% of homes having access to superfast broadband. NFU Cymru would highlight that many farm businesses are located in rural areas that do not have any broadband or mobile phone signal. A significant proportion of farming business undertakings, including grant applications and interactions with Welsh Government, are now conducted on-line. Farm businesses with no digital connection are at a disadvantage both in terms of day-to-day business operations as well as farm business development and diversification. Farms without digital connection can also experience greater levels of social isolation.

Furthermore, agriculture is often a solitary occupation in isolated areas. The lack of mobile phone signal leaves farmers vulnerable in the event of accidents or injuries. There is substantial evidence from NFU Cymru members that digital providers have abandoned rural areas, with no plans for future investment. More must be done to ensure that the funding and regulatory framework is put in place to support the accelerated rollout of broadband and mobile coverage to all rural areas of Wales.

Policy 8 – Strategic framework for biodiversity enhancement and ecosystem resilience

NFU Cymru notes that in order to meet commitments to biodiversity and ecosystem improvements, Welsh Government will identify key areas of ecological importance and associated networks to combat climate change – these will be safeguarded to prevent inappropriate development.

NFU Cymru is concerned there is a danger that this will prevent farmers from expanding their businesses or meeting regulatory requirements such as construction of slurry stores, effluent tanks or diversifying to enable the farm business to continue to operate.

We further note, there is a commitment to expand and connect designated ecosystems and safeguard land which may be needed to connect ecosystems. This does not necessarily prohibit any development but the site's potential needs to be taken into account when considering development. Interconnectivity of species-rich meadows is specified. The draft Framework species that local authorities and Natural Resources Wales should work together to ensure that appropriate action is taken to safeguard sites both within and beyond their administrative boundaries. Safeguarded areas should be identified through the Green Infrastructure Assessment, and set out in the development plan. NFU Cymru would highlight that assessments undertaken by local authorities are often undertaken by over-zealous ecologists who wish to prevent any development with the result that the economic viability of longstanding farm business can be put in jeopardy. Whilst a long term viable ecosystem is an important factor, in the absence of a financially viable agricultural industry, many of the benefits bestowed by farmers could not be provided. Planning policy must recognise this.

NFU Cymru is concerned at the reference to Area Statements as a material consideration within development plans. NFU Cymru is absolutely clear that random lines on maps and the 'un-costed wish lists' of environmental activists on land they do not own at the Area Statement workshops can form no evidential basis for future planning policy.

NFU Cymru would also place on record our position with respect to rewilding. Whilst rewilding, as a concept, has received increased focus in recent years, it has many and varied definitions, and means different things to different people. Rewilding and non-interventionist approaches to land management are at odds with how we use our land in Wales currently, where over 80% is farmed for the production of food alongside the delivery of environmental goods. The National Development Framework should not be a mechanism to facilitate widespread land use change from agriculture. Species reintroduction also has the potential to be damaging to farm businesses and should be subject to full consultation taking to account the concerns of local farm businesses.

Policy 9 - National Forest

NFU Cymru notes that Policy 9 refers to Welsh Government's commitment to developing a national forest with appropriate delivery sites and mechanisms to be identified to achieve this aim. Action to safeguard proposed locations for the national forest will be supported.

Firstly, NFU Cymru would highlight that Welsh Government already has a National Forest in the Welsh Government Woodland Estate (WGWE) which extends to over 126,000 hectares currently. In the first instance this should be managed to optimise the delivery of benefits Welsh Government is seeking including leisure and tourism.

NFU Cymru would also highlight our concerns with Welsh Government proposals for afforestation to deliver climate change aspiration targets as set out in its Low Carbon Pathway consultation in 2018. This includes proposals to double the emissions sink arising from forestry by 2050 delivered largely through afforestation (90%) with some contribution from agro-forestry (10%). This equates to approximately 66,000 hectares of new planting. To achieve afforestation on this scale proposed would require the complete afforestation of some 1,400 farms in Wales. We are concerned that widespread land-use change is a significant threat as a result of proposals.

NFU Cymru is highly concerned that no assessment of impact has been undertaken to understand impacts on the farming families affected, rural communities, the rural economy or indeed, food as one of Wales's foundation sectors, the Welsh language or environment.

We identify that change on this scale is likely to be highly emotive within rural Wales. We are clear that the burden of decarbonisation must not unequally on the farming sector or our rural communities.

NFU Cymru would emphasise we are clear of the role Welsh farming has to play in contributing to the decarbonisation of the economy. We would highlight that NFU Cymru's net zero agriculture aspiration places emphasis on policies and practices that improve farming's productive efficiency; enhancing farmland carbon storage; and boosting renewable energy and the bio-economy.

In this context NFU Cymru is supportive of measures that facilitate and adequately reward farmers for additional woodland planting and ongoing management of woodland on farms in Wales. Many farmers in Wales are prepared to consider farm woodland at an appropriate scale including small scale shelter belts, field corners and parcels with a mixture of deciduous and evergreen species of both trees and shrubs together with hedgerows and streamside corridors that contribute to improved connectivity at the landscape scale.

We note that Welsh Government have established a target to increase woodland by at least 2000 hectares per annum. NFU Cymru does not support the National Development Framework establishing preferred locations or sites for afforestation that could result in compulsory afforestation of privately owned land or development proposals for farm expansion and diversification projects not being supported through the planning system.

More information is required on how Welsh Government envisage the planning system assisting the creation of the National Forest. We also express concerns that there may be a trade-off between providing permission and the compulsory planning of trees through Section 106 agreements.

Policies 10-14 – Renewable Energy

We note that Welsh Government are committed to renewable energy sources and want 70% of all electricity to be from renewables by 2030 with all new renewable projects to be part locally owned by 2020. We would emphasise that the definition of local ownership must include farmers. We would highlight that given that farmers manage 80% of the land area of Wales they are well positioned to make a key contribution to the Welsh Government target while maintaining our traditional role in food production as well as the delivery of wider economic, environmental, social and cultural benefits for society.

The planning system is regularly cited by our members as a barrier to taking forward renewable energy projects on farm. Grid connection and lack of local network capacity with difficulties connecting to the national grid is also identified as a key issue. Whilst this has to be a key focus area for Welsh Government if meaningful progress towards renewable targets is to be made, this has to be balanced with the need to ensure that major infrastructure projects to deliver grid connection do not damage agricultural land or negatively affect farming businesses. NFU Cymru is clear that there should not be an automatic presumption that agricultural land can be sacrificed for infrastructure projects of this type.

With respect to Policy 13 – Other Renewable Energy Developments, we note the draft National Development Framework refers to other renewable energy projects being supported in principle with Welsh Government preparing a map to identify potential opportunities.

We also note the draft Framework states *“Renewable energy projects can also provide environmental benefits, such as contributing to resilient ecological networks, restoring degraded peatlands and restoring semi-natural grasslands on post-agricultural land. The Welsh Government encourages active consideration of how these benefits can be realised in all renewable energy developments. With all projects, provisions for access to the site for construction and maintenance of the scheme should recognise and respond to the environment in which they are located. The careful removal of infrastructure as soon as their use ceases and the appropriate after-use of the site will also ensure environmental benefits are realised.”*

NFU Cymru is concerned this could mean that there is a preference given for renewable projects which ‘restore’ various environmental features or provide them as mitigation for visual harm. This could imply that, in some areas, permission will only be granted for renewable energy projects if farmers reverse the land improvements they have undertaken in the past, such as drainage and soil and grassland improvements. We highlight this could jeopardise the long-term agricultural viability of farms and their ability to maintain stocking levels. NFU Cymru would emphasise the planning system must enable a range of diversification activities to take place on Welsh farms alongside their core food production role.

Regional Planning

With respect to Policy 16 – Strategic Policies for Regional Planning, NFU Cymru notes that Wales has been divided into three regions – North; Mid & South and South East Wales.

North Wales

NFU Cymru notes that the focus for growth is in Wrexham and Deeside plus the coastal towns, with a new Green Belt proposed for the north east of Wrexham/south east of Deeside to prevent coalescence. NFU Cymru has concerns that this may place limitations on farm diversification activities.

The draft Framework also identifies that flooding is a localised issue in these areas which needs to be addressed. NFU Cymru would emphasise Welsh Government must adopt a strategic approach to flood risk management which recognises the importance of food and farming to the wider economy.

It is important that if farmland is allowed to flood to protect urban communities downstream, that this is voluntary and is done by design rather than default and that the full value of this land in terms of food production, environmental benefits and infrastructure protection as well as the full costs of remediation are acknowledged.

Where ‘hard’ engineered defences are de-emphasised and ‘space’ is required for floodwater through natural flood management approaches, it is important to recognise that it will be agricultural land in the main that will be flooded. We are clear that agricultural land should no longer be considered ‘sacrificial’. Nor should there be an expectation that farmers should give up their land for temporary floodwater storage as an act of charity. Farming is a business that is equal to any other; an appropriate balance must be struck between flood management, the environment and food production.

Mid & West Wales

NFU Cymru notes that the National Development Framework refers to the region as having significant tourism potential and that it is important that the region’s distinctive heritage is preserved and enhanced by high quality development. NFU Cymru is concerned that may have the effect of preventing agricultural development in the region because it does not conform to perceptions of the rural idyll. We would highlight that it is the day-to-day farming operations which have shaped,

created and maintained the distinctive appearance of the Welsh countryside providing 'sense of place' and an important dimension to the visitor experience. Welsh farm businesses have to be allowed to develop and be profitable in order to maintain that distinctive appearance.

South East Wales

NFU Cymru notes Policy 30 relates to Green Belts in South East Wales which This will cover an area around Newport and the eastern part of the region – roughly north of the M4 from Caerphilly to Chepstow and north to Monmouth, creating a Green Belt area over 1/3 of Monmouthshire.

Green belt will place specific planning constraints on the land within that area and we would express concern that this is likely to be a significant hindrance to farmers in the area because average farm size is relatively small with many farmers actively pursuing diversification opportunities to survive. Whilst green belt policy will allow necessary work and development for agriculture, it will cause significant resistance to non-agricultural development proposals.

Annex 1 - The Contribution of Agriculture to the Well-Being of Wales

The Welsh Government Well-Being of Future Generations (Wales) Act 2015 is designed to improve the social, economic, environmental and cultural well-being of Wales. The Act establishes seven goals that all public bodies, including Welsh Ministers, must work to achieve. The contribution that farming makes to achievement of all seven goals is unparalleled by any other industry, as highlighted in the following below:

Well Being of Future Generations Act:	NFU Cymru: Agriculture is the Answer
Well-being Goals	
A prosperous Wales	<ul style="list-style-type: none"> • 60,000 employed full or part time in farming in Wales • £1.5bn Gross Output • Farming underpins a food supply chain worth over £6bn • Over 220, 000 people in Wales are employed in the agri-food sectors – that's 17% of the workforce and Wales's biggest employer • The Welsh countryside managed by farmers provides the backdrop for the tourism industry worth over £2.5bn • The Welsh agricultural industry is a key generator of wealth and employment for the people of Wales
A resilient Wales	<ul style="list-style-type: none"> • Farmers care for 81% of total land area of Wales – that's over 1.84m hectares • 600,000 ha of environmentally designated areas • Almost 560,000 ha managed under Glastir Entry Sustainable Land Management Scheme designed to combat climate change, improve water management and maintain and enhance biodiversity • Farming supports a diverse range of species, habitats and ecosystems • Farmers provide a range of ecosystem services including carbon sequestration and management, water quality and water quantity management for flood alleviation • Low carbon, local energy installations have the potential to meet 57% of Wales's electricity consumption and the evidence shows a large proportion of projects are located within Wales's rural local authorities • GHG emissions from agriculture have declined by 20% since 1990 and further decreases are being achieved through production efficiency measures • Welsh farmers play a key role maintaining and enhancing our natural environment and supporting the provision of a full range of ecosystem services
A healthier Wales	<ul style="list-style-type: none"> • Welsh agriculture is a key provider of safe, nutritious, high quality Welsh food which plays a fundamental contribution in supporting the physical and mental well-being of the people of Wales • Welsh farmers are known to operate to some of the highest standards of welfare and production in the whole world • Welsh farming also delivers a significant proportion of Wales's access provision which includes 16000 miles of footpaths, 3000 miles bridleways, 1200 miles of cycle network, and 460,000 ha of open access land • Welsh farming makes a key contribution to the physical and mental well-being of the people of Wales
A more equal Wales	<ul style="list-style-type: none"> • Rural Wales is home to 33% of the Welsh population. • The vitality and potential of rural areas is closely linked to the

	<p>presence of a competitive and dynamic farming sector. The NFU Cymru 'Why farming Matters to the Welsh Economy' shows that each family farm is typically economically linked to some 40-80 other businesses in the region</p> <ul style="list-style-type: none"> • Through direct and indirect employment in rural communities, Welsh farming underpins the rural economy and contributes to a more equal Wales
A Wales of cohesive communities	<ul style="list-style-type: none"> • Local communities in rural Wales are heavily dependent on agriculture for financial and social prosperity. • Leadership and voluntary roles in rural communities • Welsh farmers make a key contribution towards the provision of attractive, viable, safe communities in rural areas
A Wales of vibrant culture and thriving Welsh language	<ul style="list-style-type: none"> • Agriculture has the highest proportion of Welsh speakers of any sector. • Farming is the bedrock of rural communities across Wales which have been shaped by farming activity spanning hundreds of years. Farmers continue to maintain these traditions, preserving rural culture and sense of place • Welsh farmers are key promoters and protectors of our culture, heritage and the Welsh language
A globally responsible Wales	<ul style="list-style-type: none"> • Current levels of self-sufficiency at a UK level are at 62% • Future challenges to our global food production system include climate change, a growing UK and global population, water scarcity. Given its climate and rainfall, Wales is predicted to be an area of favoured production in the future • Welsh farmers have a key role to play feeding the people of Wales and in contributing to global food security now and in the future.